

16 September 2015

Industry Assessments  
Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

**Attention:** Rebecca Sommer

Dear Rebecca,

**Re: SSD 6799 Swire Cold Storage Facility, Sydney Business Park, Marsden Park**

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I refer to your correspondence dated 10 August 2015, requesting that Council provide comments on the proposed State Significant Development lodged under Part 4 of the *EP&A Act 1979* for the Swire Cold Storage Facility.

The proposal has been reviewed by Council officers and is not supported in its current form. While it is acknowledged that an attempt has been made to provide a variety of materials and finishes, it is considered that the site can only accommodate a proposal of this scale if it exhibits high quality architectural design, which further articulates the expanses of colourbond material fronting a prominent part of the precinct. A range of issues have been raised and listed in **Attachment A** to this letter, which are requested to be addressed to Council's satisfaction by the Proponent before any determination of the proposal is made by the Department. It is requested that Council be given the right to reply to any new information lodged by the applicant, and if satisfactory, be given the opportunity to provide conditions to be included in any consent issued.

If you would like to discuss this matter further, please contact me on 9839 6228.

Yours faithfully,



Judith Portelli

Manager Development Assessment

## ATTACHMENT A

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The following concerns are requested to be addressed:

### Planning

1. Whilst the economic need for the high-bay component is acknowledged, it is considered that the Clause 4.6 request is not well-founded, for the following reasons:
  - a. The non-compliance represents a significant 18.8m departure from the height of building development standard (equivalent to 117% or over double), noting that the lower component of the building also breaches the 16m height standard by up to 4.3m at the ridgeline (representing a 26% variation).
  - b. This proposal is located in a prominent part of the estate on the corner of two sub-arterial roads. The high-bay component has dimensions of 57.1m x 126.8m, comprising 70% of the southern façade to Hollingsworth Road and 43% of the western façade to Road No. 2. Therefore, the proposed height exceedance will be readily visible by the public in a part of the precinct that is subject to the lowest height standard.
  - c. No analysis or supporting information in the form of photomontages and streetscape elevations along Hollingsworth Road and Road No. 2 have been provided to demonstrate the effect of the variation on the desired future character of the locality and bulk and scale in the streetscape.
  - d. Further, no analysis or supporting information has been provided to demonstrate the effect of the proposed height variation in terms of impact on the skyline and views lost from Richmond Road when compared with a compliant proposal.
  - e. No shadow diagrams have been submitted to demonstrate that the additional height proposed will not adversely impact any adjoining properties.
  - f. It has not been demonstrated that the proposed design of the development exhibits a high quality built form in an appropriate location in accordance with the relevant objectives (b) and (d) of the Height of Building standard.
2. Any approval would significantly change the desired future scale and form of development as currently set out in the Marsden Park Industrial Precinct Plan. Due to the likely precedent to be set in the event of approval, consideration should be given to revisiting the precinct-wide Height of Building development standards under an amendment to the SEPP. This should only be on the basis of architectural design excellence being demonstrated.
3. It is acknowledged that an attempt has been made to provide a variety of materials and finishes. However, it is considered that the site can only accommodate a proposal of this scale if it exhibits high quality architectural design, which further

articulates the expanses of colourbond material fronting public roads in a prominent part of the precinct. For example, further consideration should be given to the use of a variety of external structures, finishes, etchings, recessed patterns, vertical garden 'green' walls, upper storey display windows, and protrusions and penetrations in building elements. In this regard, it is considered that the controls and objectives of Sections 6.4.2, 6.4.3 and 6.4.5 of the Blacktown City Council Growth Centre Precincts Development Control Plan (BCC Growth Centres DCP) 2010 have not been satisfactorily addressed.

4. Details of screening to all tanks that are proposed to be visible to a public road / place.
5. Full details of external finishes and colours including photomontages. Council is very concerned at a lack of architectural merit and treatment to the 33m high building. The plans provide no mix of colours and finishes. The colours are considered to be too dark and will impact on the skyline.
6. Particular concern is raised with the elevation to Hollinsworth Road, which is a major collector road, the elevation is unacceptable in its current form as it is just a 'shed' with no mix of finishes, the building should have more masonry elements.
7. Full details of all boundary fencing and any retaining walls including materials of construction shall be submitted as a part of the application.
8. Concerns are raised regarding the "empty pallet" areas located towards Hollinsworth Road. No storage of any goods is to be permitted within the setback to Hollinsworth Road. Any external storage areas are to be fully screened to the full height of the goods to be stored. Any screening of storage shall not impede sight distances for trucks or vehicles. Full details shall be submitted as a part of the application.
9. As raised in Council's correspondence dated 27 November 2014, the overall building design was considered to result in a poor presentation, and this concern remains as the proposal in its current is not considered to demonstrate high quality building design. This is particularly the case given the proposal is almost double the permitted building height and provides a built form which is considered to contravene the objective of clause 4.3 Height of Buildings as follows:

*"(d) to establish parameters for and promote a high quality built form."*

It is recognised that the central building form is the result of the internal functionality of the high bay storage system sought by the Proponent. However, this internal system does not constrain the exterior presentation of the building, which is capable of providing a high quality built form, as is the expectation of

other recently approved warehouse buildings within the Marsden Park Industrial Precinct. To maintain the quality of the new built forms in this precinct, the design of the building is required to be improved so as to demonstrate design excellence and comprise suitable architectural design measures. The proposal in its current form is not supported.

10. The absence of landscaping within the car parking areas and lack of communal open space is not supported, given it contributes to the dominance of hard-stand and the built form and reduces the level of amenity provided to employees. In this regard, it is considered that the controls and objectives of Sections 6.3.3 and 6.3.4 of the Blacktown City Council Growth Centre Precincts Development Control Plan (BCC Growth Centres DCP) 2010 have not been satisfactorily addressed.

### **Traffic**

11. While no objection in principle is raised with the proposal from a traffic management point of view in terms of access, internal traffic circulation and heavy vehicle movements, concern is raised with the proposed number of parking spaces.
12. The proposal only makes provision for 44% of the BCC Growth Centres DCP parking requirement based on the anticipated staffing number which may change in future and Council will have no control on it.
13. This is a significant departure from the DCP requirement, which may have negative impacts on surrounding developments.
14. It is considered that a maximum 30% departure (i.e. a minimum of 201 car spaces) from the BCC Growth Centres DCP parking requirement is reasonable based on the type of development and the survey undertaken at a similar development in Melbourne. Accordingly, amended plans should be provided demonstrating the provision of an additional 63 car spaces onsite either as permanent or overflow.