

Pamela Morales

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**Re: State Significant Development Application SSD-58591961 - Building 2 Advanced
Manufacturing Research Facility**

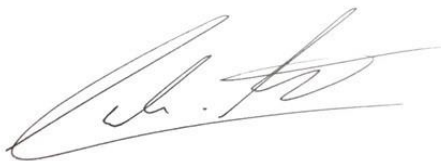
Dear Pamela,

Liverpool City Council was invited to provide comments on State Significant Development Application SSD-58591961 for the development of Building 2 Advanced Manufacturing Research Facility.

Attachment A of this letter provides detailed comments and information that WPCA may wish to consider in relation to the proposed design.

Should you require further information please contact Peter Nelson, Principal Strategic Planner on 0475 585 429.

Yours sincerely,



Luke Oste
Coordinator Strategic Planning

Attachment A – Detailed comments

1. Strategic Context

Infrastructure servicing

The “Building Two Advanced Manufacturing Research Facility (AMRF2) SSDA Report – Infrastructure Servicing Strategy, Reference: AMRFB2-ARU-REP-MEP-000001, Dated 8 December 2023 provides no certainty in relation to the provision of sewer infrastructure to the site. The Infrastructure Servicing Strategy identifies where a sewer connection may be made available, however no indication as to the timing of the availability of this infrastructure is provided. The proposed use requires the provision of wastewater and trade wastewater services which must be provided via a connection to a gravity fed Sydney Water sewerage system.

This is also the case with potable water where the Infrastructure Servicing Strategy indicates where a water main may be available in the future but does not provide an indication as to the timing of the availability of this infrastructure.

The proposal does not provide sufficient certainty to demonstrate compliance with SEPP (Precincts – Western Parkland City) 2021 which requires:

4.49 Public utility infrastructure

(1) Development consent must not be granted to development to which this Division applies unless the consent authority is satisfied that—

- (a) public utility infrastructure that is essential for the development is available, or
- (b) the public utility infrastructure will be available when required.

(2) In this section—

public utility infrastructure includes infrastructure for the following—

- (a) the supply of water,
- (b) the supply of electricity,
- (c) the disposal and management of sewage.

Development contributions

Council is still awaiting confirmation as to the status of the exhibited Draft Aerotropolis 7.12 Contributions Plan. As a contributions plan has not yet been approved for the land to which the application relates, the current proposal cannot be determined, as specified under Clause 66 of the Environmental Planning and Assessment Regulation, see:

66 Contributions plans for certain areas in Sydney—the Act, s 4.16(1)

(1) A development application for development on the following land must not be determined by the consent authority unless a contributions plan has been approved for the land to which the application relates—

(c) land shown on the Land Application Map under State Environmental Planning Policy (Precincts—Western Parkland City) 2021, Chapter 4.

(2) The consent authority may dispense with the requirement for a contributions plan if—

(a) the consent authority considers the development application is of a minor nature, or

(b) the developer has entered into a planning agreement for the matters that may be the subject of a contributions plan.

The relevant DPHI team have indicated that the finalisation of the Draft Contributions Plan is imminent.

Landscape led approach

Section 8.2 of the exhibited draft Masterplan indicates that each lot is to “achieve canopy cover of at least 15% of the site area” and that “All lots are to achieve deep soil of at least 10% of the site area.”

The ground floor plans identify a Lot area of 5996m² of which approximately 424m² is available for deep soil planting, (noting that portions of the nominated deep soil area do not provide the minimum required dimensions or are located over areas of basement). This represents 7% of the lot area available for deep soil planting, which represents a deficiency of 175.6m². This deep soil calculation has been provided in accordance with the definition under Appendix A of the Western Sydney Aerotropolis DCP which defines deep soil as:

A landscaped area of de-compacted deep soil with a minimum dimension of 3m by 3m, connected horizontally to the soil system and local ground water system beyond and is unimpeded by any building or structure above or below ground with the exception of minor structures. Minor structures are defined as (a) a path, access ramp or area of paving with a maximum width up to 1.2m (b) essential services infrastructure (such as stormwater pipes) with a maximum diameter up to 300mm (c) landscape structures (such as lightweight fences, light poles or seating) requiring a footing with a maximum size of up to 300mm x 300mm in cross section.

The calculated 2.5% (152m²) on lot canopy coverage provided within the architectural plans (Tree Canopy Plan, Drawing No LA-SSDA152, Revision 0, Dated 18/12/2023, Prepared by Architectus) indicates a shortfall in canopy provision for the site of 747.4m².

It is disappointing that the plans represent a further decrease, in the provision of both canopy coverage and on lot deep soil provision, from the minimum requirements under the Bradfield City Centre Masterplan. This is especially the case as the Masterplan already represents decrease in both on Lot deep soil and on Lot canopy area provision from the DCP.

This is represented in the following table:

Controls	Western Sydney Aerotropolis DCP	Draft Masterplan Amendments	Building 2 plans
Deep soil	25%	10%	7%

Canopy coverage	35%	15%	2.5%
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Council strongly encourages the provision of the maximum amount of deep soil area and tree canopy coverage on private lots and would recommend the amendment of the current plans to achieve this outcome.

Local Roads and Drainage

Council requests that the final detailed civil drawings for any local road and local drainage infrastructure that is intended to be handed over to Council for ownership and maintenance are provided to Council for consideration prior to construction.

It is also recommended that any future determination include conditions that require all critical stage inspections for local road and drainage to be undertaken in person by the principal certifier and that these inspections also be attended by Council's Development Engineers. Photographic evidence of all critical stage inspections of this infrastructure is to be recorded and included in a report of critical stage inspections, to be prepared by the certifier and provided to Council prior to the issue of any occupation certificate.

This approach is recommended to ensure clarity in relation to the design, construction and certification of local roads and infrastructure to be handed over to Council and to limit the potential for future delays at the time of handover.

Post determination conditions

Council requests that the any future SSDA determination include conditions of determination prescribing that:

- The details of the certifying authority are provided to Council in writing.
- All post determination correspondence and post determination conditions that require Council involvement are forwarded to Council through the principal certifier only.

This approach is recommended as Council is not the determination or certification authority. Post-determination issues should be managed by the certifying authority.

2. Flood Plain Engineering

Council notes the following:

- AMRF2 works are located outside the AMRF 1 interim stormwater works and it will not utilise this temporary stormwater infrastructure.
- AMRF2 is reliant on the operation of the Stage 2a Works (temporary regional arrangement) which is forecast to be completed by mid-2025

- The permanent regional treatment infrastructures are also targeting to complete mid 2025.

As AMRF2 is reliant of temporary regional stormwater management arrangement (Stage 2a works) and/or permanent regional stormwater management arrangements, it is recommended that an Occupation Certificate should not be issued for the subject building until the construction of the above stormwater management infrastructure is completed.

3. Traffic and Transportation

3.1 It is noted that the proposed surrounding roads which provide access to the subject site are included as part of stage 2 enabling work. Confirmation is required on delivery timing of the surrounding road network. An Occupation Certificate should not be issued to the subject building until the surrounding road network including Metro link road, Innovation North and Central Loop West are completed.

Alternatively, interim access arrangement should be proposed and included as part of the TIA report.

3.2 Clarification is required about road classification, ownership and maintenance responsibilities for the proposed road network and street lighting, particularly the road network adjacent to Sydney Metro station. Confirmation is required regarding the end treatment of Road 3 (Innovation North) at the Metro Station.

3.3 Clarification is required whether any driveway is proposed along Central Loop West Road. It is preferred all the vehicular access is via the proposed service road.

3.4 A Section 138 application must be lodged via Council's online planning portal for civil design and road construction works on any public road.

3.5 Any traffic control device, parking, pedestrian and cyclist crossings and regulatory signage and linemarking plans must be submitted to Council's Transport Management Team to be presented to Liverpool Local Traffic Committee meeting for endorsement and Council's approval.

3.6 Consideration should be given to use bicycle parking area for temporary car parking spaces during initial development stages until the surrounding cycle network and infrastructure are completed.

3.7 A construction traffic management plan should be prepared and submitted to Council/TfNSW for endorsement as part of Section 138 application.

3.8 An updated Green Travel Plan is to be provided prior to the OC being issued to the subject development site, which includes (but not being limited to):

- a) The proponent is to nominate a Green Travel Plan coordinator to set up the steering committee and include the relevant contact details (both building manager and Council's representative) in the updated plan.
- b) A GTP information pack which includes available public and active transport, car parking provision, car share membership information, parking and travel demand management tools, is to be prepared and distributed to tenants and visitors.
- c) WPCA should develop an overall GTP framework and guideline for all the building sites in Bradfield City Centre and ongoing monitoring and review system such as coordination and governance, review and improvement process, and online platform to provide information on public transport and other incentive programs and public events to promote public and active transport usages.

3.9 The basement design is to be supported by turning templates that demonstrate that all vehicles are capable of entering and exiting the basement in a forward direction. Specifically the rigid vehicles included in the Basement Level 1 loading area must be demonstrated to be capable of entering and exiting the basement in a forward direction. If the current design does not permit vehicles to enter and exit the site in a forward direction, it is recommended that the basement parking design is amended to comply with this requirement.

4. Urban Design and Public Domain

4.1 Context

- 4.1.1 Council recognises the vital role of the AMRF 2 building in the Aerotropolis and is in principle supportive of the overall well considered proposal with innovative construction and sustainability technologies and strategies embedded.
- 4.1.2 The Design report states that AMRF 2 '*represents a culmination of collaborative efforts, paying homage to Indigenous knowledge, sciences and technologies.*' Council highlights the opportunity for this precinct to be a unique place for the public to visit, and for the development to share knowledge of its embedded advanced technologies, to promote education and inspire various generations. Council requests the applicant to demonstrate how the unique knowledge embedded in the precinct will be accessible and shared with the public, particularly throughout the public domain.
- 4.1.3 Council commends the Connecting with Country approach including deep understanding of the Country the project sits within, recognising Aboriginal knowledge as science, and the design principles that have informed the design. Council encourages the applicant to seek opportunities in the public domain to share aspects of this approach - where culturally appropriate, with those who visit this place to increase awareness and promote caring for Country. For example the design principle of water and integrated rainwater collection system.

- 4.1.4 Council notes there are security requirements due to the nature of the uses within the building. However the building has a unique internal landscape courtyard, connecting with the AMRF park green space, both a positive contribute to public open space in the Bradfield City Centre. Council seeks clarity on where the secure lines are throughout the public domain, what is accessible to the broader community, limited to students and staff and which areas have VIP access only. It is noted there are access and circulation diagrams in the Design Report, however Council seeks secure lines and circulation overlayed on a ground floor plan, and clarity on where fence or gate lines are.
- 4.1.5 It is understood the proposed AMRF 2 building, AMRF 1 Building under construction and AMRF Park are each intended to form part of a unified precinct, however these are being designed and delivered at different times by different project teams. Council requests a Public Domain Plan be provided that includes both AMRF 1 and AMRF 2, demonstrating seamless connection of the public domain for both projects. This should include floor finishes, treatments, RLs planting, species, footpaths, furniture, fixtures, planters, lighting, planting walls and any retaining.
- 4.1.6 There are RLs missing on the ground floor levels in AMRF 2, AMRF park, the main entry and the areas throughout the central landscape area. The applicant should provide more RLs in revised documentation.
- 4.1.7 The landscape drawings and public domain plan should show the extent of work beyond the site boundary up to the road edge. The Service Road is where the main entry addresses and is accessed by, yet there is little information about this road shown. The applicant should demonstrate the public domain consideration appropriate for a main entry, and more detail of the Service Road including footpaths, kerbs, any planting, trees and connection to the cycleway. Confirm whether this road will be shared with pedestrians.

4.2 Built Form + Scale

- 4.2.1 Council appreciates the 3D visualisations provided in clearly communicating the design intent however note none of those provided illustrate the main entry which is understood to be from the Service Road. Council is concerned that the Main entry is from a service road - reduced in width and subject to significant heavy vehicle access for this building and the future buildings across the road. The main entry is also directly next to the significantly scaled car park and loading vehicle entry, and the alternate secondary entry from the North is completely internalised from the street. Council requests the applicant provide a 3D visualisation of the main entry, and consider measures to clearly delineate the main entry from the basement entry.
- 4.2.2 The building design has excellent transparency and visual activation on the facades that are internalised - facing the internal courtyard and AMRF Park, however Council is concerned this has resulted in the street frontages at ground level being inactivated and dominated with long blank walls. This is at risk of creating poor passive surveillance and amenity for the public domain at street level, a poor outcome for a City Centre streetscape.

In particular, the Central Loop West façade shows long expanses of blank façade, when it is intended to be a prominent street for pedestrian activity. Council recommends more consideration of passive surveillance and transparency of the building to the public domain that interfaces with the street.

- 4.2.3 The Draft Bradfield City Centre Masterplan Design Report dated (dated October 2023) indicates minimum requires for activate frontages and blank walls and services. Council requests the applicant demonstrate consistency with the active frontages requirements of Bradfield City Centre Masterplan.
- 4.2.4 Council notes the Bradfield City Centre Masterplan (dated October 2023) is in draft format and currently under review. This will contain further information regarding appropriate setbacks. The Draft Masterplan Design Report indicates 0m setbacks are permitted for this site, therefore the current proposal would be consistent, however this will need to be reviewed once the Bradfield City Centre masterplan is finalised.

4.3 Density

NIL.

4.4 Sustainability

- 4.4.1 Promoting active transport is vital to the Aerotropolis precinct. Council requests the applicant provide circulation diagrams demonstrating how people arriving by bicycle can arrive at the AMRF 2 building from the surrounding cycle paths to the bicycle parking.
- 4.4.2 The bicycle parking and end of trip facilities are all located in the basement and appear to be accessed via lift 3 only. Council encourages the applicant to provide an alternate mode of access without relying on a lift. If this is to be provided via the driveway, a separate cycle path should be provided entering the driveway and to the bicycle parking, enabling safety from cyclists and entering vehicles.
- 4.4.3 The Aerotropolis developments will have significantly large roof spans contributing to the Urban Heat Island Effect. Council commends the bio-solar roof with planting and photo-voltaic cells, setting a precedent for future developments in the precinct to mitigate their impact to the Urban Heat Island Effect.
- 4.4.4 The development includes 5 x EV Charging spaces, which is 5% of the parking spaces. Considering the significance of this building to the City Centre, and advanced technology and sustainability ambitions, Council recommends a higher percentage of EV Charger spaces be provided, setting a precedent for future developments and future proofing the building.

4.5 Landscape

- 4.5.1 Liverpool LGA experiences severe Urban Heat Island Effect, and the Aerotropolis area is particularly vulnerable with future industrial development. Consistency with Council's canopy cover and deep soil requirements is vital for the future environmental health of the area.

The tree canopy plan and calculations have been provided with AMRF Building 1 and AMRF Building 2 combined, including the AMRF Park. To be able to review canopy cover, it is important it is understood at the individual lot scale, and also as a broader site. The Western Sydney Aerotropolis DCP 2022 recommends for commercial areas – 35% minimum tree Canopy Target. The Bradfield City Centre Draft Masterplan Report states at the individual lot scale canopy cover should be 15% and has more specific targets when considering open space. Council notes the importance of the AMRF 2 building as being a catalyst for the precinct and precedent for future developments. Currently only 9.5% is proposed when consolidated with AMRF Park and AMRF Building Council encourages the applicant to investigate increasing canopy cover and provide further information on how this site will respond to the canopy targets set by the DCP and/or the Bradfield City Centre Masterplan.

- 4.5.2 Council requests the applicant provide a consolidated deep soil calculation including AMRF Building 1 and the AMRF Park.
- 4.5.3 There is little information provided on the street tree species, spacing, mature height, pot size etc. Council requests this information be provided, or confirmation if it is being provided as part of a separate application.

5 Safety

- 5.1 The main entry is adjacent to the driveway with heavy vehicles frequently entering and is of significant safety concern. Council requests the applicant provide information on how safety concerns between pedestrians, cyclists, cars and heavy vehicles are being addressed.
- 5.2 Council requests the applicant demonstrate how pedestrians are prioritised and safety considered when crossing the driveway. A continuous pedestrian footpath running in front of the driveway that prioritises pedestrians, and vehicle calming strategies are recommended.

5.6 Amenity

NIL

5.7 Housing Diversity and Social Inclusion

NIL

5.8 Aesthetics

- 5.8.1 Council commends the overall approach to the façade in materiality, quality of detailing, composition and integration of the internal systems as part of the façade design.

- 5.8.2 Council recommends that the proposal is amended to include the provision of public art in accordance with the WSA DCP.