

Tallina Pty Ltd
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6 May 2022

Ms Catriona Shirley
Senior Environmental Assessment Officer
Department of Planning and Environment
12 Darcy Street,
Parramatta NSW 2124

Submission to SSD Application - SSD-32489140

Dear Catriona,

This submission has been prepared in response to the State Significant Development Application (SSD 32489140) for the Ascent Logistics Centre at 520 Gardeners Road, Alexandria (the site).

This submission has been prepared by Tallina Pty Ltd to provide commentary on the proposal and raise issues that have previously been raised by the Department of Planning and Environment (DPE) and the City of Sydney Council (Council) in relation to similar development applications within the Southern Employment Area.

Key Issues arising from SSD 32489140

Setbacks

The proposed setback along the northern frontage of the site, along the adjoining private driveway, of 4 m does not comply with the 6 m requirement as set out in Section 5.8.2.2. of the Sydney Development Control Plan (SDCP) 2012. Additionally, a minor non-compliance of the 6 m setback is provided on the upper levels on the western boundary of the site, fronting Bourke Road.

The EIS justifies this non-compliance in order to provide articulation of the built form. However, the proposed built form on the northern portion of the site comprises vehicular ramps and office spaces with little articulation. Therefore, there appears to be no justification for this non-compliance.

Furthermore, fencing is not permitted along street frontages. The proposal, however, includes a 2.1 m high fixed boundary fence proposed on the southern part of the Bourke Street frontage.

Ancillary Office Space

Under Section 5.8.2.8 of the SDCP 2012, ancillary office space to industrial (IN1 zone) development is limited to 15% of total GFA. The proposed development includes a 5% exceedance of this control.

The EIS states the ancillary office space is proposed to support the specific needs of the incoming tenants. However, it is noted that the tenant, Schindler Lifts, will occupy the premises under a 10-year lease at the site.

Further examination should be undertaken to clarify:-

- a) the long-term intention of the large office spaces once the tenant's lease expires; and
- b) whether the 5% exceedance will lead to longer term encroachment of large-scale commercial office space into the IN1 General Industrial zone.

Site Access

Bourke Road performs a significant pedestrian thoroughfare linking the southern Employment Lands to Mascot Train station in Bayside Council.

The proposal does not provide equitable accessibility for pedestrians and vehicles entering and passing the site, which is particularly sensitive in an urban setting. Section 5.8.2.6 of the SDCP 2012 prioritises pedestrian traffic by ensuring the width of driveway crossings are minimised and the width of pedestrian paths are maximised.

The large vehicle crossover on Bourke Road does not provide refuge or seek to reduce the width of the hardstand to ensure safe and equitable passage for pedestrians travelling to and from Mascot Trains Station on Bourke Road.

This issue should be carefully considered in the Department's assessment.

Vehicular Movements

The proposed driveway widths and swept paths demonstrate generous movements for large vehicles entering and exiting the site at the expense of surrounding soft landscaping. The surrounding deep soil and landscaped areas should be prioritised over vehicular movements.

Tree Canopy Coverage

The proposal identifies a 3,064 m² (16%) canopy coverage is proposed, in accordance with the SDCP 2012. The proposed tree canopy coverage appears to have been miscalculated as it relies upon canopy coverage that extends outside the defined boundary of the site. We recommend that the tree canopy coverage be recalculated.

There are also inconsistencies between the tree canopy coverage plan and the deep soil plan identified in the Landscape Design Report prepared by Urbis.

The tree canopy cover excludes the trees under the ramp on the north-eastern side of the Site. However, these trees are included within the deep soil calculations. The location of these trees, being underneath the ramp, limits their access to sunlight and rain. This issue should be further considered.

Deep Soil Area

Clarification is required to determine the total area of the deep soil zone. The proposal states the deep soil area within the site is 2,911 m² (15.3% of total site area).

The proposed deep soil zone calculations include permeable surfaces, signage structures, services and hardstand areas such as the pedestrian paths and vehicular entries.

Landscaping

The retention of existing trees is supported as currently contemplated in the proposal.

The driveway crossovers should not encroach the Tree Protection Zones (TPZ) of these trees greater than 10% as outlined within the City of Sydney Landscape Code 2016 Volume 2.

If there is a TPZ encroachment greater than 10%, it should be demonstrated by an AQF Level 5 Arborist that the street tree/s will remain viable into the future.

Car Parking

We note that the proposed car parking rates do not comply with Clause 7.8 of the Sydney Local Environmental Plan (SLEP) 2012, exceeding the maximum number of spaces by 4. In addition to this non-compliance, another 47 car/van parking spaces are proposed for the use of the primary tenant, Schindler Lifts.

Further examination should be undertaken to clarify the long-term intention of the roof top car parking area and the future use of the excess car storage spaces and to ensure traffic impacts are managed to acceptable levels, particularly should Schindler Lifts one day vacate the building.

The car parking arrangement on the rooftop does not provide one (1) tree per five (5) car spaces as outlined in the City of Sydney Landscape Code 2016 Volume 2. This non-compliance exacerbates the 'heat island' effect of the proposed development.

Sustainability

The proposed roof top car parking is constructed of concrete with little shading or vegetation over the concrete area, without proposed measures to minimise heat gain and mitigate urban heat island effects. This aspect should be further examined in the Department's assessment.

The rooftop has also omitted a significant opportunity to provide solar PV to supply on-site generation, particularly considering the large office content. Solar PV should be considered noting its inclusion is critical to ensuring sustainable development outcomes and ongoing mitigation on reliance of grid-fed power supply.

Architectural Design

The proposed design response is not consistent with the framework of design excellence in the SLEP 2012, nor does it represent the highest standard of architecture for this emerging typology in this prominent and exposed location.


Many materials and finishes have been decoratively applied to the building in an attempt to break down the mass, resulting in a non-cohesive design.

More consideration to the public domain, streetscape and surrounding context would benefit the future of industrial development within the city fringe.

Conclusion

On the basis of the above analysis, it is requested that the Department take into consideration the above comments in its assessment of the SSD application (SSD 32489140) and supporting Clause 4.6 Variation Request

Yours sincerely

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Samantha Evans
Attorney for Tallina Pty Ltd