

TO	Kevin Kim
OF	LIVERPOOL CITY COUNCIL
FROM	Bureau SRH
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Dear Kevin,

I refer to Sydney Western City Planning Panel's (SWCPP) recent Record of Briefing for a briefing held on 13.07.20. over development application for 28 Yarrunga St, Prestons – DA-904/2019. Below is our response to the points raised in SWCPP's Record of Briefing issued electronically to the Client and yourself on 16th July 2020.

- The reduced front setback for the ground floor level of the proposed stage 1 building, as well as variation to the minimum landscaped area and deep soil area of 10%. The Panel indicated that these departures would need adequate design justification in relation to impacts on the surrounding streetscape. The Panel noted that the site generally in unencumbered, such that achieving the standard would not normally seem overly onerous.***

Liverpool City Council Development Control Plan 2008 Part 7 – Setbacks sets out the following objectives:

- To ensure buildings do not adversely dominate the streetscape environment of industrial areas.*

The below responses demonstrate how the proposal complies with the DCP objectives:

- The non-compliance of the ground floor setback results in a superior architectural and landscaped presentation to Yarrunga St as the 10m setback provision at ground floor is intended to facilitate on-grade parking. The proposal accommodates all required parking within a basement and therefore leaves the entire front setback zone to be landscaped uninterrupted, including the sophisticated integration of advanced and significant planting, raingardens and bio-swales contributing to a highly considered water sensitive design.
- The additional 2.5m setback at ground floor intended in the DCP to facilitate at-grade parking also includes use of hardstand as loading bays generally with an operational height of 4.5m. The undercroft design at the front of industrial proposals becomes redundant in the subject proposal as all loading and warehouse access is located centrally within the development. The proposed traffic and circulation strategies eliminate the need for any hardstand area to be located forward of the building line therefore affording maximum landscaped and deep soil coverage along the site frontage.
- The building line forward of the 10m control at ground floor has been architecturally designed to facilitate street activation through a highly considered façade design. The façade of the ground floor is 50% transparent and recessive in nature to solid cladding above. The proposed glazing creates a sense of depth and removes the presence of a solid street wall. In comparison to adjacent warehouse development with monolithic street facades, the proposed breach of front

setback at the ground floor does not adversely dominate the streetscape of Yarrunga St. Rather it introduces a contemporary architectural response to a prime-grade industrial development.

Below is a visual analysis of the proposed development and adjacent development setbacks demonstrating how the subject proposal's design response to setbacks results in a superior streetscape environment through transparency and visual interest.

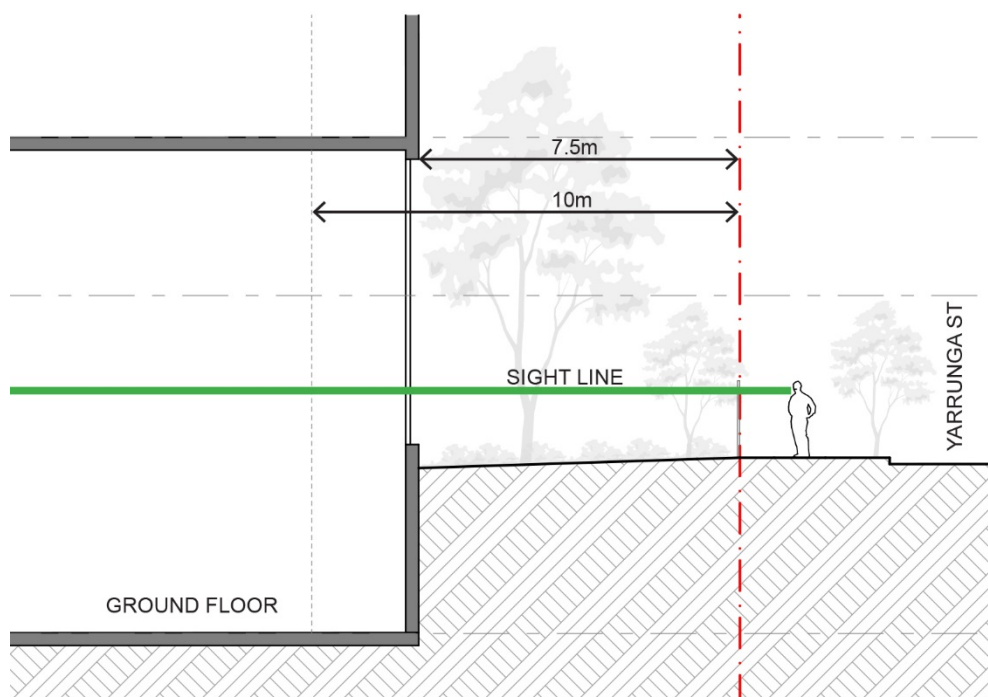


Figure 1 – 28 Yarrunga St façade and sectional street front analysis.

Figure 1 above demonstrates a premium presentation to Yarrunga St through transparent façade detailing that offers a greater depth of field than would otherwise be provided by the 10m requirement. Not only does the alternating glazed to solid façade ratio create a visually distinctive street presence, it also contributes to a heightened sense of internal amenity with direct connectivity to the street.

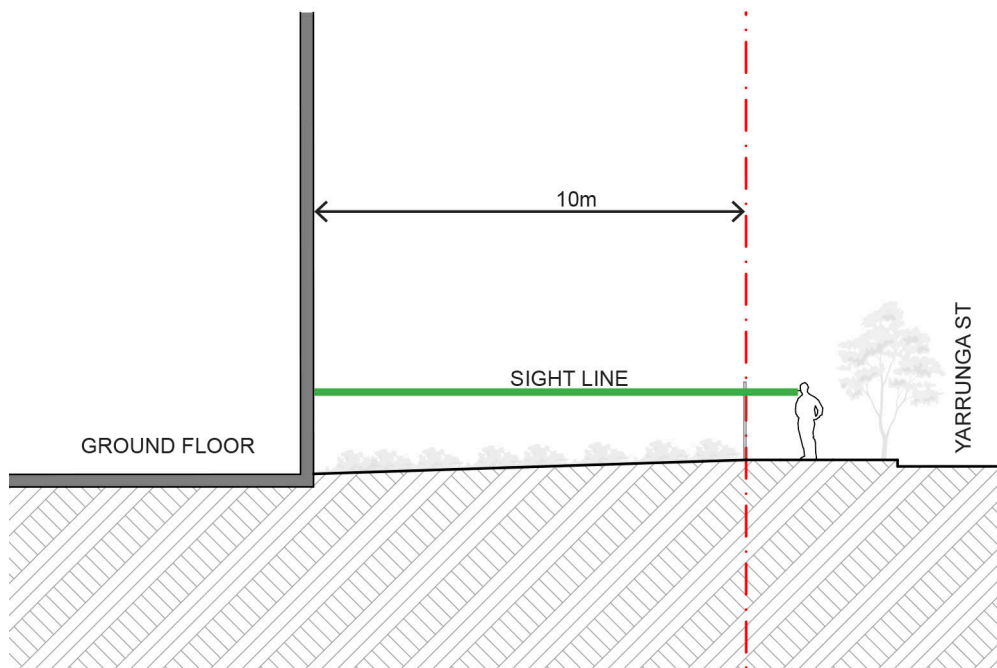


Figure 2 – 20 Yarrunga St façade and sectional diagram

Figure 2 above demonstrates lesser street scape and visual amenity to Yarrunga St despite having a 10m setback. Sight lines terminate at the building line with no significant tree planting to soften the sheer wall clad solely in solid metal sheeting. Similar street front conditions as are found directly opposite the subject site at 5-35 Yarrunga St.

- d) The proposed development at 28 Yarrunga St carefully considers the natural topography of the existing site to avoid large expanses of solid street wall. The proposed ground floor level is achieved through balance cut and fill rather than relying on a retaining wall in excess of 4m to the street frontage. In contrast to this approach, the warehouse directly opposite the subject site relies on a solid retaining wall that reaches a maximum height of 6.4m above existing ground level on Yarrunga St and creates a walled barrier between the building line and street interface. A comparison of street front conditions is shown below:



Figure 3 & 4 – 5-35 Yarrunga St – solid reinforced elevated retaining wall on boundary.

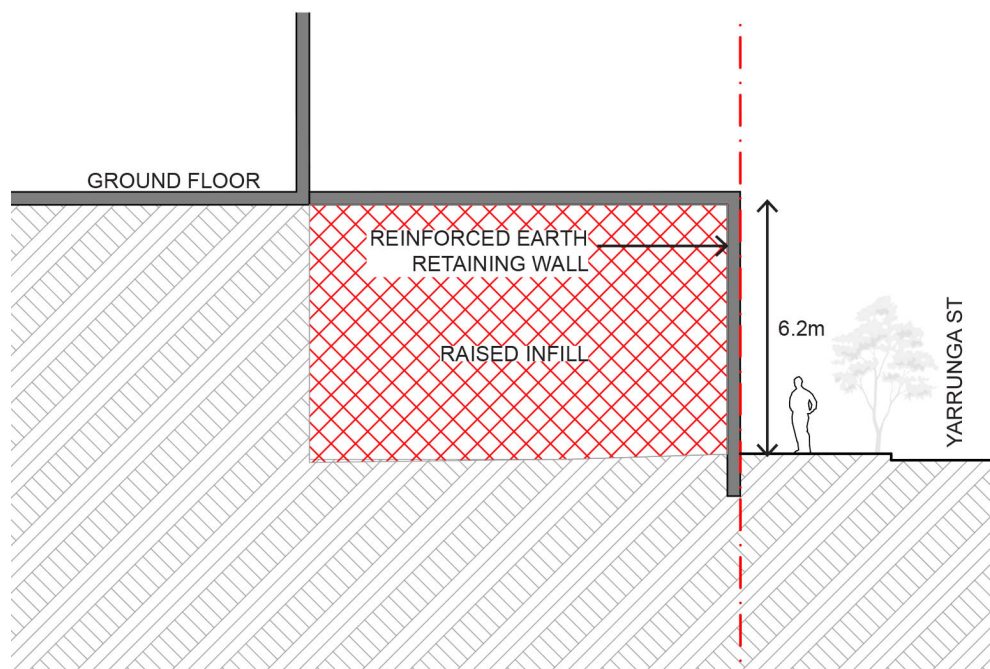


Figure 5 – 5-35 Yarrunga St sectional diagram showing relationship to existing street level.

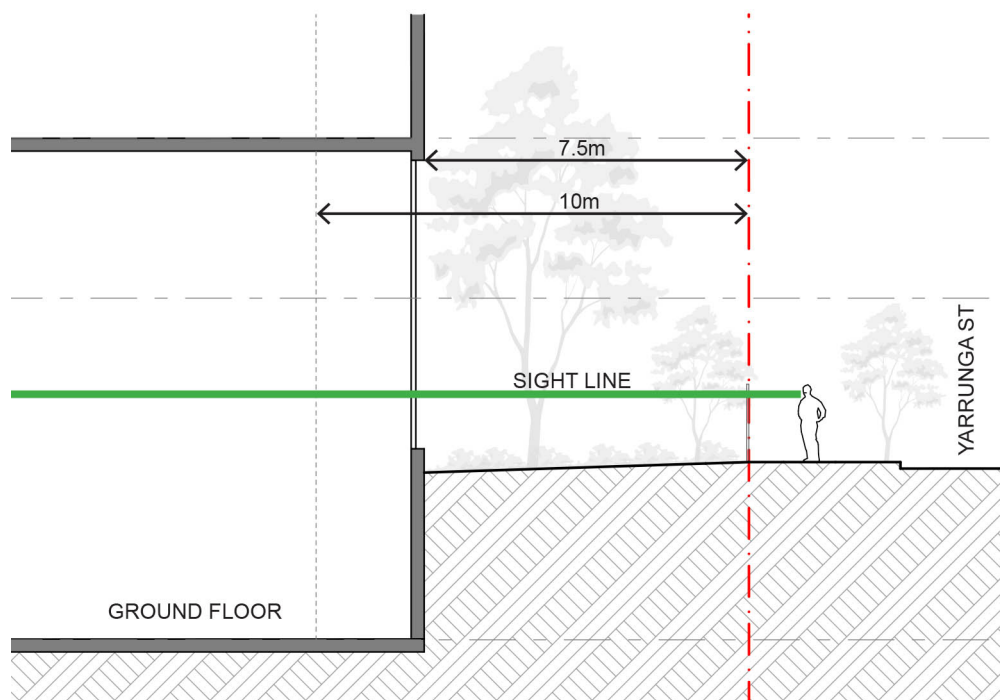


Figure 6 – 28 Yarrunga St sectional diagram showing relationship to existing street level.

The above diagrams demonstrate that a far superior street front condition is created by the subject proposal by responding to natural site conditions. This allows for natural on-grade landscaping with the ability to drain stormwater via raingardens and bio-swales.

- e) An analysis of site wide deep soil on similar industrial development demonstrates that the deep soil for the subject proposal is aligned, if not better, than other approvals within the precinct. Refer to below analysis:

SUMMARY OF LANDSCAPE AREAS - SIMILAR DEVELOPMENTS					
	28 YARRUNGA ST, PRESTONS	20 YARRUNGA ST, PRESTONS	55 YARRUNGA ST, PRESTONS	LOT 11 & 88 KURRAJONG RD PRESTONS DA-593/2019 (Recommended for approval)	38 BERNERA RD, PRESTONS
Site Area (m ²)	46,838	20,318	58,587	59,307 (industrially zoned)	48,136
Landscape control (% site area)	10	10	10	10	10
Required landscape	4,684	2,032	5,859	5,931	4,914
Proposed landscape	3,560	1,112	3,405	4,522	2,463
% Site area	7.6%	5.5%	5.8%	7.6%	5.0%

Significant tree planting is proposed at both building entry points creating a buffer between pedestrian and vehicle entry points. Further significant tree planting is proposed along the entire length of the building frontage in addition to the required street tree planting requirements of Liverpool City Council.

Landscaped zones throughout the development site are enriched by a series of planting areas that include a mix of significant trees and native plant and shrub groupings. The proposal has been sited in keeping with the prevailing street, side and rear setbacks, leaving a generous, leafy front garden as is common in the area.

The significant landscaping schedule also allows for efficient water management throughout the site and is addressed through efficient planting and hydraulic schemes. Heavily planted deep soil zones allow for water filtering and natural absorption. The inclusion of native landscaping ensures low watering requirements.

The overall landscaping scheme adds value to the quality of the development and carefully considers conditions between adjoining properties. A strong relationship between architectural design language and landscaping along the street frontage contributes to a highly desirable connection between public and private domain.

- f) Reducing the ground floor front setback to 10m would adversely impact the feasibility of the proposed development. The minor variation is highly encouraged to be considered valid in light of economic and logistical benefits it will provide both locally within Liverpool LGA and beyond. The proposal complies with all Liverpool LEP 2008 controls, provides significant construction investment and job creation and has no community objections.

In light of the above responses, the proposal is an appropriate response to the streetscape frontages in industrial areas and meets the objectives set-out in Liverpool City DCP 2008 Part 7 – Setbacks. The issues raised by the SWCPP should therefore be considered justified.

2. ***Demolition of the existing warehouse and the need to specifically consider and address potential contamination issues.***

Liverpool City Council Development Control Plan 2008 Part 7 – Amenity and Environmental Impact sets out the following controls:

- *Contamination: Any DA for land identified as potentially contaminated by prior land use activities...must be supported by a phase 1 contamination report.*

The below response demonstrates how the proposal complies with the DCP contamination control:

- a) The following site investigations and reports were commissioned by Martens and Associates Pty. Ltd. and submitted as part of DA documentation:
 - Preliminary Site Investigation
 - Detailed Site Investigation
 - Remedial Action Plan.

Attention is drawn to Section 4 of the Remedial Action Plan ref. P1907209JR04V01 and dated December 2019. Martens and Associates identify the warehouse at the central north portion of the site (understood as the existing warehouse in the SDWCPP Record of Briefing) as Data Gap Area C. Due to the nature of the existing structure being slab on ground, the remedial action plan requires additional investigation and testing to be completed after demolition of the existing warehouse. Martens and Associates detail the proposed methodology for data gap closure and is noted verbatim below (pp. 13-14 Remedial Action Plan):

4.2 Data Gap Closure

Following demolition of structures and removal of hardstands and UPSS infrastructure, the following works are required to address data gaps as noted above:

- 1. Visual inspection of data gap areas for evidence of contamination (i.e. soil staining, odours and / or fibrous cement sheeting).*
- 2. Investigate depth of fill with selected sampling of fill material. Where natural soils are encountered, samples are to be collected. For Data Gap Areas A, B and C, investigate and sampling to be completed at rate of 1 per 100 m².*
- 3. Samples from Data Gap Area A are to be laboratory analysed for heavy metals, OCP / OPP and asbestos.*
- 4. Samples from Data Gap Area B and C are to be laboratory analysed for heavy metals, TRH, BTEXN, PAH, OCP / OPP and asbestos.*
- 5. Samples to be collected for UPSS infrastructure remediation excavation*
- 6. Samples from Data Gap Area D are to be collected of excavation floor at 1 per 10 linear metre of excavation face (minimum one per face) and laboratory analysed for TRH and PAH.*
- 7. Preparation of a supplementary DSI for Stage 1 and 2 works, to address data gap investigation results and provide assessment of laboratory results against the SAC to determine if additional contamination is present.*
- 8. Preparation of an addendum to this RAP if any contamination requiring remediation and / or management is identified. If any PACM is identified by the environmental consultant during visual inspection, collected samples are to also be tested for asbestos in soil as per the WA Dept. Health (2009) Guidelines for the Assessment, Remediation and Management of Asbestos Contaminated Sites in WA.*

As testing and reporting extends beyond the required preliminary site investigation stipulated in the DCP, the procedures for site remediation are highly reasonable at this stage of development. We understand that the RAP identifies data gaps that require further investigation and assessment when construction allows and that

this testing should form standard conditions of consent. The issues raised by the SWCPP should therefore be considered justified.

We trust this information satisfies SWCPP's key issues discussed and recorded at the briefing held on 13.07.20. over development application for 28 Yarrunga St, Prestons – DA-904/2019. If you require further information or clarification, please don't hesitate to contact me.

Regards,

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