

16 May 2022

Our Ref: R/2022/5
File No: 2022/275021
Your Ref: SSD-32489140

Catriona Shirley
Senior Environmental Assessment Officer – Industry Assessments
Department of Planning and Environment

Via Planning Portal

Dear Catriona

SSD 32489140 – Ascent Logistics Centre, Alexandria – Advice on EIS

Thank you for your correspondence dated 8 April 2022 inviting the City of Sydney Council (“the City”) to comment on the proposed development for a new multilevel warehouse and logistics centre.

The City has reviewed the submitted Environmental Impact Statement (EIS) is concerned about the architectural language of the building, building bulk and massing, the use of excessive patterns and materials that increase the visual dominance of the project and the lack of clarity relating to pedestrian entrances to the site.

In its current form, the City does not believe the application satisfies the provisions of Section 6.21C of the Sydney Local Environmental Plan 2012. Further, as the development has not gone through any formal competitive design process, the City recommends the application be reviewed by the State Design Review Panel for further consideration.

Further matters for your consideration are provided as follows:

1 Landscaping

The City encourages all new developments to strive to contribute to the City’s goal of achieving an overall green cover for the Local Government Area of 40%, including 27% tree canopy cover as per the targets and minimum of 15% for private sites. This can be achieved by providing genuine deep soil planting at the ground floor and additional site greening on rooftop areas and the provision of landscaped walls.

The submitted Landscape Design Report indicates that a total of 16% canopy cover will be provided across the site, however, the plans from which this percentage is based are misleading as they are showing existing canopy cover in the calculation provided by trees that are proposed for removal. The calculation also includes the area of canopy which overlaps onto the public domain. The Sydney Development Control Plan 2012 provision only includes calculation of canopy cover within the site.

It is recommended that additional tree planting is incorporated into the proposed design. This could be increased through additional tree planting within rooftop carpark which currently shows an excessive amount of hard surface and is discussed further below.

The City notes that the provision of deep soil within the site appears to be miscalculated. There is a large portion to the north-east corner of the site that is overhung by the ramp leading up to the car park, and accordingly is not considered deep soil. Secondly, almost half of what is proposed is permeable paving that is not adjacent to unencumbered deep soil, nor does it support any tree planting. The building envelope should be modified to have less site coverage and provide at least 15% canopy coverage in true deep soil in addition to contributing further to site greening and canopy coverage.

Further, the Level 1 car park is a large expanse of unshaded concrete. Some small trees are proposed but they will provide limited shade in such a tough microclimate, if they are at all viable. No detail is provided on the planting conditions of these trees. More, larger canopy trees in this space would provide a much-improved outcome in terms of the comfort and function of the car park, but also in terms of reducing the urban heat island effect.

In regard to the Level 2 courtyard, Section D of the submitted landscape package shows the planters to the courtyard rely heavily on mounding to achieve the necessary soil depth for planting. Mounding to this degree is not supported by the City, and it is recommended that the planter walls be increased in height to provide a minimum 800-1000mm of soil depth at the edge of the planter. If a seating edge is required, incorporate more bench seats or duplicate the wall with a lower one in front for seating

The City requests that any amended submission address and incorporate the following recommendations:

- Modify the building envelope to provide at least 15% canopy coverage in true deep soil that provides for tree planting and water infiltration.
- Provide a typical section through the car park tree planters ensuring adequate soil depth and volume as per the Sydney Landscape Code.
- Provide substantially more, larger canopy trees within the car park to create shade and reduce the urban heat island effect. Generally, 1 tree per 4 parking spaces is recommended.
- Increase planter walls to the level 2 courtyard to provide 800-1000mm of soil depth at the edge of the planter. If a seating edge is required, incorporate more bench seats, or duplicate the wall with a lower one in front for seating.
- Provide a detailed section through the 'biodiversity green roof' to confirm soil depth and overall planter build-up.

2 Building setbacks

The proposed building does not present a high-quality frontage and does not comply with the building envelope and 6m setback to Bourke Road as required by the SDCP.

The City notes the modelling of the facade increases the visual dominance of the reduced setback and the intrusion of the building into the street setback may have an impact on planting.

It is recommended that building massing be rationalised and be located within the site respecting a clear 6m setback to Bourke Road open to the sky with no upper level encroachments.

Further, a 3m landscape setback is required along Gardeners Road, and all landscape setbacks are affected by existing service easements. The landscape documentation illustrates compliance with these easements however, more detail is required to confirm the necessary conditions for planting large trees directly adjacent to these easements. If

root barriers are required, it is unlikely that the proposed trees will be able to achieve a reasonable or balanced root plate. It is recommended that any future submission include detailed sections of the conditions for either side of the service easements within the landscape setbacks, confirming any requirements for root barriers or similar which might impede the development of a balanced root plate for adjacent trees.

3 Tree management

The City notes that a total of 26 trees will be affected by the proposal. This includes 16 trees proposed for removal and the remaining 10 trees proposed for retention and protection. The following tree numbering has been adopted from the Arboricultural Impact Assessment – Revision B prepared by Bradshaw Tree Consulting dated 15 March 2022.

The City raises no objection the removal of trees numbered 1, 16, 17, 18, 19, 20, 21, 25 and 27. The majority of these trees are rated as being Low Landscape Significance and Low Retention Value and replacement planting within the site will compensate for the loss of amenity and canopy resulting from the removal of these trees.

The City also supports the retention of trees numbered 7-13 and 22-24. All trees to be retained shall be protected in accordance with *Australian Standard AS4970 Protection of trees on development sites*. A revised Tree Protection Specification and Tree Protection Plan is recommended to be developed to ensure adequate tree protection measures are implemented which reflect the final designs.

The City does not, however, support the removal of Trees 6 and 14. The plans indicate a new pedestrian footpath is proposed in the north-western corner. The alignment of the footpath necessitates the removal of Tree 6 which is rated high Landscape Significance and High Retention Value. Similarly, the plans indicate a new vehicle entry / exit point is proposed on the Bourke Road frontage. This is located adjacent to another entry/exit point located further south. The proposed driveway alignment necessitates the removal of Tree 14 which is rated high Landscape Significance and High Retention Value.

The removal of high Retention Value trees should be avoided wherever possible. New designs should accommodate and retain high valued trees unless they are substantially restricting any development from occurring. This is not the case at this site as the trees are located close to the property boundary.

High Retention Valued trees are considered important and should be retained and protected. Design modification should be considered to accommodate the Tree Protection Zone (TPZ) setbacks as prescribed by the *Australian Standard AS4970 Protection of trees on development sites*.

4 ESD

The City has reviewed the submitted ESD report and notes the proposal is referencing GreenStar Design and the As Built rating tool. This rating tool is no longer used, and all references and targets should be amended to refer to GreenStar Buildings. The City expects GreenStar Buildings targeting a 5-star rating for this type of development.

The City also expects the commercial office portion of the site to comply with the 5.5 Star NABERS Office target, as would be required for similar developments incorporating commercial offices. Any amended proposal should demonstrate the commitment to achieving this NABERS rating. Further, any future roof plan must provide details of the indicative photovoltaic (PV) system size and annotations stated in kilowatt peak (kWp).

Further consideration should also be made to increasing greening cover on rooftop areas and relocating PV systems to other areas on the rooftop.

5 Height

It is noted that the proposal exceeds the 18m height control on the northern portion of the site. The City raises no objection to the height exceedance, subject to all services and plant (excluding PV) being concealed from views from the public domain. This needs to be demonstrated in any future submission of additional information. Additionally, the City may consider further height variations should additional PV systems of lightweight structures are located above proposed carparking areas, subject to further design consideration.

6 Transport and access

The City notes the proposed 64 bicycle parking spaces as satisfactory. The architectural plans, however, do not indicate a sufficient number of spaces for bicycle parking and should be corrected. Further, end of journey facilities has been provided but it is unclear whether the SDCP recommendation for 6 showers and 61 lockers has been met.

The City also notes the proposed 144 car parking spaces as satisfactory and recommends a condition be recommended that requires a suitable number of rooftop parking spaces be used for service vehicles and not commuter parking.

Further, the driveway widths for access off Gardeners Road (11.08m) and Bourke Road (10.03m) appear to be excessive when compared to the swept path analysis provided with the EIS. The City recommends all driveway width be reduced to increase safety for pedestrians crossing these driveways.

7 Waste

The application must address the *City of Sydney Guidelines For Waste Management In New Developments 2018*, which requires facilities to minimise and manage waste and recycling generated by the proposal and demonstrate adequate provision for servicing of the site in relation to loading demands, size of waste collection areas and methods of collection to/from and within the site. Measures to reuse or recycle at least 80% of construction and demolition waste, either on site or diverted for reuse and recycling with receipts sufficient to demonstrate the target will be achieved.

The waste and recycling generated during the operation is to be wholly located in a dedicated room or storage area. Storage areas are to provide adequate capacity for storing all the waste and recycling likely to be generated between collection cycles, based on expected waste generation and selected bin types and accommodate likely peak demand for waste storage capacity. Storage areas should reflect the equipment, infrastructure, manoeuvring space and potential future needs of the development. The waste and recycling storage areas must be detailed on architectural drawings.

The application must also address any potential litter and spillage from the activities during operation and how this can be avoided, minimised and managed. Documentation such as an operational waste management plan must demonstrate practices for the minimisation of litter generation and confinement of litter arising from the operation.

Further commentary from the City regarding waste management would require the submission of additional information to address the above relating to the management of operational waste and provision for servicing of the distribution centre.

8 Site Contamination

The City notes that a Detailed Environmental Site Investigation (DESI) has been carried out by JBS&G stating the site is suitable for the proposed use subject to a CEMP.

Where the DESI concludes that the site is suitable for the proposed use it is to be peer reviewed by a NSW EPA Accredited Site Auditor and a Section A Site Audit Statement submitted certifying that the site is suitable for the proposed use.

The DESI and a Remediation Action Plan (RAP) must be peer reviewed by a NSW EPA Accredited Site Auditor and include a section B Site Audit Statement or a letter of Interim advice from the Site Auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.

The City also requests input into any future condition of consent, should DPE recommend approval.

Should you wish to speak with a Council officer about the above, please contact Marie Burge, Senior Planner, on 9265 9333 or at mburge@cityofsydney.nsw.gov.au

Yours sincerely,



Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning | Development | Transport