

7 December 2022

Our Ref: SF22/3686
Our Contact: Matthew Hammond (02) 9562 1621

Pamela Morales
Planning Officer, Industry Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Pamela,

RE: Request for Advice – Environmental Impact Statement – Multi-Level Warehouse, 1-3 Burrows Road, St Peters [SSD-35962232]

Thank you for the opportunity to provide comment on the Environmental Impact Statement (EIS) for the proposed multi-storey warehouse at 1-3 Burrows Road, St Peters. Although the proposal is situated in the City of Sydney Local Government Area (LGA), there are a range of potential cross-border implications for Bayside Council, owing to the subject's site location near the border with the Bayside LGA.

The Proposal

Bayside Council (Council) was notified of the EIS for State Significant Development (SSD-35962232) via the *Major Projects Planning Portal* on 16 November 2022. Council was notified due to the submission of previous comment on the Planning Secretary's Environmental Assessment Requirements (SEARs) given on 5 September 2022.

It is understood that the proposal is for the development of a multi-storey warehouse at 1-3 Burrows Road, St Peters (the site), with a development site area of 34,614sqm, comprising:

- Demolition of all existing structures and buildings on site;
- Tree removal both on site and for a limited number of trees in the public domain and adjoining lot;
- Site remediation, and establishment works, including minor excavation / bulk earthworks;
- 224 car parking spaces (including 12 accessible bays), 17 service vehicle spaces for vans/utes, 19 motorcycle spaces, and bicycle parking (including 15 visitor spaces) and end-of-trip facilities (including 58 bicycle parking spaces, showers, lockers, and change rooms for occupants);
- New crossings to Burrows Road for truck and car access;
- Single fire and utilities services ingress off Canal Road;

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- Site landscaping totalling approximately 7,464sqm (or 21.6% of the site), including two 6-metre landscaped setback areas to both Burrows and Canal Roads site frontages and Canal Roads site frontages and the following provisions:
 - 5,293sqm or 15.3% deep soil landscaping; and
 - 5,074.82sqm or 14.7% tree canopy coverage;
- Provision of building / business identification signiation; and
- Provision of two chamber substations.

Council understands that the facility is proposed to operate 24 hours per day, 7 days a week.

General Feedback

Aligning with previous feedback, Council continues to recognise that the proposed development positively contributes to the current and future role of Mascot. The industrial and business precinct around Mascot is a critical component of the International Trade Gateway and is key employment land within the Eastern City District. The employment opportunities associated with the proposed development are consistent with the *Greater Sydney Region Plan*, *Eastern City District Plan*, and *Future Transport 2056*.

Response to SEARs

Bayside Council previously provided a response to the SEARs to Goodman Property Services (Australia) Pty. Ltd. (Goodman) on 5 September 2022. Council acknowledges that a project response was provided within the *Engagement Summary Table* (Appendix D) of the EIS.

In the initial response to SEARs, Council addressed zoning controls listed within the *Sydney Local Environmental Plan 2012* (SLEP 2012) that IN1 *General Industrial* zoned office usage must be ancillary to the proposed 'warehouse and distribution' usage. Council recognises that Appendix D of the EIS addressed this concern by stating that:

"The proposed office component will be ancillary to, and in support of the primary purpose of the facility for 'warehouse and distribution' use.

No standalone office use will be accommodated within the facility."

As addressed in Appendix D of the EIS, Council acknowledges that traffic impact is speculative. As the site is zoned IN1 *General Industrial*, traffic is assumed to support 'warehouse and distribution' usage. Council acknowledges flexibility is required and has been appropriately considered within the *Transport, Traffic & Accessibility Assessment* (Appendix O) of the EIS.

While traffic concerns were adequately addressed within Appendix D, Council officers do not agree that concerns relating to Visual Impact and Active Transport were sufficiently addressed. Having reviewed the EIS, further detailed comments are provided below.

Visual Impact

Council recognises that a response was provided to Bayside Council's initial comments on the SEARs that addressed visual impact concerns, however, some concerns still exist in the EIS.

Council officers raise concern with the visual appearance of open vehicular ramps, which may appear unsightly when entering the Bayside LGA along Canal Road. *View 04* within the *Visual Impact Statement* (VIA, Appendix N) illustrates this viewpoint. Within the project response of Appendix D of the EIS, it is stated that several species capable of growing approximately 30m high will be included within the landscape setback. However, the

Landscape Plans (Appendix P) describe the tallest trees as being capable of growing to 20m height, occurring in only two species. The *AIA* (Appendix Q) identifies three trees on site that are capable of 30m growth, however two of which are planned for removal. Due to the removal of large trees, Council's Landscape Architect noted that some renderings included within the EIS have exaggerated the size of retained trees, recommending that proper scale be included for a more accurate representation.

Council's Landscape Architect also raised concern that the close proximity to the building will limit the future possible maturation of tree species within the 6 metre setback. Further, almost all retained trees are currently planned to have footpaths and/or roads encroaching their Structural Root Zone (SRZ) and Tree Protection Zone (TPZ). Council recommends further mitigation measures to ensure proper care of new and existing trees as advised within the *AIA*, permitting adequate space for mulching and care requirements in the SPZ and TPZ of all trees during the construction and operation stages of the proposed development.

Council recognises that overhanging roof vegetation has been implemented to screen vehicular ramps. Council recommends additional screening of the vehicular ramps by means of additional vegetation, or appropriate materials assimilating with the built form and public domain, in order to create a more visually appealing appearance.

It is noted that the visual impact of the 210m wide and 25m high façade along Burrows Road is intended to be broken up through use of three materials along three equal bands, and a 6m wide setback. Given the wide façade, Council notes that *View 03* of the *VIA* is unable to demonstrate the full view of the proposed development. An image highlighting the full extent should be included to demonstrate the visual impact of the development more accurately. Furthermore, Council officers request two additional viewpoints to the *VIA*, listed below:

1. Views looking west from Gardeners Road, near the Kent Road intersection, are listed in the *VIA* as having high visibility of the proposed development. This location is also the boundary of the high-density Mascot precinct; and
2. Views from the foreshore of the Alexandra Canal from the Bayside border. The Alexandra Canal, including the sandstone embarkment, is classified as a State heritage item (1260) under the *Bayside Local Environmental Plan 2021*. This area may become a future pedestrian area as Coward Street and the broader Mascot precinct becomes increasingly promoted as a 'place for people', becoming a walking and cycling friendly area (embedded in the District and Local strategic planning policy framework).

It is noted that programmable light art is intended to be utilised to reflect the concepts of change and movement, and create a visually appealing canvas. Additional renderings should be presented demonstrating the possible visual impact this may have on Bayside residents at night.

Active Transport

Council noted within their response to the SEARs that the site is located close to cycleways highlighted within the State Government's *Sydney Gateway Active Transport Strategy*, and that integration of safe cycleways and road crossing design is included in the design for this project. The project response to this states that this has been considered within the proposal.

The *Transport, Traffic & Accessibility Assessment* (Appendix O) specifies targets of increases to train and cycling commutes, anticipating an increase of 8% and 7% of these transport modes, respectively. The EIS outlines that this target is to be achieved through

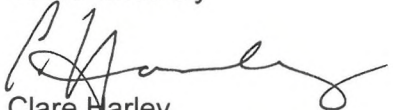
provisions of 73 total bicycle parking spaces and end-of-trip provisions at the site, as well as a 'welcome pack' provided to new staff that will include a Travel Plan pamphlet and other information in relation to sustainable transport choices. Additionally, the EIS suggests that footpaths will be Shared Footpaths, utilising space for both pedestrian and cycle access.

Council recognises that current plans to accommodate pedestrian and cycle access include the maintenance and improvement of footpaths along Burrows and Canal Roads with the 6m landscape setback. In order to properly accommodate for active transport, Council recommends that appropriate Shared Footpath width should be provided. Council further recommends that the proposal takes into consideration the *Sydney Streets Code 2021*, which states that Shared Pathways designs should be at a minimum 2.8m width, with a preferred width of 3.2m or more. Further, the *City of Sydney Shared Pathway Pavement Markings Guide* specifies that all Shared Paths should have Shared Path markings, line markings, symbols, and text elements.

In addition to Shared Pathway provisions, Council recommends that wayfinding signage should include local streets and public transport access points, supporting the *Mascot Station Town Centre Precinct Masterplan* and the *Eastern Harbour City Strategic Cycleway Corridors Program*.

If you require any further information please do not hesitate to contact Matthew Hammond, Urban Planner on (02) 9562 1621 or via email: matthew.hammond@bayside.nsw.gov.au.

Yours sincerely



Clare Harley

Manager Strategic Planning

13.12.22.