

13 May 2022

Our Ref: SF22/1549
Contact: Nigel Riley – 02 9562 1781

Catriona Shirley
Senior Environmental Assessment Officer
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Shirley,

RE: Exhibition of Environmental Impact Statement, Ascent Logistics Centre, 520 Gardeners Road, Alexandria [SSD-32489140]

Thank you for the opportunity to provide comment on the exhibition of the Environmental Impact Statement (EIS) for the proposed multi-storey warehouse at Ascent Logistics Centre, 520 Gardeners Road, Alexandria. 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 site's location on the border with the Bayside LGA.

The Proposal:

An EIS was submitted to the NSW Department of Planning and Environment for the subject site on 23 March 2022. Council was notified of the exhibition of this EIS on 11 April 2022 and comment was requested by 9 May 2022.

The proposal is to redevelop the former Bunnings hardware and building supplies building on this site for the purpose of a multi-storey warehouse and distribution centre, comprising:

- A 3-storey building of up to 24.65m;
- Total GFA of 27,509 sqm, including 21,952 sqm of warehouse and distribution GFA and 5,557 sqm GFA of ancillary office space (floor space ratio of 1.45:1);
- Landscaping area of 4,511 sqm (hard and soft), with an additional 1,634 sqm of soft landscaping at second floor level;
- 144 car parking spaces, 3 car share spaces and 64 bicycle parking spaces;
- On-site amenities including gym and cafés; and
- Replacement of existing vehicular access from Bourke Road with two new access driveways from Bourke Road and widening of the existing Gardeners Road vehicular access.

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

General Comments

Postal address

PO Box 21, Rockdale NSW 2216
ABN 80 690 785 443

Bayside Customer Service Centres

Rockdale Library, 444-446 Princes Highway, Rockdale
Westfield Eastgardens, 152 Bunnerong Road, Eastgardens

E council@bayside.nsw.gov.au

W www.bayside.nsw.gov.au

T 1300 581 299 | 02 9562 1666

Although located in City of Sydney LGA, the subject site immediately adjoins Bayside Council area to the south. Redevelopment of the site could therefore have tangible cross-border implications for the Bayside LGA, including any current or proposed strategies, plans or interests of the Council in the vicinity. In this context the proponents did not contact Bayside Council prior to lodgement of the Environmental Impact Statement. It is noted that Item 25 of the Secretary's Environmental Assessment Requirements (SEARs) issued for the project stipulates that applicants must consult with "any relevant local councils". Given the site's close proximity to the Bayside LGA, this should have included consultation with Bayside Council.

Strategic and Statutory Planning Framework

Under Sydney Local Environmental Plan 2012, the subject site is located in the IN1 - General Industrial zone. The proposed warehouse and distribution centre is permitted with consent under this zoning. It is also broadly consistent with objectives for the IN1 zone:

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To ensure uses support the viability of nearby centres.

At a strategic level, the subject site is located within the Green Square-Mascot Strategic Centre. The proposed development is broadly consistent with the objectives, strategies and actions under the Greater Sydney Region Plan (GSRP) and Eastern City District Plan (ECDP), with regard to:

- Infrastructure aligning with forecast growth (GSRP Objective 2 and Strategy 2.1; and ECDP Planning Priority E1 and Action 3);
- Ensuring the freight and logistics network is competitive and efficient (GSRP Objective 16 and Strategies 16.1 and 16.2; and ECDP Planning Priority E9 and Actions 30 and 32)
- Retain and manage approach to industrial and urban services land (GSRP Objective 23 and Strategy 23.1; and ECDP Planning Priority E12 and Action 51); and
- Strengthening Green Square-Mascot Strategic Centre (ECDP Action 49).

The Future Transport Strategy 2056 recognises the site as occurring within a "city-shaping corridor", connecting the Harbour CBD with Sydney Airport and Port Botany.

The site is also in close proximity to the Sydney Gateway and WestConnex motorway network, to be delivered in the short term. As outlined in the Future Transport Strategy 2056 and South East Sydney Transport Strategy (SESTS), the Sydney Gateway, Stages 1 and 3, will deliver major new motorway connections from Sydney Airport's Domestic and International terminals to the Sydney motorway network at St Peters Interchange, located west of the subject site on Gardeners Road. The SESTS also earmarks an extension of Sydney Gateway from St Peters to Port Botany.

The current and preferred future transport network scenario outlined in the SESTS factors in employment intensification in Green Square-Mascot Strategic Centre as a land use assumption.

Further, the SESTS outlines a 'Movement and Place Framework', which defines the purpose and functions of South East Sydney's road network, based on the future place-based vision for each road, route or street. This framework defines Gardeners Road, O'Riordan Street and the motorway network as having high movement and low place functions. The most important feature of these routes is connectivity between destinations, emphasising the need to keep traffic flowing safely and efficiently, more so than improving the local civic environment. However, further south of the site, the Strategy defines routes in the immediate vicinity of Mascot train station, such as Church Avenue and John Street, as having high place and local to significant movement functions.

The Future Transport Strategy 2056 and SESTS therefore support the proposed development in principle, provided that freight movements to and from the subject site optimise the current and future motorway network routes and avoid local routes in the Mascot station precinct.

Development and Planning Activity in the Vicinity of the Subject Site

Council officers wish to direct the Department's attention to recent development and planning activity in the vicinity of the subject site that should be taken into account in the Department's assessment of this EIS. This includes:

- In October 2020, Transport for NSW (TfNSW) and construction company CPB completed the construction of the WestConnex / new M5 motorway, which involved the major upgrade of Bourke Road, Gardeners Road and Bourke Street as part of this project. Although this project has now been completed, there were numerous Public Utility Services which were relocated as part of the project. Council officers understand that Ausgrid installed new cables under Gardeners Road as part of the project and that this work has not been completed. It is also understood that Ausgrid has a current project to install HV cables between Alexandria and Kingsford, which may have some implications for the subject site. It is therefore recommended that a thorough search be undertaken to locate all Public Utility Services around this site to ensure none are impacted by the proposed development.
- At 653 Gardeners Road, south west of the subject site, a Development Application (DA-2015/10022) was approved by the Land and Environment Court for a 14-storey residential development with ground floor commercial uses. Development consent for this development expires on 20 December 2023. It is noted that the EIS acknowledges this development consent. However, there may be conflicts between this development and the subject site, if both are under construction at the same time.
- TfNSW is currently upgrading Mascot train station, which is affecting traffic flows along Bourke Street. This station upgrade is due for completion in March 2023.
- The construction of the Sydney Gateway project will also affect traffic flows around the subject site. Further, the imminent completion of the M4 to the St Peters Interchange will likely bring more traffic into this locality, which is already experiencing heavy congestion. It is recommended that the Department ensures that the Construction Traffic Management Plan, required under the SEARs, addresses not only traffic into the subject site, but also traffic from the Mascot train station upgrade, M4 motorway and Sydney Gateway projects.

Other considerations

Council officers wish to express concern at the proposed signage and building illumination, and the potential for adverse impacts on the amenity of nearby current and future residents. Illumination should be curtailed in terms of hours of illumination and/or illuminated display area.

It is not clear if the Visual Impact Assessment has adequately taken into account potential impacts of the proposed development on the approved future residential development at 653 Gardeners Road. This includes potential impacts on solar access as a result of the proposed maximum building height of 22.59m on the northern part of the site, which exceeds the Height of Building control of 18m for this part of the site (and is the subject of a Clause 4.6 variation request).

It is requested that the Department ensures that potential visual impacts of the proposed development on both the current and approved future residential uses to the south-west of the site are adequately considered.

This concern also applies to the assessments of noise and other amenity impacts as a result of the proposed 24-hour operation on the site.

Council officers suggest a more landscaped corner presentation to the Gardeners Road / Bourke Road intersection, with a well landscaped public domain. This would help to improve ground-level experience of the subject site and offset the visual impact of the proposed development when viewed from the south-west, including from current and approved future residential developments. The proponent should also clearly demonstrate the achievability of any proposed landscaping along the site frontage against the requirements of the easement.

Council officers consider pedestrian cross-boundary connectivity should be adequately investigated, which would help ameliorate what is currently a very hostile pedestrian environment.

We trust that the Department will carefully consider this feedback on the exhibited EIS for this proposal. If you require further clarification, please do not hesitate to contact Nigel Riley, Senior Urban Planner on 02 9562 1781 or via email: nigel.riley@bayside.nsw.gov.au.

Yours sincerely



Clare Harley
Manager Strategic Planning