

7 December 2022

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File No: 2022/611104
Your Ref: SSD-35962232

Pamela Morales
Department of Planning and Environment
via Major Projects Planning Portal

Dear Pamela,

Advice on Environmental Impact Statement – Burrows Road Multi-Level Warehouse – 1-3 Burrows Road, St Peters

Thank you for your correspondence dated 16 November 2022 inviting the City of Sydney (the City) to comment on the Environmental Impact Statement (EIS) submitted for the Burrows Road Multi-level Warehouse proposed at 1-3 Burrows Road, St Peters.

The SSD proposes demolition of all existing structures, tree removal, site remediation and the construction and operation of a new three-storey warehouse and distribution centre building and car parking.

The City has reviewed the EIS and supporting documents and provides the following comments for your consideration.

1. Urban design

Overall, the proposed building is well resolved in terms of urban design and appears to have considered the recommendations of the design competition jury. The proposed warehouse follows the curved alignment of Burrows Road, which is important in minimising the visual impact of the development and relating it to the development across Burrows Road.

The following points are raised for your consideration:

- The pedestrian access from Burrows Road could be improved if it were a more direct path of constant width.
- The Landscape Plan for the Burrows Road edge indicates an organic response to the site. From an urban design perspective, the planting could be organised to strongly reinforce the Burrows Road alignment spatially. As proposed, the streetscape detail plan is read as being suburban and the section raised towards the building is problematic spatially.
- The space between the kerb and the building should be flat so that the curve along Burrows Road is the dominant spatial alignment. All tree planting in terms of species and spacing should reinforce this alignment.

2. Landscape

Overall, the proposal strives for a greened outcome on this large industrial site, which is a principal that is supported by the City. To ensure this vision is realised, the submitted plans require clarification to ensure the proposed design is viable, meets the planning controls, adequately responds to the site constraints and resolves the recommendations of the design competition jury.

The following comments regarding the landscape design and documentation are raised for your consideration.

2.1 General comments

The Landscape Plans submitted with the application are coloured and conceptual and have been drawn at various scales. The plans are too high level to allow proper assessment of the suitability of the design, location of future seating, site signage and other elements in landscape areas. For example, site and tree planting plans are drawn at 1:500 at A1 scale or 1:1000 at A3, and the tree canopy calculation plan is 1:750 scale at A1.

It is recommended that all landscape plans and sections be drawn to a scale that is consistent, include levels and be made legible at A3 in black and white.

2.2 Site area and survey

The survey indicates that the total site area is approximately 32,720sqm whereas the EIS states that the area is approximately 34,614sqm. Clarification of the actual site area is required.

2.3 Design competition jury report

The Selection Panel identified several landscape elements as being important to the success of the Welsh Major scheme that had potential for design excellence.

The panel advised that further resolution of the Connecting with Country narrative is needed to achieve a sense of connection between elements. This included clarification and resolution of the following landscape related issues:

- i. Greater consideration of indigenous planting / landscaping (socio-ecological planting considerations). Planting to also respond to a changing micro-climate resulting in not just one rigid outcome.*
- ii. Consideration of a café or break out spaces for all workers on site. Additional detail relating to the roof garden is to be provided with the SSDA to provide clarity on set-downs, deep soil provisions and sectional details.*
- iii. A whole of building Maintenance Strategy is requested to confirm how the facade and landscape elements will be appropriately maintained to ensure longevity*

Yerrabingin have been consulted as part of the design team to guide the Designing with Country response. Design concepts of water movement, scale, seasonality and care for country have been incorporated. These present as themes of recreated swamps, plant species selection pollinator ladders and a bush tucker garden on the office rooftop.

Communal open space for office workers is provided as a rooftop garden that includes a shade pavilion, bush tucker garden and edged by a mounded landscape. The design requires amendment/clarification to provide adequate soil depth and volume to support trees and detail of the angled mesh balustrade that prevents workers falling over the roof edge. Refer to point 2.10 below.

A whole of building maintenance strategy does not appear to have been provided. This is problematic for landscape proposed on upper levels of the office building and roofs of the vehicular ramps. This should be provided.

2.4 Contamination

All landscape areas located outside of the building footprint and roadways are to be remediated to ensure the land is made safe. There is insufficient information to confirm the proposed remediation strategy for landscape areas and that these areas will not be concrete capped. There should be placement of a geotextile marker layer and allowance for minimum 1 metre depth of virgin excavated natural material (VENM) to support the healthy growth of trees to maturity.

The Remedial Action Plan (RAP) should be updated to include sections to describe remediation of deep soil zones with VENM to compliant soil depth and volume for new medium to large trees.

2.5 Deep soil

The warehouse footprint and circulation spaces occupy the majority of the total site area. A minimum 15% of the total site area is required to be provided as deep soil.

Where site conditions allow, the consolidation of deep soil areas are to be in the front building setback and external breakout spaces. The minimum dimension for deep soil planting is 3 metres in any direction

Appendix H states that the proposal allows for 5,293sqm deep soil of which 666sqm is permeable paving areas, which equates to 15.3% of the site area.

Upon review of the civil plans, the deep soil zone appears to be impeded by bioretention swales, stormwater drainage, seating, driveways and signage.

The City notes that without a reduction of the building footprint to increase unimpeded deep soil without engineered drainage solutions, the proposal is unlikely to meet 15% compliance.

2.6 Landscape setback and drainage devices

Sydney DCP 5.8.2.2 requires setbacks to form a visual extension of the public domain and include landscaping to enhance the appearance and bulk of industrial buildings.

A 6 metre landscape setback is required to both frontages that is landscaped to complement the streetscape and is clear of built obstructions including storage areas, signage, parking and building overhangs, including sun control devices.

The proposed landscape setback includes areas of permeable pavement with seating areas, egress paths, driveways, signage, fire booster and stormwater drainage devices.

A review of the civil plans indicate the 6 metre landscape setback is significantly impeded by stormwater pits and 450mm diameter pipes, as well as three long curved 1

metre wide bioretention swales lined with rock rip rap. The bioretention swales are 120 to 135m long on Burrows Road and up to 250m long on Canal Road (Fig 1 below).

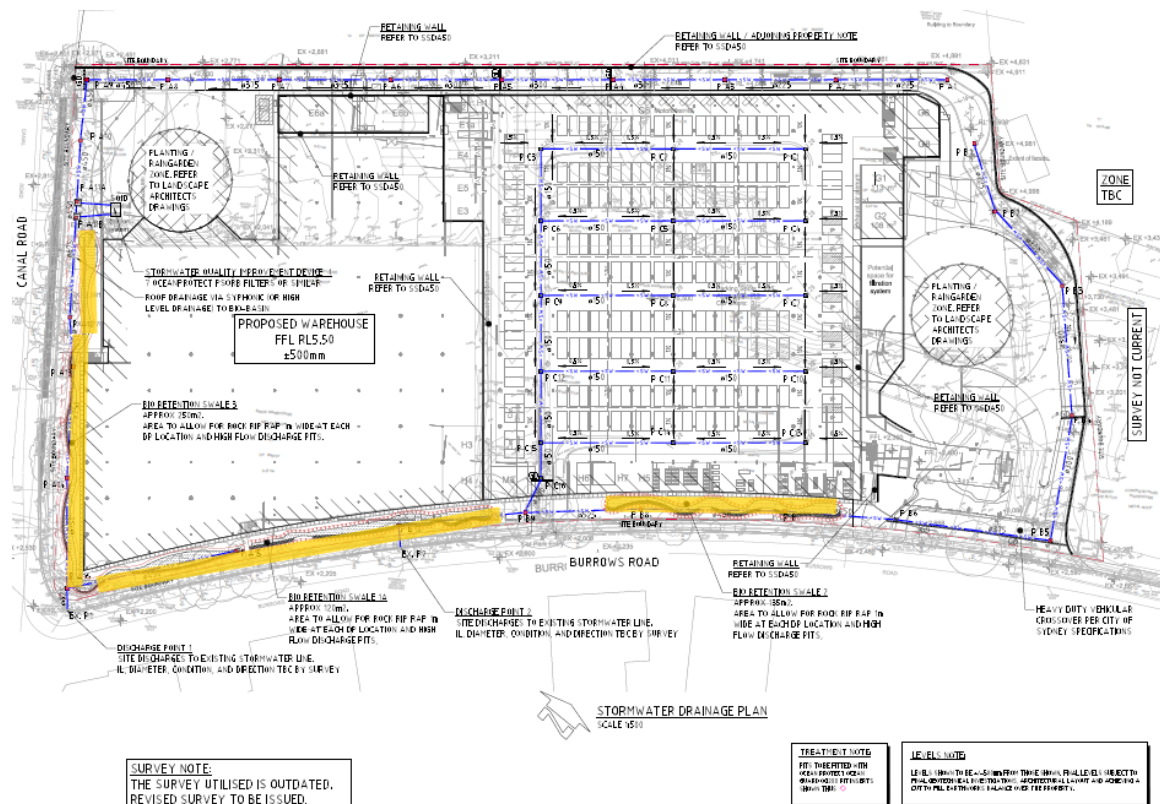


Figure 1: Appendix X Stormwater drainage plan (bioretention devices in yellow)

The following issues are to be clarified:

- It is unclear whether the 500mm depth bioretention soil filter media detailed by the engineer needs to be removed and replaced in the future to maintain effectiveness as a drainage device.
- Whether the civil design considers remediation of site contamination in the landscape setback.
- It is unclear if the stormwater design has been coordinated with the landscape design and tree placement and if there is adequate soil volume to support the trees to maturity.

The applicant is requested to submit an engineer's report to clarify the design and requirements including remediation. The City also requests landscape plans at a legible scale, black and white that clearly demonstrate coordination and resolution of the landscape setback, location of trees, levels (IL, RL, TW) and confirm the permeable pavement specification and detail.

2.7 Substations

EIS section 6.1.14.2 states that three 1500kVA chamber substations will be required, although there is ambiguity within the EIS and section 1.3 states two chamber substations are proposed as part of the site landscaping.

Two chamber substations are located deep in the site to the northwest and there is a 7 metre road access to Canal Road over deep soil with permeable paving. The frequency of use of this entry point is questioned.

Clarification is required regarding the number and access requirements to chamber substations to assess any impacts on proposed tree planting within the 6 metre wide setback.

2.8 *Raingardens and 'recreated swamps'*

Raingardens are proposed at the centre of the ramps at ground level in 'recreated swamps' to provide filtrations before water enters the stormwater system. However, the civil plans do not include design of the raingardens and swamp areas at the centre of each circular truck ramp.

The typical landscape raingarden detail does not include dimensions and appears to be a domestic scale swale. Clarification is required regarding the drainage design, purpose, how rainwater is treated in the raingardens and if the raingardens are connected to the site wide stormwater drainage design or isolated features.

Additional civil and landscape design and details clarifying the above are requested.

2.9 *Planters on slab – office building*

Five 'pollinator ladders' planters are located on the northern edge of the office building on levels 0.5, 1, 1.5, 2, and 2. These planters are shown in elevation but not in the landscape plans.

The architectural plans do not clearly depict if there is an operable window for safe access for planter maintenance and rope access from the roof garden will be difficult as this footprint is smaller than the office floorplate.

Amended landscape plans are required for the pollinator ladders, with a detail and a maintenance access strategy.

2.10 *Green roofs – office building and vehicular ramps*

The proposal provides 1,423sqm of green roof area at the office roof terrace and on top of the ramp roofs.

Office Level 3 communal roof garden

- The rooftop includes a shade pavilion, bush tucker garden, graded 1:20 path and seating areas. Four or six shade trees are proposed in mounded gardens, however there are insufficient levels to assess the garden design. The sections indicate that the garden slopes up to the outer edge to achieve soil depth. The section and details are to confirm the planter design allows for.
- The garden slopes up to the north to provide soil depth for a bush tucker garden and edged by rooftop tree planting. A sloped mesh balustrade is proposed to the outside edge. Details clarifying the design and how this will prevent people stepping over the edge of the building and falling are required.

- Insufficient levels and details have been provided to confirm the design achieves minimum soil depths and soil volume required by the Sydney Landscape Code to support the healthy growth of trees and proposed understory plant species, and in addition to drainage and irrigation.
- It is unclear whether rainwater harvesting is proposed for irrigation reuse on the office rooftop garden and landscape at grade.

Vehicular ramps

Inaccessible green roofs are proposed to the two 50 metre diameter ramps with a 'partial garden cap' located at the north and south of the warehouse. Cascading plant species are proposed to the edge and shown in landscape sections. However, there is insufficient green roof detail to confirm the design and how will this be access and safely maintained post construction contract on an ongoing basis.

The following information is required:

- Amended office rooftop garden plan with levels (SSL, RL, TW) and sections to demonstrate the design of the planter types, tree planters with min 800mm soil depth and no reliance on excessive mounding and comply with the Landscape Code.
- Roof garden balustrade details.
- Inaccessible green roof plan with section and details and an outline access and maintenance strategy. Noting green roofs are supported when feasible as the feature is to be maintained for the life of the building.
- Clarify if rainwater harvesting off the warehouse roof is proposed.

2.11 Other issues

The Architect's reports notes that the office lobby includes a landscape with water narrative that is central to the Designing with Country scheme. There does not appear to be any detail to confirm the design. Clarification is required as to how water is incorporated and who is detailing this feature.

3. Tree management

3.1 Tree retention

The proposed retention of 34 trees is supported. These are all located on Council land and will require tree protection measures to be implemented during the works.

It is recommended that a site specified Tree Protection Plan prepared by a Consulting Arborist (minimum AQF Level 5) be developed prior to the commencement of any construction works. The TPP must be prepared in accordance with the Australian Standard AS4970 'Protection of trees on development sites'.

3.2 Tree removal – supported

The proposed removal of all trees within the subject site is supported. The majority of these trees are rated as having low retention value and provide minimal amenity and

canopy cover to the immediate area. A number of high and medium retention value trees will also require removal which is noted. Retaining these trees would not be possible due to future building demolition works, basement excavation and site remediation works that will directly impact on the trees.

3.3 Tree removal – not supported

The removal of trees numbered 24 and 25 in the Arboricultural Impact Assessment dated 2 November 2022 is not supported. These trees are located on the neighbouring property and will require owner's consent, should removal be required.

The proposed removal of street trees numbered 27 and 64 in the applicants Arborist Report to facilitate the new driveway is not supported. These trees are important community assets that must be retained and protected. The removal of street trees for the purpose of new driveways is not consistent with Section 3.11.11 of the SDCP 2012. Provision 4 outlines that 'Parking and driveway crossovers are to be designed to minimise impact on existing street trees and to maximise opportunities for new street tree plantings.'

It is recommended that the design be amended to ensure all street trees are retained and future planting opportunities are not lost due to new driveway locations.

3.4 Landscape and Sydney DCP 2012

The following comments are made in relation to the proposed tree planting and canopy cover:

- The proposal does not meet the required 15% canopy cover. Whilst only shy of this requirement at 14.7% according to the landscape plan, the majority of the trees are positioned too close to each other and will not fully establish into the expected tree heights and canopy spreads due to competition. Also, the proposed tree planting along the burrows Road setback area is positioned under existing street tree canopies. Therefore, this proposed canopy cover percentage is considered to be an inaccurate reflection of this site.
- The proposed tree species should include a greater diversity of trees species across the site. The use of *Melaleuca quinquenervia* (37 new trees proposed) is considered excessive. This species should ideally not be used at all due to its susceptibility to myrtle rust and also being prone to failure.
- There is opportunity to plant a higher number of trees across the site that would achieve in excess of 15% canopy cover and greatly improve an area that is lacking greenery.
- Therefore, in order to achieve the objectives of the DCP and various Council policies in terms of increasing canopy cover, improving the local environment, and reducing the effects of the urban heat island effect, the City strongly recommends that the design be amended to increase canopy cover and species diversity.

4. Access and transport

4.1 Access arrangements

The proposed driveway configuration is generally acceptable. However, clarification is requested as to how the ingress point off Canal Road will be managed such that it is only used by fire brigade vehicles as intended.

4.2 Parking

The proposed 224 car parking spaces is within the maximum permitted under the SDCP 2012. The proponent should clarify how many bays are reserved for courier use only and how this will be managed so that this does not eventually become used for staff parking.

4.3 Bicycle parking and end of trip facilities

The proposed 58 employee spaces and 15 visitor spaces are supported.

The location and design of both types of bike parking should be in line with the requirements of the SDCP 2012. Staff bicycle parking should be Class 2, as noted in the Transport Study. Visitor bicycle parking should be Class 3 and located in a publicly accessible area close to the building entrance, as per the SDCP 2012.

4.4 Traffic assessment

The proposal has used survey data of similar sites to inform traffic generation rates rather than using the standard RMS guide assumptions, which is supported by the City.

The design vehicle used is a 20m articulated vehicle. It is noted that this exceeds the 19m limit on general access vehicles, so this would not be permitted for use on Bourke Road or Campbell Road.

However, Figure 20 and 21 shows this route being used for heavy vehicle movements. The proponent should clarify the maximum size of vehicles to be used on each of the access and egress routes.

4.5 Construction traffic management

It is noted that a Construction Traffic Management Plan should be submitted and approved prior to commencement of work on the site.

4.6 Travel behaviour

The Green Travel Plan is generally supported. However, the symbols for 'off-road shared path' and 'planned off-road shared path' on the TAG are very similar and difficult to distinguish. This should be updated.

4.7 Swept paths

It is unclear from the swept path diagrams whether there will be any impact to on-street car parking. This should be clarified, noting that any changes would need to be approved by the City's Traffic Committee.

5. Public Domain

5.1 Public domain upgrades

The proposal does not include specific public domain plans however the landscape and architectural plans show the existing road conditions, with five new driveway crossovers proposed.

Given the scale of the development, extent of crossovers proposed and the intensification of the use, it is considered reasonable to require the development to upgrade the surrounding public domain frontages to meet the City's standards.

The existing kerb and gutter should be retained or replaced after a detailed review on site to determine which sections are serviceable or need to be retained due to existing street trees and which sections are damaged and need replacing.

Public Domain lighting will also need to be assessed and upgraded as necessary to meet the City's lighting specification.

The above can be achieved through the preparation of a Public Domain Plan and other public domain information. The City can provide relevant public domain conditions to DPE when required.

5.2 Driveways

The five proposed driveway crossovers are not supported by the City as their layout shown on the plans does not comply with the City's Technical Specification and Standards.

These driveways need to be a maximum width of 6 metres with a minimum 2 metres between the driveway crossovers and minimum 0.5 metres between the driveway wings to provide sufficient space for pedestrian safety circulation as required by the City's Sydney Streets Technical Specification.

5.3 Street trees

As outlined under the tree management comments above, the removal of several existing street trees for new driveways is not supported. Further investigation could possibly allow driveways to be repositioned for the trees to be retained.

Notwithstanding the above, the architectural and landscape drawings must be consistent with their public domain proposals and show exactly which existing street trees are proposed for removal and retention.

5.4 Stormwater and flooding

The site is located within a flood affected area. The Civil Report states that the subject site is not included in the latest Flood Study undertaken in 2020. Council is in the process of reviewing this matter to determine the figures required as a basis for the flood levels. The City's additional comments on stormwater and flooding will be provided separately in due course.

6. Environmental Health

6.1 Contamination

The draft Section B Site Audit Report submitted with the application has identified data gaps in respect to landfill gas that will need to be closed prior to consent being issued. A further final Section B Site Audit Statement must be issued by the same Auditor

certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.

6.2 Acoustic impacts

The Noise and Vibration Impact Report prepared by SLR has been reviewed and the following comments are provided.

- The nearest affected residential and commercial receivers must be denoted and annotated on a suitable plan/ map to demonstrate the exact location and type of receiver.
- Any future approved land use or development applications permitting residential uses must also be considered in the nearest affected receiver assessment.
- Exceedances to sleep disturbance criteria of operational noise have been predicted when truck movements are occurring at night time. Therefore, truck movements at night time should be restricted by way of a condition of consent between sleeping hours of 10pm to 6am or the hours of operation curtailed to prevent operation of the site between 10pm to 6am.

7. Public Art

The proposal includes a major integrated public art and lighting strategy in the form of LED facade lighting. The public art strategy does not address sustainability or the climate impacts of the proposed artwork.

Given the scale of the proposed development and artwork and the City's commitment to taking action on the climate emergency, it is recommended that the strategy be amended to address these issues and include details in the proposed artist briefs.

Should you wish to speak to a Council officer about this advice, please contact Samantha Kruize, Senior Planner on 9265 9333 or at skruize@cityofsydney.nsw.gov.au.

Yours sincerely,



Bill MacKay
Manager Planning Assessments