



## SUBMISSIONS REGISTER

Group	Name	Section where issues addressed in submissions report
<b>Public Agencies</b>	Willoughby City Council	<b>Appendix A</b>
	Ausgrid	<b>Appendix A</b>
	Transport for New South Wales	<b>Appendix A</b>
	Heritage NSW - Aboriginal Cultural Heritage	<b>Appendix A</b>
	Sydney Trains	<b>Appendix A</b>
	Sydney Metro	<b>Appendix A</b>
	DCCEEW Water	<b>Appendix A</b>
	Sydney Water	<b>Appendix A</b>
<b>Stakeholder groups</b>	Tal Holdings Ltd & the Federal Group	<b>Appendix A</b>
<b>Individuals</b>	Andrew Nelson	<b>Appendix A</b>
	Nick Pearson	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>
	Anonymous	<b>Appendix A</b>

In addition to the above, the Submissions Report provides a response to the issues raised in DPHI's Key Issues Letter, dated 27 May 2025.



## CHATSWOOD GRAND RESIDENCES – RESPONSE TO SUBMISSIONS MATRIX

A detailed response to matters raised in the Agency and public submissions is in the table below.

Request for Additional Information	Response	Appendix
<b>Department of Planning, Housing and Infrastructure</b>		
<b>1. Gross floor area (GFA) and floor space ratio (FSR)</b>		
<p>Attenuation measures, including fixed louvres and planter boxes, are proposed on the openings of the breezeways to reduce wind impacts. The floor-to-ceiling fixed louvres may potentially enclose the breezeways at one end and plantings may potentially fail.</p> <p>In the event that the breezeways need to be enclosed in order to protect residential amenity, these areas must be included in the GFA calculations.</p>	<p>The proposal has been amended to fully enclose the horizontal corridors on Ground Level, Levels 01, 03, 04, and all levels beyond Level 05. This amendment removes potential adverse wind impacts and improves amenity for residents. The enclosed corridors are identified in the amended architectural drawings (<b>RTS Appendix D</b>).</p> <p>The SSDA originally proposed breezeway corridors that were thoughtfully designed to allow natural light and airflow to create a bright and inviting environment, fostering a sense of openness and connection for residents. The intent of the breezeways was to enhance the living experience of residents and incorporate sustainable design principles by providing ventilation to the mechanical plant rooms and air-conditioning condenser units.</p> <p>The amendment to fully enclose the horizontal corridors provides consistency between the SSDA and the amendments made to the Regional DA (DA-2024/47) during the Section 34 conciliation process. The amendments made to the Regional DA (which Council publicly exhibited between 6 May– 20 May 2025) reflect negotiations between the applicant and Council and resolution to contentions. The enclosed breezeways on Ground Level, Level 01, Level 03, Level 04, and residential upper levels (Levels 05 – 35) are included in the GFA calculations. The inclusion of breezeways in the GFA adds an additional 2,486.9 sqm GFA. A revised Clause 4.6 variation request (FSR) is provided at <b>RTS Appendix E</b>.</p>	<p><b>RTS Appendix D</b> <b>RTS Appendix E</b></p>
<p>In addition to the breezeways/corridors, update the GFA Plans and associated calculations to:</p> <ul style="list-style-type: none"> <li>add the circulation spaces associated with the waste room at Levels 3-35 in Building A</li> <li>add the stairwell to private rooftop terraces for apartments A3403, A3404 and B3501</li> <li>apportion the GFA between affordable and market GFA for the corridor leading to apartments B504-B1004 and B505-B1005.</li> </ul>	<p>The GFA calculations within the architectural plans have been updated to:</p> <ul style="list-style-type: none"> <li>Include the circulation spaces associated with the waste room at Levels 3-35 in Building A (91 sqm)</li> <li>Include the stairwell to private rooftop terraces for apartments A3403, A3404 and B3501 (20 sqm)</li> <li>Apportion the GFA between the affordable housing and market housing GFA for the corridor leading to apartments B504-B1004 and B505-B1005 (11.4 sqm)</li> </ul> <p>A revised Clause 4.6 Variation Request (FSR) is submitted with this amended SSD package (<b>RTS Appendix E</b>) to support the revised variation to the GFA / FSR.</p>	<p><b>RTS Appendix D</b> <b>RTS Appendix E</b></p>

Request for Additional Information	Response	Appendix
<p>Provide an update clause 4.6 variation request which quantifies the extent of variation, based on the updated GFA calculations, and demonstrates that compliance with the FSR development standard is unreasonable or unnecessary and sufficient environmental planning grounds are provided to contravene the development standard.</p>	<p>The exceedance to the applicable FSR development standard under the Housing SEPP is assessed in the amended Clause 4.6 Variation Request (FSR) (<b>RTS Appendix E</b>).</p> <p>The amended Clause 4.6 Variation Request demonstrates that there is an absence of environmental harm arising from the exceedance the FSR development standard and sufficient and positive environmental planning grounds to justify contravention.</p>	<p><b>RTS Appendix E</b></p>
<p><b>2. Communal open space (COS)</b></p>		
<p>COS areas provided on Levels 1, 3 and 4 are fragmented, small and isolated from residential apartments. Discuss the functionality of these spaces, how residents will be encouraged to use the spaces and how impacts to the commercial tenancies will be managed.</p>	<p>The amended proposal provides clarification regarding the allocation and calculation of communal open space. The spaces located on Levels 01 and 03 are incidental in nature and are expected to be used primarily by occupants of the commercial tenancies during business hours. The commercial communal open spaces at these Levels will encourage collaboration and networking and provide a welcoming environment for employees to relax and recharge. Residents of the live/work dwellings are also able to access and use these areas at Levels 01 and 03.</p> <p>In the original SSDA, communal open spaces at Levels 01 and 03 were included in the overall communal open space calculations. These areas have now been excluded, as they are not exclusively available for residential use and therefore do not meet the criteria for inclusion in the calculation.</p> <p>The primary communal open space and associated amenities for residents are provided at Level 02, with additional communal open space, exclusive to residents, located at Level 04.</p> <p>The amended proposal clarifies the area of the communal open space being 1,067 sqm. This represents 24.8% of the total site area (4,294 sqm).</p>	<p><b>RTS Appendix D</b></p>
<p><b>3. Noise</b></p>		
<p>Provide an updated Noise and Vibration Impact Assessment (NVIA) which:          identifies the date and time of the noise monitoring, and justifies that the noise levels recorded can be relied upon for the noise assessment          considers typical noise generation from mechanical plant needed for the proposal and future commercial/retail uses and the future childcare centre to internal and external receivers. Identify whether mitigation measures are required          considers noise generation impacts from the outdoor communal open spaces and rooftop private open space to both internal and external receivers</p>	<p>a) The date and time of noise monitoring are identified in Section 5.2 (long term noise monitoring) and Section 5.2 (short term noise monitoring) of the Noise and Vibration Impact Assessment (<b>NVIA</b>). Based on site observations:</p> <ul style="list-style-type: none"> <li>▪ External road and rail noise sources were the dominant noise sources at LT2 and LT1 respectively. No corrections were deemed necessary in establishing a Day/Night noise level.</li> <li>▪ Background noise levels at these locations were representative of the acoustic environment at the nearest noise sensitive receivers, without extraneous noise events.</li> </ul> <p>b) The NVIA has been updated to provide further discussion around mechanical plant and equipment (Section 7.1 of NVIA). It should be noted that at this stage of the design, mechanical plant and equipment selections are yet to be made. E-LAB have</p>	<p><b>RTS Appendix P</b>  <b>RTS Appendix Q</b>  <b>RTS Appendix D</b></p>

Request for Additional Information	Response	Appendix
<p>considers traffic and rail noise and vibration intrusion to the future childcare centre. Identify whether mitigation measures are required.</p>	<p>reviewed preliminary mechanical services layouts provided by JHA for the development, and note the following:</p> <ul style="list-style-type: none"> <li>▪ No large-scale equipment such as cooling towers, chillers or heat pumps are proposed.</li> <li>▪ External mechanical plant will be limited to condensers, common ventilation fans, apartment ventilation fans (toilet exhaust, outside air fans), and hydraulic pumps.</li> <li>▪ The loudest equipment proposed for the development will be located within the basement, with sufficient space to provide acoustic mitigation measures such as attenuators/silencers, lined ductwork and acoustic louvres. Other high-sound power level fans such as those used for stair pressurisation will only operate during fire mode and will not be subject to typical noise emission targets.</li> <li>▪ Smaller common ventilation fans/apartment fans will be easily treated with internally lined ducting to ensure project noise emission targets are achieved.</li> </ul> <p>During the design development stage of the project, a detailed review of mechanical plant and equipment shall be undertaken. Acoustic mitigation measures will be determined to ensure compliance with the external noise emissions criteria established in Section 6.4.1 of the NVIA.</p> <p>c) The NVIA includes an assessment of outdoor communal open spaces and rooftop private open spaces (Section 7.9 of the NVIA). The assessment found that:</p> <ul style="list-style-type: none"> <li>▪ In regard to the communal open space at Level 2, the “Intrusiveness” noise criterion from the NPfl, will be achieved at the nearest external noise sensitive receivers.</li> <li>▪ Live/work spaces on Level 3 and 4, and residential apartments above will be significantly shielded from the majority of noise from the outdoor communal space due to the building overhang over the pool/spa, gym and barbeque areas.</li> <li>▪ To minimise noise emissions from the use of the outdoor communal open space, mitigation measures are proposed as outlined in Section 9.5 of the NVIA.</li> <li>▪ It is not uncommon for residential balconies to be in view, or audible from neighbouring apartments within the same development. Noise to receivers within the development (such as other apartments) shall be controlled by building management to ensure the acoustic amenity of all residents within the development.</li> <li>▪ External receivers outside the development will not have direct line of sight to private residential spaces on Level 35 and Roof Level, therefore no adverse noise impacts are expected.</li> </ul> <p>d) A Childcare Noise and Vibration Impact Assessment has been prepared (<b>RTS Appendix Q</b>) to assess traffic and rail noise and vibration intrusion to the future childcare centre. Acoustic mitigation measures are provided in Section 5 of the Childcare NVIA to ensure compliance with the relevant guidelines. The measures have been incorporated into the revised Architectural Plans at Appendix D.</p>	

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<b>4. Loading bay</b>		
<p>Demonstrate the functionality of the loading bay noting the width of the bay and structural elements along its sides leave little space for loading/unloading of goods and manoeuvring waste bins from the rear of the vehicle.</p>	<p>Updated swept paths have been prepared to demonstrate the loading dock can accommodate a 10.5m Council waste collection vehicle and a 6.4m Small Rigid vehicle (<b>SRV</b>) parked at any one time. The loading area has a height clearance of 4.5m in accordance with requirements of AS2890.1 and can accommodate Council's waste collection vehicle of 10.5m in length.</p>	<b>RTS Appendix M</b>
<b>5. Childcare centre</b>		
<p>The internal fit out and operational details of the childcare centre do not form part of the proposal. Notwithstanding, provide an updated Child Care Planning Guideline assessment which demonstrates that the child care centre use, size and location on the site is appropriate and is capable of complying with: the design quality principles of the guideline the objectives related to the location of the centre in the building (for example, solar access, acoustic privacy, noise and air pollution), the cold shell design of the centre (for example ventilation and natural light) and the size of the centre (for example, indoor and outdoor space).</p>	<p>This amended proposal is supported by an updated assessment of the childcare centre against the Child Care Planning Guideline (DPHI, 1 October 2021) (<b>the Guideline</b>). The assessment demonstrates that the proposal is consistent and capable of compliance with relevant design quality principles and objectives relating to the location and size of the childcare centre within the building and the cold shell design.</p>	<b>RTS Appendix K</b>
<b>6. Design</b>		
<p>Provide a copy of the vertical circulation report, referenced in the Urban Design Report in relation to Objective 4F of the Apartment Design Guidelines (ADG), which demonstrates that an acceptable number of lifts is provided for the number of apartments proposed.</p>	<p>The Vertical Circulation Report is submitted with this revised SSD package and demonstrates that an acceptable number of lifts is provided for the number of apartments proposed.</p>	<b>RTS Appendix R</b>
<p>Clarify whether floor-to-floor heights of 3.15m are sufficient to satisfy requirements of the Design and Building Practitioners Act 2020 related to required insulation and water proofing.</p>	<p>Further to ongoing consultation with DPHI, the applicant has elected to amend the floor-to-floor heights in order to achieve compliance the Design and Building Practitioners Act 2020 in relation to requirements for insulation and water proofing. The floor-to-floor height have been updated in the architectural plans as follows:</p> <ul style="list-style-type: none"> <li>▪ Level 1 - 2: +70mm</li> <li>▪ Level 2 - 3: +220mm</li> <li>▪ Level 3 - 4: +220mm</li> <li>▪ Level 4 - 5: +270mm</li> <li>▪ Level 33 - 34: +270mm</li> <li>▪ Level 34 - 35: +270mm</li> <li>▪ Level 35 - roof: +270mm</li> </ul>	<b>RTS Appendix D</b> <b>RTS Appendix F</b>

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	<ul style="list-style-type: none"> <li>▪ Total adjustment to the floor-to-floor height: 1590mm</li> </ul> <p>The revised floor to floor heights (in addition to a minor reduction to the extent of rooftop services enclosure) result in an additional 1530mm to the building height. A revised Clause 4.6 variation Request (Height) is provided at <b>RTS Appendix F</b>.</p>	
<p>Clarify the purpose of the sink/benchttop space outside of the ensuite bathrooms to the main bedrooms of apartments B505-1005 and B501-B1001. Should these apartments be dual-key apartments, they should be appropriately labelled and consideration of amenity requirements provided.</p>	<p>Apartments B505-1005 and B501-B1001 are not intended to be dual key apartments. Historically, Billbergia have found that buyers seek apartment layouts that provide the space and flexibility to accommodate grandparents or extended family. The intergenerational apartments provide a separate wing for grandparents or extended family to co-exist with the primary apartment zone. The sink/benchttop space to the main bedroom of the 'intergenerational' apartments provides a basic 'wet bar'. The intergenerational apartments exist on a single title, as opposed to traditional dual-key apartments. This design is suitable for young families who may be living with grandparents but want a degree of separation.</p>	<p><b>RTS Appendix D</b></p>
<p>Discuss the purpose of the lift plant room on Basement Level 7 (Drawing number DA100) and why it cannot be located on another basement level.</p>	<p>The lift pits are greater than 2.5m deep and require a pit access door at floor level to service components. This is in accordance with the relevant code requirement [EN 81-20 Cl5.2.2.4a]. The lift motor and controllers are located at the top of the lift well.</p>	<p><b>N/A</b></p>
<p>Provide an updated deep soil calculation noting the minimum 6m dimensional requirements of Objective 3E of the ADG.</p>	<p>The updated Landscape Plans and Architectural Plans identify deep soil zones as:</p> <ul style="list-style-type: none"> <li>▪ Including the SP2 zoned land: 504.5 sqm (10.6% of the site area)</li> <li>▪ Excluding the SP2 zoned land: 303.5 sqm (7.1% of the site area)</li> </ul> <p>The deep soil dimensions are identified on drawing DA550 of the Architectural Plans. The deep soil areas vary in size (from 2.5m to 6.5m in width along with planter lengths that exceeds 10-12m in each pod along Pacific Highway) and have been designed in response to the shape of the site and through site link arrangements. Deep soil zones are primarily situated along the Pacific Highway frontage and at the rear of the site.</p> <p>A planting buffer zone is proposed along the Pacific Highway frontage, connecting to the pocket park on the corner of Pacific Highway and O'Brien St. This area comprises low lying native planting to contribute to the active street frontage. Abundant tree canopies have been designed within the front deep soil zones for the intent to provide a landscaped foreground without detracting further to the visual appearance of the towers behind.</p> <p>The deep soil areas at the rear of the site do not meet the minimum 6m dimensional requirements. This is due to the rear through site link comprising a series of accessible ramps and raised terrace planters to accommodate change in existing levels and built in seating elements. Importantly, the shape and width of the deep soil planters at the rear of the site have been designed to ensure compliance with the terms of the Sydney Trains easement for access, which requires a 3m wide</p>	<p><b>RTS Appendix J</b>  <b>RTS Appendix D</b>  <b>RTS Appendix MM</b></p>

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	<p>unimpeded access corridor at the rear of the site. The planting selection at this location will be predominantly shade tolerant given the solar aspect (refer to the amended Urban Design Report at <b>RTS Appendix MM</b> for further detail on deep soil).</p> <p>Landscaping is incorporated throughout the Ground Plane to compensate for any narrower deep soil areas. The proposed landscaping strategy will provide high-quality green spaces which seek to maximise greenery.</p>	
<p>Consider redesigning the internal layout of apartments B501-B1001 to reduce the amount of corridor space leading to the main bedroom.</p>	<p>A number of apartment layouts were previously tested, however the key constraint relates to the location of the waste chutes which push the apartment entry point to the north. This results in the long corridor leading to the 'intergenerational' bedroom, however the corridor space is utilised for the wet bar and wardrobe/storage.</p>	<p><b>RTS Appendix D</b></p>
<p><b>7. Trees and landscaping</b></p>		
<p>Provide an updated Landscape Plan with ground floor landscaping east of the SP2 zoned land along the site fronting Pacific Highway.</p>	<p>The Landscape Plans have been updated to include additional landscaping east of the SP2 zoned land along the site fronting Pacific Highway. This landscaping comprises a low raised planter along the edge of the retail showroom.</p>	<p><b>RTS Appendix J</b></p>
<p>Provide advice from the wind consultant confirming that the added landscaping along Pacific Highway will mitigate local wind impacts as recommended in Section 7.1 of the Environmental Wind Tunnel Study, should the land zoned SP2 be used for road widening purposes.</p>	<p>SLR have provided additional advice in relation to wind impacts at Pacific Highway. Wind Impacts at 6 locations were tested along Pacific Highway should the SP2 zoned land be acquired and the trees and landscaping contained in the SP2 zoned land be removed. Based on the wind tunnel data, certain locations are expected to experience exposure to westerly winds that exceed acceptable criteria.</p> <p>The Assessment indicates:</p> <ul style="list-style-type: none"> <li>▪ 2 locations along Pacific Highway are expected to satisfy the walking comfort criterion.</li> <li>▪ 3 locations along Pacific Highway are anticipated to meet the standing comfort criterion.</li> <li>▪ 1 location is not suitable for outdoor seating if the trees are removed, as wind conditions would likely exceed acceptable thresholds for sitting comfort. Introducing vertical windbreaks, such as colonnades or planter boxes, could improve seating if proposed within this area. Seating is unlikely if the road is widened and therefore the location would satisfy the walking comfort criteria without additional mitigation measures.</li> </ul> <p>The introduction of additional planter boxes near the entry to the internal through site link (west – east) is recommended as an effective alternative to provide localised wind protection.</p>	<p><b>RTS Appendix Y</b></p>
<p>The Arborist Report discusses impacts from paving and stormwater infrastructure to retained trees, however a number of these trees are close to the basement boundaries. Clarify that basement excavation and the basement structure will not</p>	<p>The original SSD application (as lodged) sought to retain 25 trees and remove and replenish 43 trees. However, some of the trees identified for removal in the SSD overlapped with those already approved for removal under the separate</p>	<p><b>RTS Appendix H</b> <b>RTS Appendix J</b></p>

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<p>detrimentally impact on the structural root zones and tree protection zones of the retained trees.</p>	<p>Demolition DA (DA-2024/19) (approved in December 2024). The updated Arborist Report and amended SSDA now propose to remove 7 trees within the site to facilitate the proposed development.</p> <p>Additionally, five streets previously proposed for removal in the original application will now be retained. The proposal seeks to retain 12 trees within and outside the site boundaries. All retained trees will require tree protection measures and sensitive construction measures as detailed in the updated Arborist Report. Sensitive construction methods will be supervised by the Arborist and will include –</p> <ul style="list-style-type: none"> <li>▪ <b>Non-destructive digging:</b> use only low impact excavation techniques within or near the TPZ.</li> <li>▪ <b>Basement excavation:</b> piling rigs will be positioned away from the TPZ to prevent any damage and root disturbance.</li> <li>▪ <b>Hydro-vacuum excavation:</b> prior to the commencement of works, the vacuum excavation worker must be inducted, with specific attention given to procedures for working within the TPZ. During excavation, water pressure must remain below 300 kPa, and no direct water stream is permitted to come into contact with tree roots to avoid physical damage.</li> <li>▪ <b>Demolition within TPZ:</b> prior to relocating any tree protection fencing, temporary ground protection must be installed to safeguard the TPZ.</li> <li>▪ <b>Permeable Paving:</b> excavate to a depth of 100mm carefully to avoid disturbing the TPZ.</li> <li>▪ <b>Kerb, gutter and footpath:</b> footpaths within TPZ are to remain in place until after construction is complete.</li> <li>▪ <b>Temporary driveway:</b> keep construction access away from the TPZ. Lay a 100mm mulch layer over TPZ's and use a grated steel pathway for vehicular access to shield roots.</li> <li>▪ <b>Relocating fences during works within TPZ zones:</b> protect TPZs with temporary ground protection prior to relocating fences.</li> <li>▪ <b>Basement excavation:</b> piling rigs will be positioned away from the TPZ to prevent any damage and root disturbance.</li> </ul>	
<hr/> <p><b>8. Construction</b></p> <hr/>		
<p>Provide an updated Preliminary Construction Pedestrian Traffic Management Plan which identifies standard construction hours for work on Saturday identifies vehicle site access during construction and provides swept paths for largest construction vehicle entering, manoeuvring and exiting the site.</p>	<p>The Preliminary Construction Pedestrian Traffic Management Plan is updated to: Identify standard construction hours for work on Saturday being 7am-12pm. Provide swept paths for the largest construction vehicle entering, manoeuvring and exiting the site (19m Single Articulated Vehicles (AVs) and 19m Truck and Dog Trailers). Vehicles will enter via Pacific Highway to the north and exit via O'Brien / Railway Street to the southern.</p>	<p><b>RTS Appendix L</b></p>

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Refer <b>RTS Appendix L</b> for further detail.		
<b>9. Other information</b>		
<p>Provide an overshadowing plan which identifies where shadows cast by the proposal overlap with existing shadowing by surrounding development. Additional shadows cast by the proposal should be identified in a separate colour.</p>	<p>The updated Architectural Plans include an updated overshadowing diagram demonstrating the overshadowing created by the proposal vs existing overshadowing by surrounding development (at the winter solstice).</p> <p>The shadow diagrams demonstrate the shadow cast by the portion of the building that is above the height plane is minimal. The shadow cast by the proposal is experienced to the south west across Pacific Highway in the morning periods, moving from west to east throughout the day.</p> <p>The greatest shadow impact from the proposal is at 9am however this is limited to Pacific Highway, the car dealerships at the corner of Pacific Highway and Fullers Road and the frontage of residential dwellings along Pacific Highway. The shadow cast to these dwellings fade away from 10am.</p> <p>Other shadow impacts deriving from the proposal include:</p> <ul style="list-style-type: none"> <li>▪ A portion of 845 Pacific Highway shadowed at 10m</li> <li>▪ A portion of 11 railway Street shadowed at 11am – 2pm (albeit minor at 2pm).</li> <li>▪ Impact to the east across the railway line between 1pm – 3pm. The shadow cast during this period is primarily attributed to the DA building envelope rather than the 30% uplift envelope.</li> </ul> <p>The building has been articulated and orientated to minimise shadow impacts as far as practicable. Taller buildings are a natural consequence of this densification, and some shadowing is inevitable. The shadow impacts resulting from the proposed development are considered short lived and reasonable given the dense urban context. The proposal will not restrict surrounding development achieving &gt; 2 hours of solar access in the winter solstice.</p>	<b>RTS Appendix D</b>
<p>Provide a Roof Plan for Building B which contains a spot height for the roof of the rooftop stair access structure.</p>	<p>The Roof Plan within the Architectural plans has been updated to identify the height of the rooftop stair access structure as RL225,140 at Building B (Drawing DA119).</p>	<b>RTS Appendix D</b>
<p>Provide detailed apartment plans for each type of apartment or label on the floor plans, the uses of each space within the apartments.</p>	<p>A separate set of General Arrangement Plans (DA910 - DA915) have been provided to annotate the uses of each space within the apartments.</p>	<b>RTS Appendix D</b>
<p>The BASIX Certificate submitted is dated more than three months prior to lodgement and is out-of-date. Provide an updated BASIX Certificate.</p>	<p>An updated BASIX certificate is submitted with this revised SSD package.</p>	<b>RTS Appendix I</b>
<p>Confirm no subdivision works form part of the application.</p>	<p>The SSDA does not propose subdivision works.</p>	<b>N/A</b>

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Provide an updated development timing schedule (section 3.5 of the EIS).	<p>The updated development timing schedule is noted below:</p> <ul style="list-style-type: none"> <li>▪ <b>Stage 1: Demolition &amp; Site Preparation:</b> March 2025 – August 2025</li> <li>▪ <b>Stage 2: Excavation &amp; Basement Construction:</b> August 2025 – October 2026</li> <li>▪ <b>Stage 3: Above Ground Works:</b> October 2026 – October 2028</li> </ul> <p>Consent was granted for demolition and removal of existing buildings and structures, site improvements and the removal of vegetation on site in December 2024 (DA-2024/19). Demolition has commenced under DA-2024/19.</p>	N/A
<b>Sydney Water</b>		
<p>Growth information Sydney Water supports government-backed growth initiatives within our area of operations, striving to provide timely and cost-effective water and wastewater infrastructure without undue impacts. To offer robust servicing advice and investigate staged servicing possibilities, we require the proponent to provide anticipated ultimate and annual growth data for this development as outlined in the enclosed Growth Data Form.</p>	Noted. To be addressed as part of the Section 73 Application (CN222249).	N/A
<p>Water Servicing The proposed development is in the Pymble Remainder Water Supply Zone (WSZ). Preliminary assessment indicates there is capacity in the trunk water system to service the proposed development. Amplifications, adjustments, deviations and/or minor extensions may be required. Detailed requirements will be provided at the Section 73 application stage.</p>	Noted. To be addressed as part of the Section 73 Application (CN222249).	N/A
<p>Wastewater Servicing Preliminary assessment indicates there is capacity in the trunk wastewater system to service the proposed development. Sydney Water understands deviation of the existing wastewater mains and ventshaft within the site are proposed. This will be assessed under CN216367 and/or CN222249. Further amplifications, adjustments, deviations and/or minor extensions may be required. Detailed requirements will be provided at the Section 73 application stage.</p>	Noted. To be addressed as part of the Section 73 Application (CN222249).	N/A

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<b>DCCEEW Water</b>		
<p>Ensure a water access licence (WAL) is obtained prior to take occurring to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018.</p>	<p>A Letter of Advice has been prepared to detail the findings of the previously completed 3D numerical groundwater model. The findings of the groundwater model predict:</p> <ul style="list-style-type: none"> <li>▪ A groundwater take of 4.53 ML/year during construction of the basement (i.e. excavation and establishment of the basement drainage system).</li> <li>▪ After construction of the drained basement (i.e. operational period), the groundwater take will reduce to &lt;3ML/yr after 5 years, decreasing to near steady-state conditions at 2.02 ML/year over time.</li> </ul> <p>Based on the predicted groundwater extraction volumes, groundwater quality underlying the site, and the impact assessment completed as part of the Dewatering Management Plan (submitted at RTS Appendix U), Reditus advise the proposed basement could be effectively constructed and managed with a drained basement design.</p> <p>Given that the site is mapped within the Sydney Basin Central Groundwater Source, under the Water Sharing Plan for the Greater Metropolitan Region Sources 2023, it is understood that a Water Access Licence (WAL) is not required.</p>	<p><b>RTS Appendix T</b> <b>RTS Appendix U</b></p>
<b>Heritage NSW - Aboriginal Cultural Heritage</b>		
<p>No comments / recommendations on the proposal provided. Recommended condition of consent provided.</p>	<p>The applicant accepts the recommended conditions of consent.</p>	<p><b>N/A</b></p>
<b>TfNSW</b>		
<p><b>Access Arrangements</b> While noting that the proposed development will increase yield, parking, and trip generation rates for this development site, TfNSW has concerns with the access arrangement at O'Brien Street, Railway Street and the Pacific Highway. Specifically, concerns regarding vehicles exiting O'Brien Street and wishing to enter the Pacific Highway via Railway Street. Given the obscured geometry of this intersection, motorists will have to cross two lanes of traffic to make somewhat of a semi U-turn manoeuvre to join the queue on Railway Street in order to turn left/right onto the Pacific Highway which has safety and network efficiency issues due to the higher trips that will be generated by the proposed development. As such, measures need to be identified to restrict manoeuvres from O'Brien St to left in left out only.</p>	<p>The applicant acknowledges TfNSW's comments and accepts the proposed vehicle access arrangements to restrict manoeuvres from O'Brien Street to left-in left-out.</p>	<p><b>N/A</b></p>

Request for Additional Information	Response	Appendix
<p>Construction Impacts Section 5.5 of the Traffic Impact Assessment (TIA - prepared by JMT Consulting, Project No. 2465, Rev A 10.1.25) details that 19m Single Articulated Vehicles (AVs) and 19m Truck and Dog Trailers will be used during construction. The TIA contains no traffic assignment diagram or swept paths showing how this length vehicle (or any others) accesses O'Brien Street without impacting other vehicular traffic using the road network or mounting kerbs. The swept path assessments provided should show required clearances and be undertaken at the correct design speed.</p>	<p>The updated Preliminary Construction Pedestrian Traffic Management Plan (<b>CPTMP</b>) provides swept paths showing the largest construction vehicle entering, manoeuvring and exiting the site (19m Single Articulated Vehicles (AVs) and 19m Truck and Dog Trailers). Vehicles will enter via Pacific Highway to the north and exit via O'Brien / Railway Street to the southern.</p> <p>It is noted that the preliminary CPTMP prepared to support the SSDA will need to be updated prior to the commencement of works, with further detail added following the appointment of a contractor. The updated CPTMP will be reinforced through an appropriately worded condition of consent which requires the CTPMP to assess the proposed access and operation of construction traffic associated with the proposed development with respect to safety and capacity. The Contractor will be responsible for preparing the CTPMP, ensuring the following are addressed:</p> <ul style="list-style-type: none"> <li>▪ Proposed construction vehicle routes;</li> <li>▪ Indicative construction programme;</li> <li>▪ Expected construction vehicle types and volumes;</li> <li>▪ Car parking arrangements and site access during construction;</li> <li>▪ Safety measures to minimise impacts to pedestrians and cyclists</li> </ul>	<p><b>RTS Appendix L</b></p>
<p>Sydney Trains: As the development site adjoins a rail corridor, separate comments should be obtained from Sydney Trains.</p>	<p>Noted.</p>	<p><b>N/A</b></p>
<p>Noise Impacts The provisions of Section 2.120 (Impact of road noise or vibration on non-road development) of State Environmental Planning Policy (Transport and Infrastructure) 2021 apply to the submitted application as the annual average daily traffic volume along this section of the Pacific Highway is more than 20,000 vehicles. As such, the applicant will need to demonstrate to the satisfaction of the determining authority that the application is able to comply with provisions contained in Section 2.120 of State Environmental Planning Policy (Transport and Infrastructure) 2021 specifically in relation to measures to ensure the required noise levels as detailed in Subclause 3 are not exceeded when the building is ready to be occupied.</p>	<p>Section 6.2 of the NVIA establishes internal noise criteria in-line with the SEPP (Transport and Infrastructure) and NSW Planning guidelines.</p> <p>Mitigation measures are discussed in Section 9.2 of the NVIA which proposed measures in the form of minimum acoustic performances for the building envelope (façade glazing and lightweight walls) and alternative ventilation strategies. The proposed mitigation measures are based on the results of long-term noise monitoring and 3D noise modelling.</p>	<p><b>RTS Appendix P</b></p>
<p>Car parking The determining authority should ensure that the layout of the proposed car parking area associated with the subject development (including, driveways grades, turn paths, sight distance requirements in relation to landscaping and/or</p>	<p>The proposal complies with the relevant requirements of the Australian Standards. It is noted that a traffic engineering certificate will be required to be prepared prior to the commencement of construction, to the satisfaction of the PCA, confirming the parking layout is compliant with AS2890.1.</p>	<p><b>N/A</b></p>

Request for Additional Information	Response	Appendix
<p>fencing, aisle widths, aisle lengths, heights/clearances for loading bays/disabled car parking, parking bay dimensions, etc) should be in accordance with Australian Standards (AS) 2890.1-2004, AS2890.6-2009 and AS2890.2-201.</p>		
<p><b>SP2 Zoned Land</b> TfNSW advises that the property is located within an area under investigation for a future road proposal. Its investigations have not yet advanced to the stage where options have been defined, and accordingly, it is not possible at this time to identify if any part of the subject land will be required to accommodate this proposal (i.e. a lesser portion of land that is currently identified as SP2 may be required). TfNSW, at this time, has no committed funding for any works along this section of the Pacific Highway.</p>	<p>Noted. Whilst the SP2 Infrastructure (Classified Road) land is included in the land to which the SSDA relates, the land is devoid of any built form or structures. The proposed development has been designed in consideration of TfNSW's future road proposal, should this progress in the future.</p> <p>The proposed development does not rely upon SP2 zoned land to achieve compliance with any planning or design controls, for instance in relation to the LEP or the ADG. For the purposes of assessing the SSDA against relevant planning considerations, the development site comprises the land zoned MU1 (Mixed Use).</p>	<p><b>N/A</b></p>
<p><b>Strategic Design</b> Should works be proposed within the road reserve (i.e. at the O'Brien Street, Railway Street and the Pacific Highway intersection) then a concept plan will need to be prepared to clarify the scope of works, demonstrate the works can be constructed within the road reserve and allow the consent authority to consider any environmental impacts of the works as part of their Part 4 assessment. The strategic design should address the requirements as detailed in the TfNSW Strategic Design Requirements fact sheet, which is accessible through the following link: Strategic Design Fact Sheet.</p>	<p>A 12m long median strip is proposed to Railway Street at the junction of Railway Street, O'Brien Street and Pacific Highway to enforce the left in / left out arrangement at O'Brien Street and ensure safety at this intersection.</p> <p>Billbergia will accept a suitably worded condition requiring the submission and approval of a Concept Plan to TfNSW, prior to the first CC for above ground works.</p>	<p><b>N/A</b></p>
<p><b>Ausgrid</b></p>		
<p>The proponent must discuss any new connections and load requirements to the site directly with Ausgrid and submit a connection application to Ausgrid as soon as practicable. The Ausgrid submission focuses on advice notes.</p>	<p>Noted.</p>	<p><b>N/A</b></p>
<p><b>Sydney Metro</b></p>		
<p>Noise and Vibration Impact Assessment Report: An updated Noise and Vibration Impact Assessment Report to assess the impact of the new proposed changes.</p>	<p>An Acoustic Assessment for Rail Noise and Vibration is submitted with this revised SSDA Package.</p>	<p><b>Appendix Z</b></p>

Request for Additional Information	Response	Appendix
Structural Assessment Report: To be provided to evaluate proposed building structure and building loads to ensure no adverse impacts on the Sydney Metro rail lines.	A Structural and Engineering Impact Assessment Report ( <b>RTS Appendix AA</b> ) and Structural General Arrangement Plans ( <b>RTS Appendix CC</b> ) have been prepared by Cadigal Group to respond to Sydney Metros comment.	<b>Appendix AA</b> <b>Appendix CC</b>
Geotechnical Assessment Report: To be provided with analysis to demonstrate the predicted displacements induced by the construction of the proposed development will not have negative impacts on Sydney Metro Northwest rail corridor, with ground conditions and groundwater conditions identified from site specific geotechnical investigation.	A Geotechnical Railway Impact Assessment is submitted to address this Sydney Metro comment.	<b>Appendix DD</b>
<b>Sydney Trains</b>		
The Applicant/Developer shall prepare and provide to Sydney Trains for review, comment, and written endorsement the following final version items in compliance with the relevant AMB Standard. Applicant to address the following deferred commencement conditions.		
1. Geotechnical and Structural report/drawings that meet Sydney Trains' requirements. The Geotechnical Report must be based on actual borehole testing conducted on the site closest to the rail corridor.	A Structural Engineering Report on Shoring Arrangement Adjacent to the Railway Corridor ( <b>RTS Appendix BB</b> ) and Geotechnical Railway Impact Assessment ( <b>RTS Appendix DD</b> ) has been prepared to respond to Sydney Trains' comment.	<b>Appendix BB</b> <b>Appendix DD</b>
2. Construction methodology with construction details pertaining to structural support during excavation. The Applicant is to be aware that Sydney Trains will not permit any rock anchors/bolts (whether temporary or permanent) within its land or easements.	The Construction Methodology is detailed within the Structural Engineering Report on Shoring Arrangement Adjacent to the Railway Corridor ( <b>RTS Appendix BB</b> )	<b>Appendix BB</b>
3. Cross sectional drawings showing the rail corridor, sub soil profile, proposed basement excavation and/or structural design of sub ground support adjacent to the rail corridor. All measurements are to be verified by a Registered Surveyor.	A Detailed Sections and Survey Plan is provided at <b>RTS Appendix EE</b> .	<b>Appendix EE</b>
4. Detailed Survey Plan showing the relationship of the proposed development with respect to Sydney Trains' rail corridor land and easements.	A Detailed Sections and Survey Plan is provided at <b>RTS Appendix EE</b> .	<b>Appendix EE</b>
5. If required by Sydney Trains, an FE analysis which assesses the different stages of loading-unloading of the site and its effect on the rock mass surrounding the rail corridor.	The FE analysis is addressed as part of the Geotechnical Railway Impact Assessment.	<b>Appendix DD</b>
6. If required by Sydney Trains, a Monitoring Plan.	The Monitoring Plan is addressed as part of the Geotechnical Railway Impact Assessment.	<b>Appendix DD</b>

Request for Additional Information	Response	Appendix
The Sydney Trains submission also recommends operational conditions.	Noted. The Applicant accepts Sydney Trains' recommended conditions.	
<b>Public Submitters</b>		
<p>Tal Holdings Ltd &amp; the Federal Group  On-street parking impacts  Cumulative impacts from 845 Pacific Highway, Chatswood (SSD-61559214)  Excessive car parking leading to traffic impacts  Breach of development standards  Noise and Vibration attributed to commercial and childcare uses  Construction Impacts  Overshadowing  Cumulative Development Impacts</p>	<ul style="list-style-type: none"> <li>▪ <b>Parking:</b> the provision of any additional on-street car parking spaces will be assessed and managed by Council. The provision of on-street car parking cannot suitably be addressed under this application, as Council's intentions for future parking is unknown.</li> <li>▪ <b>Cumulative Impact from 845 Pacific Highway:</b> The SSDA at 845 Pacific Highway has not yet been lodged and therefore the traffic impacts / trip generation from this development are not yet known and cannot be assessed.</li> <li>▪ <b>Car parking:</b> is provided in accordance with the non-discretionary development standards (car parking) in the Housing SEPP. The modelling in the Transport Impact Assessment concludes that the nearby intersections would maintain their existing level of service with negligible changes in overall delay times of one second or less compared to current conditions. It is expected that residents will still be walking to access the local shops and services given the site's adjacent proximity to the Chatswood CBD and the Rail Station and Metro. The Green Travel Plan outlines measures to encourage a modal shift away from private vehicles.</li> <li>▪ <b>Breach of development standards:</b> The proposed height and FSR has been established through incentives provided by the in-fill affordable housing provisions of the Housing SEPP.</li> </ul> <p><b>Height Variance</b>  While the majority of the built form complies with the height limit, some rooftop elements protrude the height to a maximum 121.53m which represents a 3.9% height breach. The proposal is compatible with emerging tall tower forms in the Chatwood CBD. The VIA accompanying the SSDA confirms that the proposal has a high level of compatibility with the surrounding visual character. The VIA concludes that balance, the visual effects and view impacts caused by the proposed development are considered to be reasonable and acceptable and as such the proposal can be supported on visual impact grounds.</p> <p><b>FSR Variance</b>  The proposed development exceeds the 9.04:1FSR controls (including Housing SEPP bonus) by 1.24:1, which represents a 15.9% FSR breach.  The variation to the FSR is a direct result of the inclusion of wintergardens (on the eastern façade) and enclosure of the breezeways contributing to the GFA calculations. These design moves are essential to improving resident amenity and safety. Given the circumstances of the proposal the Clause 4.6 Variation</p>	<p><b>RTS Appendix E</b>  <b>RTS Appendix F</b>  <b>RTS Appendix Q</b>  <b>RTS Appendix L</b>  <b>RTS Appendix D</b></p>

Request for Additional Information	Response	Appendix
	<p>Request (<b>RTS Appendix E</b>) demonstrates there are sufficient planning grounds to justify contravention of the development standard.</p> <ul style="list-style-type: none"> <li>▪ <b>Noise and Vibration:</b> The use of retail and commercial spaces have not yet been determined as the proposal provides for the provision of cold-shell tenancies only. The specific uses have not yet been determined therefore the noise impacts are unable to be appropriately assessed. Noise Impacts from the future commercial use would be subject to any future application associated with the use and fit out of each tenancy. A separate Childcare Noise and Vibration Impact Assessment has been prepared to assess the potential noise and vibration impacts associated with the proposed childcare on level 2 (<b>RTS Appendix Q</b>)</li> <li>▪ <b>Construction Impacts:</b> An updated preliminary CTMP is submitted with this revised SSDA package. A comprehensive Construction Management Plan, Construction Environmental Management Plan and Construction Traffic Management Plan will be prepared post-approval. These documents will be prepared by the appointed contractors and outline measures to address noise, dust, vibration and traffic impacts during the construction stage.</li> <li>▪ <b>Overshadowing:</b> The shadow diagrams have been updated in the revised Architectural Plans. The shadow diagrams demonstrate there is no additional overshadowing to the submitters property (812 Pacific Highway) as a result of the proposed development.</li> <li>▪ <b>Cumulative Impacts:</b> The EIS considers the cumulative impacts of surrounding development based on the current publicly available information.</li> </ul>	
Excessive car parking	As noted elsewhere in this submission, car parking is provided in accordance with the car parking standards within the Housing SEPP. The use of nearby public transport will be encouraged through the initiatives outlined in the Green Travel Plan.	<b>N/A</b>
Traffic Impacts	<p>The Traffic Impact Assessment confirms that:</p> <ul style="list-style-type: none"> <li>▪ Access from O'Brien Street was selected to maximise the distance away from the Pacific Highway intersection and minimise conflicts with pedestrians and general traffic.</li> <li>▪ The provision of car parking is consistent with the non-discretionary development standards in the Housing SEPP (residential) and Willoughby DCP (commercial, retail and visitor).</li> <li>▪ The expected traffic generation arising from the proposal is relatively minor and can be accommodated on the surrounding road network.</li> <li>▪ Traffic and parking impacts associated with the proposed development can be managed in a way that encourages active transport and alleviates any increased pressure on the local road network.</li> </ul>	<b>EIS Appendix Y</b>

Request for Additional Information	Response	Appendix
Construction Impacts	As noted above, comprehensive Construction Management Plans will be prepared prior to the issue of a Construction Certificate. The Construction management Plan will outline measures to address noise, dust, vibration and traffic impacts during the construction stage.	<b>N/A</b>
Future Road Widening	As noted above, the proposal has been designed to make provision for future road widening if required by TfNSW. The SP2 zoned land is devoid of any built form or structures.	<b>N/A</b>
Loss of Privacy at 11 Railway St	<p>The building envelope is setback 18,300mm from 11 Railway Street (across O'Brien Street). This building separation is compliant with the visual privacy requirements under the ADG.</p> <p>The tower contains a continuous facade, subtly modulating to accommodate specific acoustic, privacy and shading requirements. Vertical and horizontal blades across all sides provide a visual depth and a degree of sun shading. Privacy screening is integrated when necessary to address visual privacy requirements.</p>	<b>N/A</b>
View Loss	<p>The Visual Impact Assessment (<b>VIA</b>) submitted with the original SSDA assesses that the proposal will not block views to any heritage items, or areas of unique scenic quality.</p> <p>The proposal, while prominent in the assessed views, does not contrast substantially with existing built-form elements and appears as an equally prominent and comparable addition to the composition.</p> <p>The VIA concludes that the visual effects and view impacts caused by the proposed development are considered to be reasonable and acceptable and as such the proposal can be supported on visual impact grounds.</p>	<b>EIS Appendix S</b>
Overshadowing to 11 Railway Street	The overshadowing diagrams demonstrate the proposed development will result in overshadowing to parts of 11 Railway Street throughout the day. The shadow impacts are most significant between 11am and 2pm, impacting the northern portion of the building. As the shadow moves across the building from west to east throughout the day, all parts of the building obtain at least 2 hours of sunlight access. There is minimal additional overshadowing impact to 11 Railway Street resulting from the additional height above the compliant height limit.	<b>RTS Appendix D</b>
Development incompatible with the neighbourhood / overdevelopment of the site.	As noted above, the proposed height and GFA has been established through incentives provided by the in-fill affordable housing provisions of the State Environmental Planning Policy (Housing) 2021.	

Request for Additional Information	Response	Appendix
	<p>Majority of the built form complies with these controls, other than roof features exceeding the maximum height standard and the enclosure of balconies and breezeways resulting in an exceedance to the FSR standard (albeit improving residential amenity).</p> <p>The proposal has also undergone an architectural design competition in accordance with the Willoughby LEP. The additional 30% density available under the SSD pathway has been carefully applied to the competition winning scheme via a GA NSW endorsed “Bridging Design Excellence Strategy”.</p> <p>The design of the building and layout is generally consistent with the desired future character of the area as envisaged in the Chatswood CBD Strategy. Chatswood CBD is characterised by high-density commercial and residential developments surrounding Chatswood Railway Station. The slender towers design, as well as the materials and colour palette have been carefully selected to create a cohesive response to the existing and envisioned future character of the area.</p>	

## Response to Willoughby City Council Submission

A detailed response to Willoughby City Council Submission (1 May 2025) is provided in the Table below.

Submission	Applicant Response	Appendix Reference
<b>1. Engagement prior to SSDA lodgement</b>		

Submission	Applicant Response	Appendix Reference
<p>This exhibition represents the first comprehensive review opportunity for Council regarding the subject SSDA. Notwithstanding this, Council has reviewed a separate development application that is the subject of Land and Environment Court proceedings.</p>	<p>Noted.</p>	<p>N/A</p>
<p><b>2. SP2 Infrastructure (Classified Road) land</b></p>		
<p>The proponent has suggested that TfNSW is reassessing its acquisition requirements regarding the SP2 land on-site. Until such point as the Transport for NSW (TfNSW) position is formally clarified, Council supports the progression of the SSDA on the basis that all the current SP2 zoned land fronting the Pacific Highway and located on the subject site is required for road widening and site design is based on the MU1 zoned land (including FSR and treatment of the Pacific Highway frontage). In Council's view, any changes to this SSDA as a result of the TfNSW position on the SP2 Infrastructure (Classified Road) component of the site, requires re-exhibition and further consideration by Council and the community.</p>	<p>As stated in the EIS, whilst the SP2 Infrastructure (Classified Road) land is included in the land to which the SSDA relates, the land is devoid of any built form or structures. The proposed development does not rely upon SP2 zoned land to achieve compliance with any planning or design controls, for instance in relation to the LEP or the ADG. For the purposes of assessing the SSDA against relevant planning considerations, the development site comprises the land zoned MU1 (Mixed Use).</p> <p>Clause 5.1A of the LEP applies to the SP2 zoned land (as a "Classified Road"). Clause 5.1A(3) provides that development consent must not be granted to any development other than development for the purpose of a "road". Pursuant to the Land Use table in Part 2 of the LEP, development within the SP2 Zone that is "ordinarily incidental or ancillary to development for that purpose (i.e. the road)" is permitted with consent. The proposal provides additional landscaping elements within the SP2 zone to complement the landscaping and public domain elements delivered on the site (being the land zoned MU1). The inclusion of the SP2 zone into the scope of the SSDA allows the proposal to deliver additional soft landscaping, canopy trees, and seating areas beyond what would otherwise be provided if the development site was exclusively the MU1 zoned land.</p> <p>Consistent with the Land Use table in Part 2 of the LEP, these additional landscape elements are considered "ancillary to development for the purpose of the road" and permitted with consent. [If an alternative interpretation is taken that these landscape elements were not in fact "ancillary" or "incidental" to a road, all these landscaped elements would have to be removed from the scope of the proposed development]. In effect, these additional landscape elements provide an "interim" solution until such time that the land is compulsorily acquired by the relevant authority for future road widening works. It is evident that this "interim" solution provides a significantly enhanced public domain outcome as opposed to separating the SP2 land from the development site (being the MU1 zoned land) and leaving it undeveloped until such time as it is compulsorily acquired by the relevant authority. The "interim" solution improves the amenity, appearance, and environmental conditions of the pedestrian interface to Pacific Highway.</p> <p>Critically, the SP2 zoned land is not included in the development area for the purposes of assessing compliance with any planning or design numerical controls (such as those relating to ground level setback distances, soil zone areas, soft landscaping etc).</p>	<p>N/A</p>

Submission	Applicant Response	Appendix Reference
	<p>As a further consideration, in December 2023 the applicant received correspondence from TfNSW advising that the proposed road widening envisaged by the SP2 zoning had been reduced. Specifically, TfNSW indicated that the land to be compulsorily acquired will be reduced from 457 sqm (as per the existing SP2 zoning) to 190 sqm. Accordingly, some 267 sqm of land currently zoned SP2 will not be compulsorily acquired by TfNSW and can instead be maintained as an additional landscaped area.</p> <p>Further to the correspondence from TfNSW in December 2023, TfNSW's submission to the SSDA (dated 2 May 2025) states the following regarding the SP2 Zoned land:</p> <p><i>"TfNSW advises that the property is located within an area under investigation for a future road proposal. Its investigations have not yet advanced to the stage where options have been defined, and accordingly, it is not possible at this time to identify if any part of the subject land will be required to accommodate this proposal (i.e. a lesser portion of land that is currently identified as SP2 may be required). TfNSW, at this time, has no committed funding for any works along this section of the Pacific Highway."</i></p>	

### 3. Consistency with Housing SEPP

<p>Having regard to the In-fill Affordable Housing Practice Note, it is noted that in-fill affordable housing bonuses do not override any LEP height control.</p> <p>Council seeks for any proposal on this site to have appropriate regard to development parameters established in existing controls, the location within the northern extension of the Chatswood CBD, the site specific DCP in WDCP Part L: Placed Based Plans and other relevant provisions of the WDCP with particular regard to car parking. A revised scheme is sought addressing the unacceptable height, FSR and parking non-compliances.</p>	<p>As detailed in the EIS, the GFA and building height have been established using the floor space ratio (<b>FSR</b>) and building height incentives for infill affordable housing pursuant to Chapter 2, Part 2, Division 1 of the Housing SEPP. The proposed development is made under the Housing SEPP and the GFA and building height have been established in addition the permissible FSR and building height development standards of the LEP. DPHI's <i>In-fill Affordable Housing Practice Note (December 2023)</i> states as follows:</p> <p><i>"The in-fill affordable housing bonuses do not override any provision in any LEP or other EPI. However, local development standards should be applied flexibly and need to be balanced against the need to realise more affordable housing."</i></p> <p>The proposed development does not override the FSR and building height development standards of the LEP. Rather, it utilises the in-fill affordable housing FSR and height of building bonuses under Chapter 2, Part 2, Division 1 of the Housing SEPP in order to deliver significant public benefit through the provision of 15% affordable housing.</p>	<p>N/A</p>
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### 4. Site location in northern extension of Chatswood CBD

<p>Density on this site should reflect what has been planned for the northern CBD extension (with a maximum height and FSR of 90m and 6:1), noting the constrained surrounding road network and the surrounding site context.</p>	<p>The SSDA utilises legislation gazetted by the NSW Government that introduces an SSDA pathway for large scale residential developments with a cost over \$75 million, provided that at least 10% of the residential component of the development will be used for affordable housing for a minimum of 15 years. These provisions allow a 30% uplift in the maximum permitted height and FSR controls that apply to the land.</p>	<p>N/A</p>
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Submission	Applicant Response	Appendix Reference
<p>The site has high visibility to the west, noting the Pacific Highway is a ridge with land to the west beyond the Pacific Highway falling away, and the existing development at 11 Railway Street directly to the south, requires an appropriately sensitive redevelopment response.</p> <p>The development should establish an appropriate relationship with the existing tower to the south (11 Railway Street), which has a height of RL 246.8 and an FSR of 7:1.</p>	<p>The density of the proposed development is consistent with the FSR and building height development standards that apply to the site utilising the incentives for infill affordable housing pursuant to Chapter 2, Part 2, Division 1 of the Housing SEPP. The FSR (7.8:1) and building height (117 metres) development standards, which cumulatively establish the 'density' of development, are established under the provisions of the Housing SEPP. The proposed development responds to the Government's policy initiative introduced in November 2023 to incentivise and support the delivery of high quality affordable housing.</p> <p>Incentivising the delivery of new dwellings, including affordable housing, through the Housing SEPP is critical to ensuring that New South Wales can deliver on its commitments under the National Housing Accord to deliver 377,000 new dwellings, including 15,800 social and affordable dwellings, by 2029.</p> <p>The proposal considers the relationship to 11 Railway Street as:</p> <ul style="list-style-type: none"> <li>▪ Appropriate separation distances are provided between the nearest tower by approximately 23m on the lower podium portion (habitable to non-habitable condition) and 26m separation on the upper tower portion.</li> <li>▪ The above separation minimises shadow impact to the apartments and communal open space at 11 Railway Street, retaining adequate outdoor and indoor amenities for the respective residents.</li> <li>▪ The proposed apartments have been orientated toward the Railway line, away from the neighbouring towers adequately mitigate acoustic, privacy and visual impact.</li> </ul>	

## 5. Recent site history

In regards the LEC proceedings related to the Regional DA (DA-2024/47), amended and changed information has continued to be provided by the proponent as of the date of this exhibition. There is uncertainty whether the plans and information in this SSDA reflect what is being considered by LEC. The subject SSDA is a new application on this site and requires a fresh and detailed assessment. Regard should be made to the established controls including WLEP 2012, the site specific development control plan and other relevant sections of WDCP.

The proposed development has been amended (in part) to provide consistency with amended documentation submitted to Council for the Regional DA (DA-2024/47). The Schedule of Design Revisions (identified in **RTS Appendix X**) identify the scope of amendments to the SSDA which reflect and are generally consistent with amendments made to the Regional DA during the Section 34 conciliation process. The amendments made to the Regional DA (which Council publicly exhibited between 6 May– 20 May 2025) reflect negotiations between the applicant and Council and resolution to contentions.

The SSDA is consistent with the relevant statutory requirements of the applicable environmental planning instruments, including the Housing SEPP and LEP. For the reasons detailed in the EIS and the accompanying documentation, the SSDA as a standalone project has significant merit and is capable of development consent.

Section 2.10(1)(a) of the Planning Systems SEPP provides that a development control plan (**DCP**) does not apply to State significant development. Notwithstanding, the SSDA does give consideration (to the extent relevant) to the site-specific DCP for the site (gazetted on 26 May 2023) contained within Section 13.1.15 of the Willoughby DCP.

**RTS Appendix X**

Submission	Applicant Response	Appendix Reference
<b>6. Design Excellence</b>		
<p>The EIS should state that the jury confirmed “potential” for design excellence and that further work was required (page 10 of EIS). Consistency is to be shown between EIS Justification and Section 6.1.1 Design Quality and should reflect the Council comments.</p>	<p>As detailed in the EIS, PBD Architects have designed the proposal in accordance with the principles of design excellence established in an architectural design competition. The applicant has invested in a Government Architect NSW (<b>GANSW</b>) endorsed design excellence process to ensure the built form achieves the vision of the original design competition winning scheme. The SSDA scheme maintains integrity of the winning scheme. Design development was managed through a GANSW endorsed “Bridging Design Excellence Strategy”. The SSDA has been subject to a Design Integrity Panel (<b>DIP</b>) process to ensure the design is capable of achieving design excellence.</p> <p>The Design Integrity Panel Report (dated 19 November 2024) submitted with the original SSDA was prepared on behalf of the Design Integrity Panel (<b>Panel</b>) to provide confirmation of the design elements which were supported and those that required further refinement and resolution. Table 3 of the Report identifies additional matters to be considered prior to the submission of the SSDA. These additional matters related to the following:</p> <ul style="list-style-type: none"> <li>▪ Solid balustrade upturn to residential balconies up to Level 9;</li> <li>▪ Thermal comfort of apartments to the eastern façade;</li> <li>▪ Lift lobbies to towers (Levels 3 - 35); and</li> <li>▪ Connecting with Country.</li> </ul> <p>It is important to note that DIP Chair confirmed (via signature) that the DIP Report was an accurate record of the DIP feedback and that the DIP endorses by consensus the observations and clarifications contained within the Report.</p> <p>The amended Urban Design Report provides a detailed design response to each of the matters identified by the Panel and listed in the DIP Report.</p>	<p><b>RTS Appendix MM</b></p>
<p>The DIP raised comments in regard to Thermal Comfort, Connecting with Country and Communal Open Space. The Landscape submission and Aboriginal Cultural Heritage Assessment do not adequately reference how the development/design integrates or reflects Design with Country. Provide detail regarding the increase in communal Open Space from the shown in the documentation reviewed by the DEIRP.</p>	<p>As described in the DIP Report submitted with the original SSDA, the Panel provided the following comments regarding the thermal comfort of apartments and Connecting with Country:</p> <ul style="list-style-type: none"> <li>▪ <b>“Thermal Comfort of Apartments to the Eastern Façade:</b> <i>The Panel has reviewed the supporting letter from GreenPerch (1/11/24) outlining the testing and performance of the east-facing apartments including the semi-enclosed balconies. The design team is encouraged to consider the integration of a number of GreenPerch’s recommendations prior to submission including passive shading elements, glazing and frame specification, and ceiling fans to units and balconies, to establish comfortable levels of amenity for all dwellings.”</i></li> </ul>	<p><b>EIS Appendix L RTS Appendix MM RTS Appendix V</b></p>

Submission	Applicant Response	Appendix Reference
	<ul style="list-style-type: none"> <li>▪ <b>“Connecting with Country:</b> <i>Continue to develop the Connecting with Country strategy to inform and enrich the architectural and landscape proposal including the integration of public art and naming opportunities in the public and private domains.”</i></li> </ul> <p>The EIS and the Urban Design Report (<b>RTS Appendix MM</b>) provide the following design responses to the comments regarding thermal comfort and Connecting with Country.</p> <ul style="list-style-type: none"> <li>▪ <b>“Thermal Comfort of Apartments to the Eastern Façade:</b> <i>High performance glazing and shading devices have been incorporated to the design. Ceiling fans can be incorporated during the detailed design stage for circulation of stagnant air. Refer to the ESD Report accompanying this submission for detail on thermal comfort.”</i></li> <li>▪ <b>“Connecting with Country:</b> <i>The choice of materials, finishes, and landscape design has been thoughtfully designed to ensure appropriate integration with Country. Billbergia is committed to fostering a connection with the local environment through the public art design. The public art design is to be developed during the detailed design stage.”</i></li> </ul> <p>A Public Art Strategy has been prepared by PBD (<b>RTS Appendix V</b>) which identifies opportunities for integration of Design for Country principals into the Public Art. The Strategy will be developed throughout the detailed design stage including further consultation with a specialist Indigenous design consultant and other stakeholders as required. The Strategy includes 4 potential locations for the public art and will Integrate Design for Country Principals to inform and enrich the architectural and landscape proposal.</p> <p>As described in the DIP Report submitted with the original SSDA, the Panel provided the following comments regarding communal open space:</p> <ul style="list-style-type: none"> <li>▪ <i>“The Panel commented on the fact that there is no increase in communal open space in the new scheme, despite an increase in residents. The Panel notes that there is already a large component of communal open space with a diversity of uses and services, but commented that an increase in communal open space is something to consider.”</i></li> </ul> <p>The proposal provides public open space at ground level and residential communal open space at Level 02. These open spaces achieve high quality, safety, and useability. The communal open space is designed to allow residents and visitors to engage in informal gathering, health and wellbeing activities, casual recreation, and active play areas for children.</p> <p>In addition to communal open space, all units have access to outdoor balconies or wintergardens. The site layout allows access to direct sunlight to living areas and balconies achieving 98% 2 hour solar access.</p>	

Submission	Applicant Response	Appendix Reference
<p>The extent of façade glazing is a departure from the scheme, this outcome results in a 'glazed' façade to the Eastern Elevation.</p> <p>Glazed facades have not been generally supported through the Design Excellence process as delivering or achieving Design Excellence/satisfying WLEP Clause 6.23.</p> <p>This outcome is a departure from the Competition selected scheme, and if retained despite Council concern, is required to be considered by the DEIRP. Other solutions to glazing as a means to address TfNSW requirements should be explored.</p>	<p>The EIS and Urban Design Report provide a detailed design response to the Panel's comments regarding the thermal comfort and performance of the east-facing apartments. Specifically, the Panel encouraged the design team to "consider the integration of a number of GreenPerch's recommendations prior to submission including passive shading elements, glazing and frame specification, and ceiling fans to units and balconies, to establish comfortable levels of amenity for all dwellings". High performance glazing and shading devices have been incorporated to the design.</p>	<p><b>RTS Appendix MM</b></p>
<p>Public Realm - O'Brien St - Provide an integration Plan showing the proposed/preferred treatment to the public/service O'Brien Street as a potential 'Shared Zone'.</p>	<p>The Architectural Plans provide a section of the driveway and Plan of Ground floor relative to the driveway access (Drawing DA301).</p> <p>The Landscape Plans provide a Section of O'Brien Street showing steps access to the site.</p>	<p><b>RTS Appendix D</b> <b>RTS Appendix J</b></p>
<p>The design excellence process informs an application and a consent authority, among a number of elements to be assessed – with any scheme subject to change under the SSDA and in response to the exhibition and subsequent submissions. It does not presume approval of the competition scheme in the SSDA and it is Council's view, that in this case, the scheme requires significant amendments.</p>	<p>Noted.</p>	<p><b>N/A</b></p>
<p><b>7. Amendments required for the development to satisfactorily address public benefit</b></p>		
<p>Below is a detailed assessment of the proposal, with amendments required for the proposed development to satisfactorily address public benefit.</p>		
<p>Height on CBD boundary A height of 120.05 was not anticipated for this location and represents a departure from recent DPHI direction, where the height for the extended northern section of the Chatswood CBD was generally supported at 90m, transitioning down towards low density residential conservation areas. The establishment of the 90m height control on this site, under Amendment 34 dated 30 June 2023,</p>	<p>This SSDA capitalises on the NSW Government's building height uplift policy under Chapter 2, Part 2, Division 1 of the Housing SEPP that incentivises the delivery of new infill affordable housing to meet the needs of very low, low and moderate income households. The incentive brings together all levels of government, investors, and the private sector to unlock high quality affordable housing supply over the medium term. The proposal is eligible to utilise the infill affordable housing bonuses under the Housing SEPP, allowing a maximum of 30% additional height above the maximum height plane.</p>	<p><b>N/A</b></p>

Submission	Applicant Response	Appendix Reference
<p>represented a 375% increase above the previous WLEP 2012, 24m height maximum.</p> <p>In accordance with the In-fill Affordable Housing Practice Note, December 2023 (P.13):</p> <p>The full extent of the in-fill affordable housing bonuses may not be achieved on all sites, due to site constraints and local impacts. The in-fill affordable housing bonuses should not be treated as an entitlement.</p> <p>The proposed additional 30.05m height in this location is considered inappropriate due to the location on the CBD boundary opposite (west) of R3 Medium density residential development in the form of two and three storey flat buildings. Concern is also raised in regards the relationship with 11 Railway Street to the south. The proposed increase in height undermines recent strategic planning and community faith in the NSW planning system. Council does not support any further increase in height above the existing height controls in this location above 90m.</p>		
<p>The following comments were made in regard to the Clause 4.6 Variation Request (Height). It is incorrect to state that all surrounding development is expected to be 120.05m or thereabouts.</p> <p>Land to the west is not subject to CBD uplift and has a height maximum of 12m.</p> <p>There is no discussion in regards why the proposed development cannot be designed in accordance with the height expected under the WLEP and SEPP controls. Justification should be provided in this regard.</p> <p>The building opposite at 11 Railway Street is the closest building to the subject redevelopment. It is noted that the greater non-compliance occurs on the tower closest to O'Brien Street (and therefore 11 Railway Street).</p> <p>11 Railway Street has significant changes in built form, with the lowest side presenting to the subject site. There is also a ground level communal area including a pool adjacent O'Brien Street.</p>	<p>Applying the 30% uplift bonus pursuant to the applicable environmental planning instrument (the Housing SEPP), the maximum building height for the site is 117 m. The proposal has a maximum building height of 121.53m, which is an exceedance of 3.9%.</p> <p>The Clause 4.6 variation request (Height) (<b>RTS Appendix F</b>) has been revised to provide further justification for the minor exceedance (3.9%) to the maximum building height development standard (117 metres) pursuant to Clause 18 of the Housing SEPP. The revised Clause 4.6 variation request demonstrates that strict compliance with the building height development standard is unreasonable and unnecessary.</p> <p>For the reasons detailed in the revised Clause 4.6 variation request, the proposed development and the minor exceedance to the building height development standard will provide for a better planning outcome than a strictly compliant development. There are sufficient environmental planning grounds to warrant contravention to the height of building development standard (117 metres) pursuant to Clause 18 of the Housing SEPP.</p>	<p><b>RTS Appendix F</b></p>

Submission	Applicant Response	Appendix Reference
<p>Floor Space Ratio on CBD boundary In the view of Council, the appropriate FSR for this site 6:1. If FSR is to be permitted by DPHI, then 7.8:1 is permitted. The proponent is seeking a further increase of 0.66:1 to 8.46:1, which is not anticipated for this site under WLEP 2012 and the Housing SEPP, or TfNSW Transport Asset Standards Guide to Airspace and External Developments.</p>	<p>Applying the 30% uplift bonus pursuant to the applicable environmental planning instrument (the Housing SEPP), the maximum FSR for the site is 7.8:1. The proposal has a maximum FSR of 9.09:1, which is an exceedance of 1.24:1 (16.5%).</p> <p>The Clause 4.6 variation request (FSR) (<b>RTS Appendix E</b>) has been revised to provide further justification for the exceedance (16.5%) to the maximum FSR development standard (7.8:1) pursuant to Clause 16 of the Housing SEPP. The revised Clause 4.6 variation request demonstrates that strict compliance with the FSR development standard is unreasonable and unnecessary in the circumstances of the proposal and that there are sufficient and positive environmental planning grounds to justify contravention.</p>	<p><b>RTS Appendix E</b></p>
<p>It is unclear why wintergardens on the eastern and northeastern facades cannot be designed in a compliant form. A reasonable and appropriate contribution to housing supply can be made on this site without compromising design quality and within the relevant planning controls.</p>	<p>As detailed in the EIS, the provision of wintergardens on the eastern and north-eastern façades is a deliberate strategic design move to improve the amenity of the residential apartments on these façades, which are within proximity of the rail corridor boundary. This design approach adheres to TfNSW's standards by limiting opening sizes to minimize potential throw risks to the rail corridor whilst maintaining natural cross ventilation.</p>	<p>N/A</p>
<p>The proposed additional 2.46:1 FSR above the 6:1 under WLEP 2012, and 0.66:1 FSR above the 7.8:1 under the Housing SEPP is considered inappropriate due to the location on the CBD boundary opposite (west) of R3 Medium density residential development in the form of two and three storey flat buildings. The opportunity exists through design to minimise the width of the two towers proposed, with particular regard to the presentation west and east, and increase tower setbacks north and south.</p>	<p>As detailed above, the revised Clause 4.6 variation request (FSR) (<b>RTS Appendix E</b>) demonstrates that strict compliance with the FSR development standard under Clause 16 of the Housing SEPP (7.8:1) is unreasonable and unnecessary in the circumstances of the proposal and there are sufficient and positive environmental planning grounds to justify contravention.</p>	<p><b>RTS Appendix E</b></p>
<p><b>Non-residential floor space</b></p>		
<p>The SSDA proposes 87.7% residential floor space and 12.3% non-residential floorspace over the whole proposed development. This is not consistent with the land use mix Council has planned for the MU1 zone within the Chatswood CBD. In Council's view it is consistency with the WLEP 2012 Clause 6.25, 17% non-residential minimum floor space requirement is entirely achievable, noting that Council planning controls permit non-residential land uses within the tower form, not just in the podium.</p>	<p>Clause 6.25 of the LEP provides that development consent for shop top housing on land in Zone MU1 Mixed Use must not be granted unless the consent authority is satisfied at least 17% of the GFA will be used for non-residential purposes. The proposal seeks consent for shop top housing and the site in Zone MU1; therefore Clause 6.25 applies. There are no specific objectives identified for Clause 6.25; however, it can be inferred that it seeks to ensure that shop top housing provides a quantum of non-residential land uses.</p> <p>The proposal provides a total 4,213 sqm of non-residential GFA:</p>	<p><b>RTS Appendix G</b></p>

Submission	Applicant Response	Appendix Reference
<p>The SSDA is requested to be amended to comply with this requirement, which is critical to ensuring the precinct meets its employment targets and continues to function as a mixed use centre.</p>	<ul style="list-style-type: none"> <li>▪ Measured against the total GFA of the proposal of 39,014 sqm, the GFA for the non-residential component equates to 10.8% of the total maximum allowable GFA under the 'base' FSR development standard of the LEP (6:1).</li> <li>▪ Measured against the minimum non-residential GFA under the 'base' 6:1 FSR control, the 4,213 sqm non-residential GFA represents a minor shortfall of 167 sqm (0.65%).</li> </ul> <p>The requirement to provide non-residential floor space in strict compliance with Clause 6.25 (i.e. 17% of the total GFA) would compromise the capacity of the development to utilise the Housing SEPP uplift incentives to provide housing to meet the needs of very low, low, and moderate income households.</p> <p>The SSDA is accompanied by a revised Clause 4.6 variation request (non-residential FSR) (<b>RTS Appendix G</b>) to demonstrate that strict compliance with the minimum 17% non-residential GFA development standard under Clause 6.25 of the LEP is unreasonable and unnecessary in the circumstances of the SSDA proposal and that there are sufficient and positive environmental planning grounds to justify contravention.</p>	
<hr/> <p><b>Live/work apartment amenity</b></p> <hr/>		
<p>The upper level of each live/work studio should be residential only, with additional commercial floor space provided elsewhere within the development in order to achieve a minimum of 17% non-residential GFA.</p> <p>While Council is highly supportive of mixed use floor plates, the application as proposed does not adequately address the amenity needs of the various users and greater consideration should be given to the layout and configuration of the floors containing residential and non-residential uses.</p>	<p>The applicant has revised the design and configuration of the live / work units to provide a genuine approach of an upper-level residential suite at the top, and commercial suite at the bottom. The upper levels of the live / work units now provide for a residential use only, removing the commercial component at Level 1 and 4. However, 6 live / work units (now identified as retail / commercial units 01 – 06) have been replaced to retail / commercial uses only across both levels. The revised live / work configuration is as follows:</p> <ul style="list-style-type: none"> <li>▪ 4 units at levels 1 and 2 retain for commercial land use at the lower level and a residential use on the upper level.</li> <li>▪ 6 units at levels 1 and 2 provide for commercial land uses across both levels.</li> <li>▪ 14 units at levels 3 and 4 provide for commercial land use at the lower level and a residential use on the upper level.</li> </ul> <p>The revised design is detailed in the revised architectural drawings (<b>RTS Appendix D</b>).</p> <p>The removal of the commercial components at Level 01 and 04 results in benefits in terms of the operation, management, and security of the live / work units. These benefits are summarised as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>Improved amenity:</b> Public access to the non-residential floors and private residential access to the residential floor levels in the live/work units is clearly separated;</li> </ul>	<p><b>RTS Appendix D</b></p>

Submission	Applicant Response	Appendix Reference
	<ul style="list-style-type: none"> <li>▪ <b>Improved safety:</b> The clear separation of access between the commercial and residential components of the live / work units will alleviate concerns of safety and security for occupants and visitors; and</li> <li>▪ <b>Commercial local market oversupply:</b> The live / work units respond to the local market and prevailing economic conditions by providing an economically viable alternative to larger floorplate commercial uses.</li> </ul> <p>The conversion of 6 live / work units to commercial use, will assist in delivering non-residential land uses as required by Clause 6.25 of the LEP.</p> <p>The revisions to the live / work units reflect and are consistent with amendments made to the Regional DA during the Section 34 conciliation process. The amendments made to the Regional DA (which Council publicly exhibited between 6 May– 20 May 2025) reflect negotiations between the applicant and Council and resolution to contentions.</p>	
<p>It is unclear whether the shop-top housing within the live/work studios has been included in the ADG assessment of the residential component, particularly with regard to solar access, natural cross ventilation, private open space and internal storage.</p>	<p>The shop-top housing within the live/work studios has been included in the ADG assessment of the residential component. Refer to drawing DA001 Apartment Schedule which includes ADG compliance table for Level 1 &amp; 4, residential component of the live/work units.</p>	<p><b>RTS Appendix D</b></p>
<p>Car parking rates, loading / unloading and vehicle access</p>		
<p>The SSDA does not adequately assess consistency with the TfNSW Guide to Transport Impact Assessment (2024) intent and direction. In particular the impacts on the surrounding road network of proposed car parking significantly above Council's WDCP rates (reduced WDCP car parking rates being expected in the CBD Strategy and supporting traffic analysis).</p>	<p>The Transport Impact Assessment submitted with the original SSDA, has been prepared in accordance with guidance provided in the TfNSW Guide to Transport Impact Assessment (<b>GTIA</b>) document. An analysis of the existing and future road network has been conducted with consideration of current and projected road network conditions. Traffic modelling has been undertaken in full accordance with the GTIA, including the adoption of traffic generation rates for high density residential developments.</p> <p>It is important to note that the surveyed sites in the GTIA used to inform traffic generation estimates have an average car parking ratio of approximately 1.1 spaces per apartment. This car parking rate is largely consistent with that proposed for the subject site as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>GTIA car parking ratio:</b> 327 apartments x 1.1 car parking spaces = 359.7 car parking spaces.</li> <li>▪ <b>Proposed residential car parking rate:</b> 347 car parking spaces + 7 visitor car parking spaces = 359 car parking spaces.</li> </ul> <p>Therefore, the adopted methodology in the original Transport Impact Assessment is considered suitable and in line with TfNSW guidelines.</p> <p>TfNSW did not raise any concern with the approach taken with respect to traffic analysis, modelling or consistency with the GTIA in their submission on the SSDA.</p>	<p><b>EIS Appendix Y</b></p>

Submission	Applicant Response	Appendix Reference
<p>The SSDA is contrary to the land use and car parking strategic context (CBD Strategy and WDCP) which anticipated that the uplift in the Chatswood CBD would be accompanied by lower car parking rates as expressed in the WDCP. These rates are provided within Council's submission.</p>	<p>The minimum car parking requirement is prescribed as a non-discretionary development standard under Section 19(2)(e) and (f) of the Housing SEPP, which if complied with, prevents the consent authority from requiring more onerous standards.</p> <p>Specifically, Section 4.15(2) of the EP&amp;A Act states that if a DA complies with the non-discretionary development standards in an EPI, the consent authority:</p>	<p><b>EIS Appendix Y</b></p>
<p>In regards impacts on the surrounding road network, the site must not be taken in isolation and the approach to car parking in the SSDA should be considered in the wider context.</p>	<p><i>(a) is not entitled to take those standards into further consideration in determining the development application, and</i></p> <p><i>(b) must not refuse the application on the ground that the development does not comply with those standards, and</i></p>	
<p>The SSDA (being 390) exceeds Council's WDCP maximum car parking requirement (being 230) by 160 car spaces. The SSDA (being 390) exceeds Council's WDCP minimum car parking requirement (being 113.1) by 276.9 car spaces.</p>	<p><i>(c) must not impose a condition of consent that has the same, or substantially the same, effect as those standards but is more onerous than those standards, and the discretion of the consent authority under this section and section 4.16 is limited accordingly.</i></p>	
<p>Car parking has also been determined if non-affordable housing is based on WDCP, and affordable housing based on the Housing SEPP The SDA (390) exceeds non-affordable housing based on WDCP (maximum rate), and affordable housing based on the SEPP (combined total 219.5), by 170.5 car spaces. The SDA (390) exceeds non-affordable housing based on WDCP (minimum rate), and affordable housing based on the SEPP (combined total 138.05), by 251.95 car spaces.</p>	<p>Given the non-discretionary development standard provides a minimum car parking rate, the proposed car parking meets the controls in Section 19(e) and (f) of the Housing SEPP.</p> <p>The Proponent acknowledges Council's intent to encourage the use of public transport and reduce reliance of private vehicles. In this regard, it is expected that residents will be walking to access the local shops and services given the site's adjacent proximity to the Chatswood CBD and the Rail Station and Metro.</p> <p>Further, adequate car parking provision is required to cater to the travel needs of downsizers, aging owner-occupiers and young families as public transport does not meet all the travel needs of these residents, especially for destinations not well-served by public transport. It is also expected that the use of cars for recreational purposes will occur outside of peak periods and hence is unlikely to result in significant traffic generation.</p>	
<p>Council seeks an approach to car parking in the Chatswood CBD consistent with the significant and highly successful investment in Metro, rather than the approach that applies across NSW and outside metropolitan Sydney railway / transport precincts.</p>	<p>See response above. As established in the Transport Impact Assessment submitted with the original SSDA, the expected traffic generation arising from the proposal is relatively minor and can be accommodated on the surrounding road network.</p>	
<p>It is requested that in considering this SSDA, emphasis be placed on the applicable planning document providing the lowest rate for car parking in the Chatswood CBD railway precinct (which would be the WDCP).</p>		

Submission	Applicant Response	Appendix Reference
<p>The SSDA is requested to be amended to have car parking consistent with WDCP railway precinct car parking rates.</p>		
<p>Concerns are raised in regards the location of the loading dock immediately after entering Basement 1. In Council's view the location of the loading dock is not appropriate but rather forced, and leads to a number of issues, including:</p> <ul style="list-style-type: none"> <li>- At the bottom of the ramp, from O'Brien Street to Basement 1, all vehicle movement into and from the site, including all residential and non-residential cars, is blocked while vehicles manoeuvre into the dock.</li> <li>- All waste for the main loading dock is required to be moved from waste rooms across the main basement vehicle aisle where the O'Brien Street ramp enters Basement 1 (which all vehicles use), to the rear of the waste vehicle in the loading dock which is located towards a wall, as vehicles are required to reverse in.</li> </ul>	<p>The project Transport Consultant (<b>JMT</b>) have advised it is a common arrangement for loading docks to be located close to the base of the vehicular ramps in order to minimise conflicts with general traffic in the car park.</p> <p>The proposed arrangements minimise the travel distance required for trucks and therefore limit the extent of conflicts with general traffic.</p> <p>While waste collection and other delivery vehicles are infrequent and typically occur outside of busy periods the following measures will be implemented to further mitigate risks of conflicts between waste trucks and building users:</p> <ul style="list-style-type: none"> <li>▪ Installing convex mirrors at the basement level to provide directional sight lines between vehicles driving up the Basement 2 ramp and vehicles entering the building from ground level.</li> <li>▪ Installing a warning signal (e.g. flashing lights or similar) adjacent to the ground floor waste area which is triggered by heavy vehicles (including waste vehicles) travelling down the ramp from ground level. This is to make residents and visitors aware of the possibility of a vehicle entering at the same time they are departing.</li> <li>▪ Billbergia to provide details to residents of waste collection days and typical times so that residents are aware of times that waste trucks are likely to be on site.</li> <li>▪ Trucks to utilise reversing lights / beepers.</li> </ul> <p>The Architectural Plans have been updated to relocate the residential waste holding room adjacent to the loading dock. Bins can now be collected at the rear of the loading bay and do not have to be transported across the main traffic aisle.</p>	<p><b>RTS Appendix D</b></p>
<p>In Council's view, car parking should be reduced, with a more logical loading dock identified on the western side of the internal Basement 1 vehicle movement aisle, closer to bins rooms. The correct location of the loading dock serving 10.5m vehicles, including Council waste vehicle, is critical to the successful functioning of vehicle movement on-site and within basement levels.</p>	<p>The layout of the loading dock makes provision for Council's 10.5m long truck with a 2m clearance at the rear of the vehicle.</p>	<p><b>N/A</b></p>
<p>It is unclear what the TfNSW position is regarding O'Brien Street access for a potential development involving 120.5m height and 8.46:1 FSR, and whether Wilson Street is a more appropriate</p>	<p>TfNSW has provided comments and recommended conditions for the consideration of DPHI in its assessment of the SSDA (dated 2 May 2025). TfNSW provide the following comments regarding the proposed vehicle access arrangements at O'Brien Street:</p>	<p><b>N/A</b></p>

Submission	Applicant Response	Appendix Reference
<p>location. Clarification is required as part of the current exhibition process, with input from TfNSW.</p>	<ul style="list-style-type: none"> <li>▪ <i>“Given the obscured geometry of this intersection, motorists will have to cross two lanes of traffic to make somewhat of a semi U-turn manoeuvre to join the queue on Railway Street in order to turn left/right onto the Pacific Highway which has safety and network efficiency issues due to the higher trips that will be generated by the proposed development.</i></li> <li>▪ <i>As such, measures need to be identified to restrict manoeuvres from O’Brien St to left in left out only.”</i></li> </ul> <p>The applicant acknowledges TfNSW’s comments and accepts the proposed vehicle access arrangements to restrict manoeuvres from O’Brien Street to left-in left-out.</p> <p>Additionally, the applicant is prepared to install a 12m long median strip to Railway Street at the junction of Railway Street, O’Brien Street and Pacific Highway to enforce the left in / left out of O’Brien Street and ensure safety at this intersection.</p>	
<p><b>Greening of the site at ground level</b></p>		
<p>Concern is raised with the lack of ground level greening to Pacific Highway, O’Brien Street, and the minimal deep soil planting. It is also considered that increased greening to Wilson Street and the setback to the North Shore Rail Line is possible.</p>	<p>The Landscape Plans have been updated to provide additional greening along Pacific Highway and O’Brien St. The additional greening includes new tree plantings at the pocket park and low raised planters adjacent to the retail showrooms.</p>	<p><b>RTS Appendix J</b></p>
<p>The greening of the site is addressed below in SP2 land implications for SSDA Pacific Highway frontage, Ground level setbacks, Nature of ground level setbacks, Public domain and public benefit, Deep soil planting and in Open space comments.</p>	<p>The updated Landscape Plans and Architectural Plans identify a deep soil provision of:</p> <ul style="list-style-type: none"> <li>▪ <b>Including the SP2 zoned land:</b> 504.5 sqm (10.6% of the site area)</li> <li>▪ <b>Excluding the SP2 zoned land:</b> 303.5 sqm (7.1% of the site area)</li> </ul>	<p><b>RTS Appendix J</b></p>
<p><b>SP2 land implications for SSDA Pacific Highway frontage</b></p>		
<p>In Council’s view, the treatment of the Pacific Highway frontage is of major importance to the redevelopment of this site, noting the high visibility to the Pacific Highway, Railway Street as well as Wilson Street – and the future overall vision for the Pacific Highway. There remains uncertainty over where the boundary will be and the subsequent design. Any clarification provided by TfNSW and subsequent redesign responding to this submission, requires further consideration by Council. If TfNSW does not require the identified SP2 land, or only part of it, Council is supportive of this space</p>	<p>As stated in the EIS, whilst the SP2 Infrastructure (Classified Road) land is included in the land to which the SSDA relates, the land is devoid of any built form or structures. The proposed development does not rely upon SP2 zoned land to achieve compliance with any planning or design controls, for instance in relation to the LEP or the ADG. For the purposes of assessing the SSDA against relevant planning considerations, the development site comprises the land zoned MU1 (Mixed Use).</p> <p>Clause 5.1A of the LEP applies to the SP2 zoned land (as a “Classified Road”). Clause 5.1A(3) provides that development consent must not be granted to any development other than development for the purpose of a “road”. Pursuant to the Land Use table in Part 2 of the LEP, development within the SP2 Zone that is “ordinarily incidental or ancillary to development for that purpose (i.e. the road)” is permitted with consent. The proposal</p>	<p><b>N/A</b></p>

Submission	Applicant Response	Appendix Reference
<p>contributing to soft landscaping, tree canopy tree planting, a pocket park and the shared pedestrian and bicycle path.</p> <p>If TfNSW is unable to confirm that it no longer requires the identified SP2 land, redesign is required to ensure the relevant active transport infrastructure and soft landscaping is still provided on the MU1 zoned part of the site.</p>	<p>provides additional landscaping elements within the SP2 zone to complement the landscaping and public domain elements delivered on the site (being the land zoned MU1). The inclusion of the SP2 zone into the scope of the SSDA allows the proposal to deliver additional soft landscaping, canopy trees, and seating areas beyond what would otherwise be provided if the development site was exclusively the MU1 zoned land.</p> <p>Consistent with the Land Use table in Part 2 of the LEP, these additional landscape elements are considered “ancillary to development for the purpose of the road” and permitted with consent. [If an alternative interpretation is taken that these landscape elements were not in fact “ancillary” or “incidental” to a road, all these landscaped elements would have to be removed from the scope of the proposed development].</p> <p>In effect, these additional landscape elements provide an “interim” solution until such time that the land is compulsorily acquired by the relevant authority for future road widening works. It is evident that this “interim” solution provides a significantly enhanced public domain outcome as opposed to separating the SP2 land from the development site (being the MU1 zoned land) and leaving it undeveloped until such time as it is compulsorily acquired by the relevant authority. The “interim” solution improves the amenity, appearance, and environmental conditions of the pedestrian interface to Pacific Highway.</p> <p><b>Critically, the SP2 zoned land is not included in the development area for the purposes of assessing compliance with any planning or design numerical controls (for instance in relation to setbacks, soil zone areas, soft landscaping etc).</b></p> <p>In December 2023 the applicant received correspondence from TfNSW advising that the proposed road widening envisaged by the SP2 zoning had been reduced. Specifically, TfNSW indicated that the land to be compulsorily acquired will be reduced from 457 sqm (as per the existing SP2 zoning) to 190 sqm. Accordingly, some 267 sqm of land currently zoned SP2 will not be compulsorily acquired by TfNSW and can instead be maintained as an additional landscaped area.</p> <p>Further to the correspondence from TfNSW in December 2023, TfNSW’s submission to the SSDA (dated 2 May 2025) states the following regarding the SP2 Zoned land:</p> <p><i>“TfNSW advises that the property is located within an area under investigation for a future road proposal. Its investigations have not yet advanced to the stage where options have been defined, and accordingly, it is not possible at this time to identify if any part of the subject land will be required to accommodate this proposal (i.e. a lesser portion of land that is currently identified as SP2 may be required). TfNSW, at this time, has no committed funding for any works along this section of the Pacific Highway.”</i></p>	
<hr/> <p><b>Ground level setbacks</b></p> <hr/>		

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<p>Numerically ground level setbacks are provided consistent with WDCP Part L: Placed Based Plans, Section 13.1.15 requirements.</p> <p>However, the treatment of these setback areas is not consistent with WDCP Part L: Placed Based Plans, Section 13.1.15 requirements – and is addressed below.</p> <p>Importantly, Council is not just concerned about meeting numerical requirements but rather the location of soft landscaping in locations that make a difference and provide amenity (e.g. providing tree canopy, being visible and available for users of publicly accessible ground level setbacks for the purposes of providing passive rest areas or relief from a dense urban environment the subject of significant uplift).</p>	<p>The Landscape Plans have been prepared in accordance with the requirements outlined in Part L, Section 13.1.15 of the DCP. The Landscaping Strategy provides for deep soil areas (303.5sqm), landscaping (629sqm), and public open space at Ground Level.</p> <p>Significant streets are provided along the street frontages and rail line where possible. Large tree planting have been avoided in areas where they present a safety hazard (i.e. blocking visibility of cars turning into Railway Street or Pacific Highway).</p> <p>The proposal provides a high-quality landscape design that seeks to improve the amenity and appearance of the pedestrian environment, by integrating the landscaping and public domain strategy.</p> <p>Additional greenery has been incorporated into this revised SSDA package, further enhancing the network of greenery.</p>	<p><b>RTS Appendix J</b></p>
<p><b>Nature of ground level setbacks and other open space issues</b></p>		
<p>The SSDA is requested to be amended to show:</p>		
<p>All ground level soft landscaping is to be consistent with this submission and dimensioned (including areas).</p>	<p>The Architectural Plans and Landscaping Plans have been updated to confirm 629sqm of soft landscaping is provided at the Ground Level (14.6% of the site area).</p>	<p><b>RTS Appendix D</b> <b>RTS Appendix J</b></p>
<p>In regards the Pacific Highway setback, increased soft landscaping / greening is required on the 4m setback on MU1 zoned land. Canopy trees are to be provided in this setback, facilitated by deep soil planting (addressed below).</p>	<p>The applicant's ownership of the SP2 zoned land provides an opportunity for additional areas of landscaping and tree planting to Pacific Highway, in excess of the 'compliant' ground level setback areas. These areas are in addition to the development site and contribute additional ground level setbacks and an enhanced public realm.</p> <p>201sqm of deep soil area is provided along the Pacific Highway frontage (within the SP2 zoned land). Additional tree plantings have been provided within the deep soil areas in the revised submission.</p> <p>Low raised planters have been incorporated into the 4m setback adjacent to the retail showrooms.</p>	<p><b>RTS Appendix J</b></p>
<p>The pocket park (achieved via WDCP setback as outlined above) is located on the O'Brien Street and Pacific Highway corner, within the SP2 future road widening area, and therefore would be removed during the TfNSW road widening.</p>	<p>The proposal is generally consistent with the relevant DCP Controls as follows:</p> <ul style="list-style-type: none"> <li>▪ Open spaces at ground level act as publicly accessible open spaces.</li> <li>▪ 70 new tree plantings are proposed within the site and along the street frontage.</li> </ul>	<p><b>RTS Appendix J</b></p>

Submission	Applicant Response	Appendix Reference
<p>Council seeks for a pocket park to be located on the MU1 zoned part of the site, consistent with the intention of achieving a green gateway to Railway Street and the western side of the CBD.</p>	<ul style="list-style-type: none"> <li>▪ Public domain improvements are provided to all street frontages.</li> <li>▪ The proposal provides 1,399 sqm soft landscaping (32.5% of site area).</li> <li>▪ The proposal provides 303.5 sqm deep soil zone (7.1% of site area). Deep soil zones are provided along the frontages to O'Brien Street and the pocket park.</li> </ul> <p>The pocket park is maintained in its current location at the south-west corner of the site, complimented by a spacious landscaped refuge. The pocket park forms part of the public space strategy, and its location ensures accessibility and use by pedestrians passing by. The pocket park activates the Pacific Highway and O'Brien Street frontages and compliments the landscaped character of the area.</p>	
<p>Unobstructed access to the south from the rear external through site link (in the setback to the North Shore Rail Line) is to be provided.</p>	<p>The Landscape Plans provide unobstructed access to the south from the rear external through site link.</p>	<p><b>RTS Appendix J</b></p>
<p>The proponent is requested to reduce hard paved areas in the setback to the North Shore Rail Line, while maintaining the through site link, and increase soft landscaping to create passive rest areas and facilitate provision of tree canopy.</p>	<p>The hard paved areas in the rear through site link have been designed to follow the dimensions of 'Easement D' that applies to the property. Easement D, in favour of Transport Asset Holding Entity (Sydney Rail), requires an easement for access is provided, 3 meters wide, to maintain full access to the easement. Reducing the hard paved areas and substituting with additional landscaping would obstruct access to this easement and therefore result in a non-compliance with the terms of 'Easement D.'</p> <p>The tree and planting species at this location has been deliberately chosen to maintain clearance from the easement zone and ensure a low risk of trees falling into the rail corridor.</p> <p>The rear through site link provides for seating / passive areas and accessible ramps to provide DDA access routes. Removal of these ramps would necessitate the implementation of a lift at this location.</p>	<p><b>RTS Appendix J</b></p>
<p>The proponent is requested to create a more meaningful green landscape presence on the Wilson Street frontage, as a minimal presence is currently proposed.</p>	<p>Additional landscaping has been provided along Wilson Street where possible. The additional landscaping includes street trees, trees adjacent to the retail showroom and a soft landscaped area adjacent to residential Building B.</p>	<p><b>RTS Appendix J</b></p>
<p>A commitment from the proponent that street tree planting, which is in addition to on-site planting, will be provided to the Pacific Highway, O'Brien Street and Wilson Street. In addition, Council seeks a street tree planting plan that would be conditioned in any approval.</p>	<p>The Landscape Plans include planting plans of all proposed trees including street trees. The proposed street tree planting includes –</p> <ul style="list-style-type: none"> <li>▪ 5 x Pyrus Calleryana 'Capital along Wilson Street</li> <li>▪ 6 x Tristaniopsis 'Luscious along to O'Brien Street</li> <li>▪ 2 x Eucalyptus microcorys along Pacific Highway</li> </ul>	<p><b>RTS Appendix J</b></p>

Submission	Applicant Response	Appendix Reference
	The street tree selection is in accordance with Council's preferred species.	
A commitment from the proponent that the undergrounding of cables serving the site will be fully realised. In addition, Council seeks for this outcome to be reinforced by condition in any approval.	Noted.	N/A
<b>Public domain and public benefit</b>		
The SSDA is requested to be amended to show: Confirmation of the ground level areas to be subject to public rights of way. Areas subject to public rights of way are to be free of obstruction, with the only exceptions being green planting and reasonable / minimised paved areas or steps to access the site.	The primary external through site link at the eastern boundary of the site is already enforced via an existing easement. The terms of this easement mandate a 3m wide access corridor be provided allowing 24/7 unimpeded access.  In regard to the internal through site links (ancillary to the primary through site link) a right of way/easement or similar is not considered to be required. The design sufficiently allows for multiple points of access to the general public.	N/A
<b>Deep soil planting</b>		
The SSDA is requested to be amended to show deep soil planting as follows: Basements setback from the Pacific Highway front boundary after TfNSW land acquisition – being where the Pacific Highway meets the on-site MU1 zone land. Basements set back from O'Brien Street. Further basement setback is requested for at last part of the rear setback to the North Shore Rail Line to facilitate significant canopy tree planting. The reduction in basement size is consistent with Council's request for reduced car parking provision.	The proposal exceeds the minimum deep soil requirement under the ADG, therefore further setbacks to provide additional deep soil is not required.  As mentioned, significant tree plantings have been avoided at the rear through site link / boundary with the rail corridor as it presents a fall risk to the rail track and would not be supported by Sydney Trains.	N/A
<b>Tower setbacks</b>		
Encroachments into tower setbacks at significant heights are not supported by Council, with the impact of the encroachments magnified at the height proposed. A 6m tower setback is required for a total height of 120.5m. The setbacks provided in WDCP, Part L: Placed Based Plans, Section 13.1.4, 15 represent the desired future built form on-site, responding to the	The proposal remains consistent with the competition scheme. The architectural form achieves high amenity with the necessary apartment / balcony depth, whilst maximising activation of O'Brien and Wilson Street.  The current setback allows adequate apartment layouts and sizes. The tower remains setback from podium below without compromising slenderness and tower appearance.	RTS Appendix D

Submission	Applicant Response	Appendix Reference
<p>significant uplift under WLEP 2012 – with slender towers contributing to spatial separation and the envisioned liveability of the CBD.</p>		
<p><b>8. Affordable housing</b></p>		
<p>In providing 4% affordable housing contribution in accordance with WLEP 2012 Clause 6.8, it is noted that a monetary contribution is proposed. Built affordable housing contributions required under WLEP 2012 are provided to Council in perpetuity. The proponent is requested to provide affordable housing in this manner. Any temporary Affordable Housing provided for the purposes of the SEPP bonus provisions, should be in addition to the Affordable Housing contributions required under Council's LEP.</p>	<p>Clause 6.8 of the LEP outlines the affordable housing contributions which apply to the land. The rate that is applied to the site is 4% of the total residential GFA (excluding the 15% Housing SEPP uplift). This contribution can either be made in kind with a dedication, in favour of the Council, of land comprising 1 or more dwellings, each having a gross floor area of at least 50 sqm, or the equivalent monetary contribution. The applicant intends to satisfy the requirement of Clause 6.8 via a monetary contribution to satisfy the relevant condition of development consent.</p>	<p>N/A</p>
<p>The infill affordable housing bonuses were not intended to replace existing affordable housing requirements and this was clearly communicated throughout the exhibition and finalisation of the SEPP. The SSDA should satisfactorily address s 7.32 (3) (a) of the Environmental Planning and Assessment Act 1979 and s 15 of the SEPP (Housing) 2021, and s 7.32 (1) and (3) (c) of the Environmental Planning and Assessment Act 1979, in regards the affordable housing proposed (both in regards WLEP 2012 and the SEPP).</p>	<p>The proposal provides 59 x affordable rental apartments, equating to 5,852 sqm (15% of the total GFA).</p> <p>The provision of affordable rental housing in a key strategic area of Sydney with rising demand, represents a significant public benefit. The proposal provides a diverse mix of affordable housing typologies, including one-bedroom, two-bedroom, and three-bedroom units located on Levels 05 – 11.</p>	<p>N/A</p>
<p><b>9. Infrastructure provision</b></p>		
<p>This site was rezoned with an associated voluntary planning agreement put in place to ensure that the local infrastructure required to support the future residents of the site can be adequately serviced. It is critical that this approval retains the agreed infrastructure contributions under the voluntary planning agreement.</p>	<p>Noted. Section 2.4 of the EIS outlines the developer obligations for the payment of monetary contributions in accordance with the VPA. The monetary contributions will be paid in staged instalments as required by the VPA.</p>	<p>N/A.</p>

Submission	Applicant Response	Appendix Reference
<p>Having regard to any final decision on this matter, standard VPA, s7.11 and s7.12 conditions are provided at Attachment 3 of Council's submission.</p>	<p>The applicant has reviewed the draft conditions of consent and responds as follows:</p> <ul style="list-style-type: none"> <li>▪ <b>Condition 1: Affordable Housing:</b> The applicant accepts that Clause 6.8 of the LEP applies to the proposal. Interpreted literally, Clause 6.8(5) would mean that all residential GFA, including the 15% affordable housing provided under the Housing SEPP, is included in the 4% calculation. The applicant submits that the 4% should <u>exclude</u> the affordable housing GFA provided under the Housing SEPP (5,841 sqm). This is consistent with the Housing SEPP and DPHI's accompanying <i>In-fill Affordable Housing Practice Note</i> (December 2023) which make it evident that the intent of the State policy is to facilitate additional affordable housing separate to any local affordable housing that may be required under a local EPI (in this instance the LEP).</li> <li>▪ <b>Condition 5: S7.11 Contribution:</b> The applicant accepts that a Section 7.11 <u>or</u> Section 7.12 contribution will apply (whichever yields the greater amount).</li> <li>▪ <b>Condition 6: S7.12 contribution:</b> The applicant accepts that a Section 7.11 <u>or</u> Section 7.12 contribution will apply (whichever yields the greater amount).</li> <li>▪ <b>Condition 7: Planning Agreement:</b> The applicant accepts that the terms of the VPA (as executed) will need to be satisfied, including payment instalments and timings.</li> </ul>	<p>N/A</p>
<p><b>10. Public art</b></p>		
<p>In Council's view, what is proposed in the SSDA is uncertain, with the proponent seemingly adopting a public art approach focused on the building / site with the details to be determined in the future. On this basis it is concluded that the SSDA does not provide any certainty for public art provision, particularly in a manner consistent with Council's Public Art Policy.</p> <p>No public art contribution is proposed.</p> <p>Council is seeking a public art component consistent with the Willoughby Public Art Policy, noting that it would be Council's decision whether any public art contribution would be appropriate on-site or whether a contribution towards another location would be of greater public benefit. This decision would be made having regard to the details of any offer made.</p>	<p>PBD have prepared a Public Art Strategy which identifies opportunities for integration of Design for Country principals into the Public Art. The public art provision will be developed throughout the detailed design stage in consultation with a specialist Indigenous design consultant and other stakeholders as required.</p> <p>The Strategy identifies four potential locations for public art which will be further refined in consultation with the commissioned artist.</p> <p>Public Art will be in accordance with the Willoughby Council's Public Art Strategy and will Integrate Design for Country Principals.</p>	<p>RTS Appendix V</p>
<p><b>11. Building Sustainability</b></p>		

Submission	Applicant Response	Appendix Reference
<p>The proposed SSDA has not provided certainty, making reference to targeting, rather than committing to the expected minimum 5 star GBCA rating or the equivalent as the minimum sustainable building outcome for this site.</p> <p>The site specific DCP for 849, 853, 859 Pacific Highway and 2-8 Wilson Street, Chatswood states: A minimum of 5 stars GBCA building rating is expected. A higher rating is encouraged. Council considers a 5 star GBCA rating or the equivalent the minimum sustainable building outcome on this site. If any approval is to be given regarding this SSDA, a condition should be included requiring a 5 star GBCA rating or the equivalent for the development.</p>	<p>The ESD Report submitted with the EIS details the sustainability principles incorporated into the proposal and summarises the BASIX and thermal comfort aspects. The requirement to meet a 5 stars GBCA building rating is not a statutory requirement.</p>	<p><b>N/A</b></p>
<p><b>12. Requested further amendments or information</b></p>		
<p><u>Open space comments</u></p>		
<p>Underlying plan used for Arboricultural Impact Assessment (AIA) (dated 5/11/2024 prepared by McArdle Arboricultural Consultancy) is not consistent with the proposed Ground Floor Plan and Landscape Plan. There are a number of trees indicated for retention that would incur a major encroachment and not considered to be retainable on the proposed Ground Floor Plan and Landscape Plan.</p>	<p>The Arborist Report (<b>RTS Appendix H</b>) has been updated to revise the numbers of trees proposed for removal and retention. The updated Report identifies that 7 trees are proposed for removal and 12 trees are to be retained. This is consistent with the Ground Floor Plan and Landscape Plan.</p>	<p><b>RTS Appendix H</b> <b>RTS Appendix J</b></p>
<p>Trees within paving area: T20 (group of 7; <i>Acmena smithii</i> hedge), T35, T66 (group of 4; <i>Murraya paniculata</i> hedge), T67, T70, T77 (street tree).</p>	<p>Trees T20, T35, T66, T67 and T70 are now proposed to be removed and replenished.</p> <p>Tree T77 is to be retained, and tree protection / sensitive construction measures will be implemented to protect this tree during the construction stage – refer to the updated Arborist Report for further detail.</p>	<p><b>RTS Appendix H</b></p>
<p>Trees being retained with major encroachments not addressed in arborist's report: T68, T72, T76, T77 and T78.</p>	<p>Trees T68 and T72 are now proposed to be removed and replenished.</p> <p>Trees T76, T77 and T78 are to be retained, and tree protection / sensitive construction measures will be implemented to protect these trees during the construction stage – refer to the updated Arborist Report for further detail.</p>	<p><b>RTS Appendix H</b></p>

Submission	Applicant Response	Appendix Reference
<p>If the trees are to be retained sufficient evidence is to be provided to demonstrate the trees will be capable of surviving the impacts of the development. If the trees require removal it shall be clearly indicated on the plans.</p> <p>If removal is proposed, replacement with large canopy trees should be provided within the pocket park area.</p>	<p>As above. The updated Arborist Report clearly identifies 7 trees for removal and 12 trees for retention. The trees proposed for removal will be replenished elsewhere on the site. The pocket park area includes native trees plantings, however large canopy trees are not possible at this location due to the sightlines required for vehicle manoeuvres at the O'Brien Street / Pacific Highway intersection.</p>	<p><b>RTS Appendix H</b> <b>RTS Appendix J</b></p>
<p>Site plan should be consistent with Landscape plans and arborist report with regard to existing trees for removal, retention or transplanting.</p>	<p>The Site Plan, Landscape Plan and Arborist Report are consistent in identifying the trees proposed for removal.</p>	<p><b>RTS Appendix J</b> <b>RTS Appendix H</b> <b>RTS Appendix D</b></p>
<p>Trees already approved for removal Demolition DA (DA-2023/19) was approved with the 45 trees indicated for removal on the Ground Floor - Landscape Plan. A bond payment for required replacement tree planting was conditioned to ensure replacement planting at 3:1 could occur on future development of the site.</p> <p>Additional trees for removal It is expected this application will require the removal of up to 17 additional trees to accommodate the proposal in its current form.</p> <p>Additional tree removals shall require replacement at 3:1 in accordance with the DCP. As the number of replacement trees required from demolition already exceeds the number of replacement trees provided on the plans, the additional required tree replacements are to be paid for under the Offset Planting Scheme.</p>	<p>As above. The original SSD application (as lodged) sought to retain 25 trees and remove and replenish 43 trees. However, some of the trees identified for removal in the SSD overlapped with those already approved for removal under the separate Demolition DA (DA-2024/19) (approved in December 2024). The SSDA now proposes the removal of 7 trees within the site to facilitate the proposed development.</p> <p>The Landscape Strategy proposes 35 native trees of various canopy sizes to the ground-floor where possible to increase and maximise tree canopy cover. The proposal provides a total canopy coverage of 865sqm (21% of the site area). Therefore, the proposal meets the 3:1 tree replacement requirement.</p>	<p><b>RTS Appendix J</b></p>
<p>Replacement canopy tree species 69% of the proposed replacement trees are tree ferns, and 15% are palm trees. The proposed removal of a large number of trees to be replaced with immature tree ferns trees does not meet the objectives of Part G of the WDCP in mitigating heat loss.</p> <p>Palm species and some tree ferns may be acceptable, given then number or required</p>	<p>The Landscape Plans have been updated to show –</p> <ul style="list-style-type: none"> <li>▪ All palm trees have been replaced with native canopy tree species - <i>Corymbia citridora</i> [15x7m] / <i>Eucalyptus racemosa</i> [15x6m]</li> <li>▪ Add additional canopy trees across the street frontages</li> <li>▪ Increase pot sizes of considered tree ferns within planting schedule to be 'ex ground' or mature.</li> </ul>	<p><b>RTS Appendix J</b></p>

Submission	Applicant Response	Appendix Reference
<p>replacement trees, however, they should not be the majority of the canopy replacement species. Where use as replacement trees, tree ferns should be planted in more advanced sizes. The planting schedule indicates 300mm pot size for tree ferns. Potentially taking over 20+ years to reach a height of 4m.</p> <p>A greater proportion of replacement trees are to be broad canopy trees which contribute to the tree canopy to help mitigate urban heat through shading and evapotranspiration.</p>		
<p>ii. Wind mitigation planting</p> <p>The wind assessment notes that dense planting is required as part of the wind mitigation measures to upper levels.</p> <p>Level 03 planting includes mostly ground covers and grasses, with a few shrubs with potential to achieve up to 1m in height. The Environmental Wind Tunnel Study required indicates trees are required to the level 3 planter. The Level 03: Landscape Plan indicates a planter depth of 600mm, which would be insufficient to support trees.</p> <p>Planting to the end of the breezeway corridors consists of grasses and ground cover planting, with only some planters indicating just one shrub capable of achieving a height of 1m in more ideal conditions. This would not achieve “dense planting” in line with the Environmental Wind Tunnel Study requirements.</p>	<p>The proposal has been amended to enclose the breezeways. The original design for the breezeways was to allow natural light and airflow and create a bright and inviting environment fostering a sense of openness and connection for residents. The intent of the breezeways was to enhance the living experience and support sustainable design principles, specifically providing ventilation to the mechanical plant rooms and air-conditioning condenser units. Landscaping features and horizontal louvres would mitigate wind impact and create a comfortable and pleasant corridor for future residents.</p> <p>The amendment to enclose the horizontal corridors provides consistency with amended documentation submitted to Council for the Regional DA (DA-2024/47). The Schedule of Design Revisions noted in <b>Appendix X</b> identify the scope of amendments to the SSDA which reflect and are consistent with amendments made to the Regional DA during the Section 34 conciliation process. The amendments made to the Regional DA (which Council publicly exhibited between 6 May– 20 May 2025) reflect negotiations between the applicant and Council and resolution to contentions.</p> <p>As a direct consequence enclosing the horizontal corridors, these spaces are included in the calculation of GFA as they are within the external walls of the building. Enclosing these spaces will remove potential wind and weather effects on the amenity of residents. Whilst breezeways have some environment performance benefits in terms of reduced reliance on mechanical air conditioning, the enclosed horizontal corridors creates amenity benefits. The additional GFA is assessed in the Clause 4.6 variation request (FSR) at <b>RTS Appendix E</b>.</p>	<p><b>RTS Appendix E</b></p>
<p>iii. Basix landscape requirements</p> <p>The BASIX certificate shows a requirement for 371m<sup>2</sup> of indigenous low water use planting in common area landscape. The area of landscaping to comply with this requirement has not been clearly identified on the plans.</p>	<p>The Landscape Plans have been updated to provide 382sqm of low water use planting. The low water use planting area is identified on the Ground Floor Landscape Plan (Page 9 of <b>RTS Appendix J</b>).</p>	<p><b>RTS Appendix J</b></p>

Submission	Applicant Response	Appendix Reference
<b>Engineering comments</b>		
<u>Stormwater and Flooding</u>		
<p>The site is not flood affected. However, there is a flood path in O'Brien St fronting the site. In order to ensure that flooding in the street does not affect the development, the proposed floor level for the site needs to comply with the Flood Planning Level and the entry to the basement needs to be at a level that prevents overflow from the street into the basement.</p>	<p>The project engineer (Xavier Knight) has further investigated the flood conditions throughout the Regional DA process. The updated Civil Engineering Design Report includes Stormwater drainage design drawings, which were prepared in consultation with Council. The additional investigations concludes that the PMF level is at RL103.49.</p> <p>The flow path is not major, and the crest of the driveway is at the PMF level. The proposed 230mm freeboard in the 1%AEP event which Council has noted is acceptable in this instance.</p> <p>Furthermore, all habitable floor levels meet the flood planning level requirement of 1% AEP level + 500mm freeboard.</p> <p>The Civil Plans have been updated to show that the FFL for Residential Lobby A has been amended to RL 103.76 and is now compliant with flood planning level requirements (Refer drawing C100).</p>	<p><b>RTS Appendix W</b></p>
<p>The Civil Report submitted with the SSD application details that the 1%AEP water level at the low point in O'Brien Street is RL103.26. For new buildings, a 500mm freeboard is required, giving a minimum floor level of RL103.76m. The proposed floor level in the building adjacent to O'Brien St is 103.70m, which is lower than the flood planning level.</p>	<p>The Civil Plans have been updated to show that the FFL for Residential Lobby A has been amended to RL 103.76 and is now compliant with flood planning level requirements (Refer drawing C100).</p>	<p><b>RTS Appendix W</b></p>
<p>To protect the basement from overland flow in O'Brien Street, a crest is required on all access points to the basement. To comply with Technical Standard 2, the crest height needs to be the higher of the 1%AEP water level + 500mm or the PMF level, whichever is higher. The Civil Report submitted did not include details of the PMF at the site.</p>	<p>The Civil Report has been updated to reflect additional flood investigations undertaken as part of the Regional DA. As per Council's comment below, the basement crest level has been set at the PMF level at RL103.49. The Architectural Plans have also been updated to reflect this.</p>	<p><b>RTS Appendix W</b> <b>RTS Appendix D</b></p>
<p>The proposed crest level on the access to the basement parking area is 103.49m, which meets the requirement to be at the PMF level. However, it does not meet the requirement to be at the 1%AEP + 500mm level of 103.76m. The proposed crest level has a freeboard of 230mm in the 1%AEP event. As the flow path is not major and the crest of the</p>	<p>Noted.</p>	<p>N/A</p>

Submission	Applicant Response	Appendix Reference
<p>driveway is at the PMF level, the proposed 230mm freeboard in the 1%AEP is acceptable in this instance.</p>		
<p>The stormwater drainage plans have not demonstrated compliance with Part I of the Willoughby DCP and Technical Standard 1. Of concern is the secondary OSD basin and the level of the basin.</p>	<p>The Permissible Site Discharge (<b>PSD</b>) for the site is calculated at a max. of 73 L/s up to the 1% AEP storm event. A catchment breakdown and PSD calculations have been provided in Civil drawings submitted with the original SSDA submission (drawing no. C200 and C201).</p> <p>Due to the existing topography of the site draining from North to South, it is not possible to comply with PSD requirements if the OSD Basin is relocated further upstream or at a higher level. This is because additional flows will then bypass the Basin and PSD requirements will not be met.</p> <p>The Project Civil Consultant has discussed this matter with Council's Drainage Lead. Given the site specific constraints, the proposed design including a Basin with a drowned orifice has been submitted to Council to review from a merit based approach.</p> <p>Furthermore, the benefits of the OSD Basin in the current location are:</p> <ul style="list-style-type: none"> <li>▪ Acts as flood storage in excess of the 1% AEP event and therefore improving PMF flood conditions;</li> <li>▪ Open and easy to maintain;</li> <li>▪ Allows for better sedimentation and pollutant removal from flows from the site; and</li> <li>▪ Maximum possible area of the site is diverted to detention systems for water quality treatment and quantity control.</li> </ul>	<p><b>RTS Appendix W</b></p>
<p>In accordance with Clause 6.2.o of Technical Standard 1, the outlet of the OSD system must be above the downstream 1%AEP water level, to ensure that the outlet operates as designed and to prevent backflow from the street into the system. The outlet of the secondary basin is at RL 102.50m and the base of the basin at RL 103.05 – 103.08, both of which are below the 1%AEP water level of 103.26m. This is not acceptable to Council and the secondary basin needs to be redesigned / relocated such that compliance with this item is achieved.</p>	<p>As per response above.</p> <p>The Civil Plans have been updated (drawing C201) to show non-return flap-valve at the OSD Basin outlet pipe to prevent potential issues with backflow of street drainage into the system.</p>	<p><b>RTS Appendix W</b></p>
<p>We note that the applicant has provided information to demonstrate that the OSD system will comply with the permitted site discharge requirements, even when the outlet is below the downstream water level. However, the requirement for the outlet to be above</p>	<p>To ensure the OSD Basin is not affected by downstream Top Water Level (<b>TWL</b>) conditions and to reduce the risk of contamination, a non-return flap valve has been included on the Civil Plans at the proposed basin's outlet pipe location.</p>	<p><b>RTS Appendix W</b></p>

Submission	Applicant Response	Appendix Reference
<p>the downstream water level is not solely due to the impact on peak outflow. There are also potential issues with backflow of street drainage into the system and maintenance.</p>		
<p><u>Vehicle access and parking</u></p>		
<p>The Waste Vehicle / HRV loading bay requires a complex set of manoeuvres for vehicles to enter and exit the bay. For a vehicle entering the site, they need to go past the bay, and then reverse into the bay, similar to a parallel park. The reversing manoeuvre needs to occur across the main vehicle access into the site. When leaving the bay, the vehicle needs to undertake a 3 point turn, which also occurs within the main vehicle access point, blocking all vehicle movements in and out of the site. The exiting vehicle will also turn across the incoming side of the entry ramp, requiring incoming vehicles to stop clear of the basement. These complex manoeuvres, on both the entry and exit, create potential conflicts between the waste / service vehicle and other vehicles accessing the site.</p> <p>Where vehicle access to the loading bay is off a main entry, which results in other vehicles being affected, the manoeuvres into and out of the bay need to be simple, with a straight turn in or out and a single reverse manoeuvre into the bay.</p>	<p>The loading dock is located at basement level 1 and has been designed to comply with the objectives of Council's 2036 CBD Planning and Urban Design Strategy, notably:</p> <ul style="list-style-type: none"> <li>▪ All vehicles are to enter and exit the site in a forward direction,</li> <li>▪ All commercial and residential loading / unloading is to occur on-site and not in public streets,</li> <li>▪ Floor space at ground level is to be maximised, with supporting functions such as car parking and loading located in basement levels, and</li> <li>▪ The design does not rely on a mechanical solution (e.g. turntable) for loading and unloading, with vehicles able to efficiently manoeuvre within the site.</li> </ul> <p>It is a common arrangement for loading docks to be located close to the base of the vehicular ramps in order to minimise conflicts with general traffic in the car park. The proposed arrangements minimise the travel distance required for trucks and therefore limit the extent of conflicts with general traffic.</p> <p>While waste collection and other delivery vehicles are infrequent and typically occur outside of busy periods the following measures will be implemented to further mitigate risks of conflicts between waste trucks and building users:</p> <ul style="list-style-type: none"> <li>▪ Installing convex mirrors at the basement level to provide directional sight lines between vehicles driving up the Basement 2 ramp and vehicles entering the building from ground level.</li> <li>▪ Installing a warning signal (e.g. flashing lights or similar) adjacent to the ground floor waste area which is triggered by heavy vehicles (including waste vehicles) travelling down the ramp from ground level. This is to make residents and visitors aware of the possibility of a vehicle entering at the same time they are departing.</li> <li>▪ Billbergia to provide details to residents of waste collection days and typical times so that residents are aware of times that waste trucks are likely to be on site.</li> <li>▪ Trucks to utilise reversing lights / beepers.</li> </ul>	<p>N/A</p>
<p>There are columns that are located in positions where the column impacts the minimum aisle or roadway widths. To comply with AS/NZS 2890.1, where a structure is located on one side of an aisle, the minimum aisle width is to be increased by 300mm, which for 2 way traffic flow requires a</p>	<p>Clause 3.2.2 of AS2890.1 notes that driveway ramps and circulation roadways can be designed with reduced widths that do not permit unobstructed two-way traffic movements in situations where there are expected to be less than 30 vehicle movements (two way) per hour. For the area in question traffic movements are anticipated to be well less than this threshold and therefore the proposed arrangement is considered acceptable.</p>	<p>N/A</p>

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<p>minimum width of 6.1m. Similarly, for a 2 way access way, the minimum distance between structures, including walls and columns, is 6.1. For the access way / aisle near Stair FS-6, the column is located within the access way, which narrows the roadway to 5.1m. The narrower width is not acceptable, as the width is such that vehicles may believe that there is sufficient room to pass. In other positions, columns are located directly against the edge of a 5.8m wide aisle, which does not provide the required 6.1m width adjacent to a structure.</p>	<p>The basement design has been updated to respond comments in relation to columns opposite parking bays and the design meets the requirements of AS2890.1. It is noted that a traffic engineering certificate will be required to be prepared prior to the commencement of construction, to the satisfaction of the PCA, confirming the parking layout is compliant with AS2890.1.</p>	
<p>The aisle at the end of the childcare parking area, beyond space Childcare 05, needs to extend at least 1m beyond the last space.</p>	<p>The Architectural Plans have been amended to allow 1m blind isle for childcare parking space 05.</p>	<p><b>RTS Appendix D</b></p>
<p>The plan provides only 3 visitor bicycle parking spaces at ground level, with the remaining visitor parking space in the basement. To enable easier access, an increased number of visitor parking spaces need to be provided at ground level, in visible locations that are easy to access and near all building entries. The plans should detail 2-3 visitor bicycle spaces (rails) for each building, near each building entry – outside of soft landscape and pedestrian movement areas.</p>	<p>The Architectural Plans have been amended to provide a total of 15 x visitor bicycle parking spaces at the ground level for ease of access. Spaces have been provided nearby to building entries.</p>	<p><b>RTS Appendix D</b></p>
<p><b>Waste comments</b></p>		
<p>The development needs to comply with North Sydney Regional Organisation of Councils (NSROC, 2018), particularly Section 3 for all developments, Section 5.3 for high residential flat buildings and Section 6 for mixed-use developments,</p>	<p>The Operational Waste Management Plan (<b>OWMP</b>) has been updated and prepared in accordance with the requirements of the North Sydney Regional Organisation of Councils (NSROC, 2018).</p>	<p><b>RTS Appendix N</b></p>
<p>Waste generation (residential) There is a shortfall in generation rate for organics</p>	<p>The OWMP provides the updated organics waste generation rates. The residential organics waste generation is estimated at 11,575 L/Week requiring 49 organics bins. The Architectural Plans have been updated to accommodate the required 49 organics bins at Basement Level 01.</p>	<p><b>RTS Appendix N</b> <b>RTS Appendix D</b></p>
<p>Bins (residential) The Applicant proposes an incorrect recycling collection frequency. The development should meet</p>	<p>The OWMP provides updated recycling waste generation rates. The residential recycling waste generation is estimated at 39,240 L/Week requiring a total of 37 recycling bins. Recycling is to be collected once on a weekly basis.</p>	<p><b>RTS Appendix N</b> <b>RTS Appendix D</b></p>

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<p>Option 1 for high-rise RFBs (NSROC 2018, Section 5.3, p. 46) hence the collection takes place on-site. The Council submission notes the required bin and service arrangements.</p>	<p>The Architectural Plans have been updated to accommodate the required 37 recycling bins at Basement Level 01.</p>	
<p>Bin area (residential) The OWMP (Rev G) does not state the areas provided in Council submission. The areas need to be clarified.</p>	<p>The OWMP provides the areas for each bin room in Section 16 of the Report, consistent with the Architectural Plans.</p>	<p><b>RTS Appendix N</b> <b>RTS Appendix D</b></p>
<p>Bulky waste and charity waste/other recycling Bulky waste: The current DCP requires 10m<sup>2</sup> for the first 40 units and 2m<sup>2</sup> per additional 10 units thereafter (NSROC, 2018, p29). For 332 units, this requires 69m<sup>2</sup>. Charity waste/other recycling: 6m<sup>2</sup> (NSROC, 2018, p30, Section 3.12.1) These areas have been provided together, but they should be separate areas for each of bulky waste and charity waste/other recycling.</p>	<p>The OWMP identifies the required areas of 69m<sup>2</sup> for the residential bulky waste room, and 6m<sup>2</sup> for charity waste/other recycling. The Architectural Plans have been updated to accommodate the required areas for bulky waste and charity waste.</p>	<p><b>RTS Appendix N</b> <b>RTS Appendix D</b></p>
<p>Waste collection: residential by Council The position of loading area means the truck makes a reversing manoeuvre near the building entry and exit ramp. The truck when in the loading area has its rear to the back of the loading area in a dead-end space whereby all of the bins and bulky waste would need to be brought around the truck. The side clearance is not shown for occupants exiting the vehicle (0.5) either side, but also any pathways for wheeling bins and carrying bulky waste (2.5m in the DCP). The 2m rear clearance for loading of bins (a 10.5m truck in a 12.5m parking space) is not shown.</p>	<p>The Architectural Plans have been updated to relocate the residential bin holding room adjacent to the rear of the loading dock. The rear of the waste collection vehicle will face toward the residential bin holding room, which provides the space required to load bins and bulky waste to the vehicle. The loading bay has been designed to a total length of 12.5 meters, allowing for a 10.5-meter truck with a 2-meter rear clearance.</p>	<p><b>RTS Appendix N</b> <b>RTS Appendix D</b></p>
<p>The bin rooms and bulky waste rooms required to located within 2m of the truck parking bay for onsite collection (e.g., NSROC 2018, p. 46 and Table 1). The bin holding rooms and bulky waste room are located across the active car park at quite long</p>	<p>The residential bin storage room and bulky waste room layout has been designed to optimize waste collection operations. The bin storage rooms are situated in close proximity to the collection point, allowing the rear of the collection vehicle to be positioned toward the bin storage rooms. The updated Architectural Plans have relocated the bin storage room and bulky waste storage room to improve accessibility and efficiency. The organics</p>	<p><b>RTS Appendix N</b> <b>RTS Appendix D</b></p>

Submission	Applicant Response	Appendix Reference
distances which would require substantial time and manual handling. The basement needs a redesign to comply with the DCP (NSROC, 2018, particularly Section 3.13.4) and enable collection of residential waste by Council (bins for waste, recycling and organics and bulky waste).	bin has been relocated within the main residential waste storage area, while the bulky waste room has been relocated, due to a lower collection frequency.	
Waste collection: commercial Commercial waste can be collected by a private contractor with a smaller truck (at least an SRV), but the loading bay should comply with similar requirements as residential waste. The plans do not clearly show: Parking space within 2m of the commercial bin room. Truck loading bay and suitable clearances.	The loading dock layout makes provision for Council's 10.5m long truck with a 2m clearance at the rear of the vehicle.	<b>N/A</b>
Commercial waste Consideration of commercial organics would be considered favourably. Further assessment of the commercial bins required will be necessary, such as when the size of the childcare is finalised (generation is based on children numbers, with 80 proposed).	An assessment of a commercial organics resource stream is not required, as it is anticipated that the organics generation will be very low.  The OWMP has been prepared with consideration of the finalised (and reduced) childcare capacity.	<b>RTS Appendix N</b>
Waste storage conditions and amenities The architectural drawings and OWMP should clearly provide details of the waste storage area conditions and amenities (NSROC 2018, Table 8 and Section 3.13.4), including drainage, taps and aisle width. All doors should be a minimum of 2.5m wide (NSROC).	The OWMP details these requirements throughout the document. Refer to Section 16 of the OWMP.	<b>RTS Appendix N</b>
Chute rooms and bin cupboards on each residential level The waste chute hoppers should be located in a waste cupboard, which also has space for additional bin(s). Tower A appears to have a room but Tower B does not appear to have a room (see Attachment 1 for an example floor layout). This is required in the WDCP 2023 NSROC (2018, p 46) and a recycling bin (in addition to any recycling chute proposed) serves to assist in the case of a bin for cardboard recycling that cannot be placed down the chute (which is a large portion of Council's recycling), back-up for the recycling chute and to	A dual chute system has been provided for both tower A and B, allowing for the separation of general waste and recycling. Irregular shaped items will be manually placed within these recycling bins by residents and monitored by the building caretaker.  The inclusion of a 240L bin at both towers would cause significant spatial constraints within the corridors and impacts to the surrounding services.	<b>RTS Appendix N</b> <b>RTS Appendix D</b>

Submission	Applicant Response	Appendix Reference
<p>future proof the development in the case of food organics collection.</p>		
<p>Construction and demolition waste  An updated response should be provided that addresses the following items:  Nominated current operating landfill facilities and recycling facilities, by waste type noting the recycling directory supplied in Table 9 of the C&amp;D WMP is out of date; and  Plans showing the location of onsite waste facilities during the demolition and construction phases, including vehicle access.</p>	<p>An updated Construction and Demolition Waste Management Plan has been prepared with an updated Recycling Directory.</p> <p>The preliminary CTMP provides a swept path analysis for construction vehicles during the construction stage, which can also be utilised by waste vehicles.</p>	<p><b>RTS Appendix O</b>  <b>RTS Appendix L</b></p>