

Your ref: SSD 6799 MOD 1
Our ref: MC-14-2312

9 July 2017

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

Attention: Thomas Piovesan

Dear Thomas,

Modification to the Cold Storage Facility at Hollinsworth Road, Marsden Park

Thank you for your email, dated 5 June 2017, providing us the opportunity to comment on NewCold Sydney Unit Trust's section 96(2) request to modify the Swire Cold Storage Facility approval issued on 22 July 2016.

We have undertaken a review of the requested modifications, the planning report prepared by Urbis and the accompanying specialist studies, and have identified a number of concerns. Based on these concerns, we do not support the modified proposal in its current form.

To ensure that a high standard of development is produced, we request that serious consideration be given to all of the issues raised in Attachment A. Of particular concern is the external appearance and form of the building, and the lack of architectural merit.

We request that the application not be determined until our valid concerns are addressed. We also request that we be given the right to reply to any new information provided by the applicant, and if satisfactory be given the opportunity to recommend additional or amended conditions of consent.

Should you have any enquiries or wish to discuss this matter further, please do not hesitate to contact me on 9839 6228.

Yours faithfully,



Judith Portelli
Manager Development Assessment

Issues for consideration – SSD 6799 MOD 1 for the 'Swire Cold Storage Facility'

Town Planning matters

1. Height and lack of architectural merit

- a. Council officers have raised significant concerns in previous correspondence, dated 16 September 2015 and 12 January 2016, regarding the design and appearance of the development. These concerns are still held by Council officers. While an attempt has been made to vary the proposed materials and finishes, it is considered that overall the development does not demonstrate design excellence, and that any further increase to the height and scale of the building should not be supported.
- b. The following concerns have been raised by our City Architect:
 - i. The building significantly exceeds the 16 m height limit that applies to the site. The external appearance and form of the building therefore requires careful detailing. Appropriate material selection is also required to ensure that the development contributes positively to its surrounding context and does not have an adverse impact on the intended scale and character of the area.
 - ii. The applicant has submitted a detailed analysis of the proposed building materials (PIR panels) outlining the benefits of the product in relation to the efficient operation of the facility. The proposed materials have been selected because of functional and operational considerations. Whilst this is understandable, the aesthetic impact of the materials in conjunction with the proposed bulk and scale of the development must also be taken into consideration.
 - iii. The 3 design options presented for consideration are fundamentally the same, albeit with minor colour and pattern variances. The form is defined by functional and operational parameters rather than aesthetic or design considerations. All 3 options present as an over scaled development consisting of a singular material with no relief to the building facade through either material variance or articulation.
 - iv. The building façade does not provide any architectural merit and does not demonstrate design excellence. A building of this nature, that has a significant breach in the height limit, has the opportunity to provide design excellence and improved character of the precinct. The proposal in its current form does not contribute positively to its context.

- v. The office component of the development does not provide any additional visual interest on site. The office comprises standard curtain walling and metal cladding with no attempt made to exhibit any element of aesthetic interest.
- c. It is considered that the controls and objectives of sections 6.4.2, 6.4.3 and 6.4.5 of the Marsden Park Industrial Precinct Development Control Plan (DCP) 2015 have not been satisfactorily addressed. For example, Clause 6.4.2 states that the built form and architecture of buildings located at street corners should enhance its location and positively respond to and emphasise the street corner. The applicant's submission (page 10 of the assessment table) responds to this requirement by stating that the *"development site is not considered to be a corner site"*. The site, however, has 3 street frontages and is located in a prominent part of the estate on the corner of 2 sub-arterial roads. It is therefore considered essential that the design and appearance of the building enhance its significant location.
- d. Based on the above, we strongly object to the proposed building height and visual presentation of the development. It is considered that the development does not promote a high quality built form in accordance with objectives (b) and (d) of the Height of Building standard under Clause 4.3 of the Marsden Park Industrial Precinct Plan – Appendix 5 of the Sydney Growth Centres SEPP, and the proposed 36 m high building provides a lack of architectural merit.
- e. We therefore consider that the proposed additional height and increase in building volume should not be supported until the above concerns are addressed.

2. Landscaping

- a. The proposal relies heavily on dense landscaping and significant tree planting to screen the building. The perimeter landscaping is also critical to enhancing the area. A significant portion of the landscaped area, however, is provided within the TransGrid easement. Given that TransGrid does not permit trees to be planted under the transmission lines, any landscaping provided in this area will need to be low and will not grow to a height that will help screen the building. As landscaping cannot be relied on to screen a significant portion of the building, it is even more critical that the items listed under point 1 above are addressed.
- b. Condition C50 requires the applicant to prepare a landscaping and vegetation management plan in consultation with Council staff, and to submit this plan to the Secretary for approval. We would expect to see significant large scale trees species and for the trees to be established/semi-mature in order for the landscaping to have an immediate impact. It is recognised, however, that tree planting cannot be provided within the car parking area, across the majority of the Darling Street frontage or under the transmission lines. Consideration should therefore be given to amending the plans to provide deep soil tree planting zones adjacent to the front façade (Darling Street facade) of the building.
- c. The submitted planning report (page 8) proposes an amendment to condition C51. This reference should be C50. Items h., i. and j. within the existing condition should also remain.

3. Signage

- a. The approved signage ranges in size from 12.5 m x 2 m to 16 m x 2.5m. Currently there is no signage approved on the eastern elevation of the building adjacent to the neighbouring property.
- b. The proposed signage, measuring 25 m x 6 m, is significantly larger and therefore should be positioned a maximum of 16 m above the natural ground level (NGL) in keeping with the maximum height control for the site. Signage on the eastern elevation is considered unwarranted, given that the adjacent building will screen any sign provided at a height of 16 m.

4. External storage and screening

- a. We are concerned that the truck dispatch area, adjacent to the Hollinsworth Road frontage, could be used for external storage purposes when not being access by trucks. We do not support any external storage of goods within any of the setback areas, especially to Hollinsworth Road. All storage must be within the building or behind a suitably screened area. This issue should be addressed by way of a suitable condition.
- b. The plans nominate that the fire tanks will be screened. Conditions should be included requiring that the applicant submit details of any screening for separate approval.

5. Approved plans

- a. The application is seeking to update the list of approved plans. This includes deletion of the previously approved 'TranGrid easement plans'. This request should be referred to TransGrid for their considered and any deletion of the plans should only be with their concurrence.

Traffic & parking matters

6. Parking

- a. The site layout results in travel (walking) distances of over 300 m from the car park, including the accessible parking spaces, to the building entry and offices. The car parking spaces are therefore considered inappropriately located. Furthermore, no details have been provided of the proposed covered pathway. The car parking area, including the accessible spaces, should be relocated adjacent to the building entry.
- b. The proposed development requires a minimum of 311 car parking spaces. The approved development consent, however, only requires that 128 spaces be provided. This is a significant variation from the minimum parking requirement under the DCP. We object to a further reduction in the number of car parking spaces on site for the following reasons:

- i. The planning report indicates that there will be 65 staff working during the morning shift (i.e. till 1pm) and 55 staff working during the afternoon shift (i.e. from 1pm). This suggests that there will be 120 staff at the change over time. A further reduction in the number of car parking spaces (i.e. to 104 spaces) is therefore considered inadequate for the current staff numbers.
- ii. The current number of car parking spaces being proposed, is based on current anticipated staffing numbers. These may change in the future and Council will have no control over it. A further reduction in the amount of on-site parking will not cater for any future increase in staff numbers.
- c. We consider that an area should be set aside for additional car parking to be provided in the future, so that parking provisions can comply with the minimum requirements of the DCP if the demand arises. At the very minimum, no further reductions should be given to the approved 128 car parking spaces. Any further departure from the minimum DCP parking requirement may have negative impacts on the surrounding developments in the future, and should not be supported.

Environmental health matters

7. Preliminary hazard analysis

- a. The Preliminary Hazard Analysis (report no. Q16-086 prepared by Blackie Mendham Pty Ltd and dated 13 April 2017) concludes that the risks at the site boundary are not considered to exceed the acceptable risk criteria. As such, the facility would only be classified as potentially hazardous and would be permitted within the current land zoning for the site.
- b. The recommendations provided in the Preliminary Hazard Analysis should be implemented and addressed as a condition of consent. Notwithstanding the conclusions in section 8.0 of the report, the following additional recommendations are made:
 - i. Gas detectors and isolation valves are to be included within the facility design to isolate the ammonia systems in the event of ammonia detection.
 - ii. Protection equipment (i.e. isolation valves, gas detectors) is to be inspected and tested a minimum of once every 6 months.

General comments

8. We request that the application not be determined until our valid concerns as outlined above are addressed. We also request that we be given the right to reply to any new information provided by the applicant, and if satisfactory be given the opportunity to recommend additional or amended conditions of consent. However, should the Department intend to approve this application, it is requested that suitable conditions be imposed to address each of the concerns raised above. This includes a specific

condition requiring that prior to the issue of any Construction Certificate, amended plans providing architectural features which break down the bulk and scale of the building and which ameliorates the visual presentation of the overall structure, be submitted to the satisfaction of the Blacktown City Architect. The amended facades must also be complemented with appropriate landscaping to the satisfaction of Blacktown Council's landscape architect.