

# Submissions Report

SSD-74670720

38-42 Anderson, 3 McIntosh and 2 Day  
Streets, Chatswood

PREPARED FOR

AEON RESIDENCE PTY LTD

July 2025

MECONE.COM.AU

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1	25 July 2025	Draft	GBASSETT
2			

\* This document is for discussion purposes only unless signed and dated by the persons identified.  
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# Appendices

APPENDIX	REPORT	PREPARED BY
F	Updated Architectural Plans	Carter Williamson
H	Updated Survey Plan	StrataSurv
I	Updated Landscape Plan	Land+form
J	Updated Landscape Design Report	Land+form
N	Updated Visual Impact Assessment	Urbis
S	Updated Noise and Vibration Impact Assessment	Renzo Tonin & Associates
W	Updated Flood Impact Risk Assessment	CEC
X	Updated Pedestrian Wind Environment Statement	Windtech
Y	Updated Waste Management Plan	Elephants Foot Consulting
AA	Updated Aboriginal Cultural Heritage Assessment Report	Artefact
AS	Updated Hydrogeological Assessment	CEC Geotechnical
AV	Updated Dewatering Management Plan	CEC Geotechnical
AW	Wind Letter	Windtech
AX	Traffic Letter	Stanbury
AY	Landscape Letter	Land+form
AZ	Arboricultural Letter	Seasoned Tree Consulting
BA	Flood Letter	CEC
BB	ESD Statement	Aspire Sustainability Consultants
BC	Updated Design Excellence Strategy	Mecone
BD	Public Submissions Register	Mecone



# Executive Summary

This Submissions Report has been prepared on behalf of Aeon Residence Pty Ltd (the **proponent**) to address matters raised by government agencies, local Council, relevant stakeholder groups and community during public exhibition of the proposed State Significant Development Application (**SSDA**) (SSD-74670720). The SSDA comprises the construction of a mixed use development comprising 250 residential apartments (including 49 in-fill affordable apartments), retail and office uses, excavation works and associated works at 38-42 Anderson, 3 McIntosh and 2 Day Streets, Chatswood (the **site**).

## Overview of Submissions

The SSDA was publicly exhibited between 23 May 2025 until 19 June 2025

There were 13 submissions from public agencies, including Willoughby City Council and other government agencies, and 13 submissions from members of the local community and individuals (one of which was in support of the proposed development and one of which provided only comments).

### Government agencies:

- Department of Planning, Housing and Infrastructure (DPHI)
- Willoughby City Council (Council)
- Transport for NSW (TfNSW)
- Heritage NSW
- Sydney Trains
- Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group
- Ausgrid
- Sydney Water Corporation
- Airservices Australia
- Sydney Metro
- Fire and Rescue NSW
- Civil Aviation Safety Authority (CASA)
- Conservation Programs, Heritage and Regulation Group (CPHR)

### General public:

- Milestone (AUST) Pty Limited
- Rex Mao
- Nayden Natchevski
- 10 anonymous submissions

### The key issues:

The key issues raised in the submissions can be broadly grouped into the following categories:

- Height and overshadowing
- Non-compliances with DCP



- Contributions
- Design excellence
- Landscaping and public domain
- Affordable housing
- Residential amenity
- Traffic and parking
- Noise
- Waste and engineering matters
- Flooding and stormwater management
- Infrastructure

This Submissions Report provides a response to all submissions received.

## Actions Taken Since Exhibition

DPHI issued the Key Issues Letter on 27 June 2025.

Following exhibition, upon review of all submissions received, a series of minor amendments have been made to the documentation to clarify aspects of the proposal. The amendments are inclusive of the following:

- Amendments to the ACHAR to include consultation logs and information requested by Heritage NSW.
- Updated Hydrogeological assessment and Dewatering management plan to confirm a tanked basement design.
- Amendment to Wind Assessment to clarify modelling and the need for mitigation measures
- Amendments to Traffic Assessment to clarify cycle parking, relevant Australian Standards, and visibility splays.
- Inclusion of an addendum Landscape letter and Amendments to Landscape Plans and landscape design report to correct annotations, and clarify deep soil provisions, tree removal and replacement planting.
- Amendments to Architectural Plans include additional annotations to clarify waste and storage provisions, update sun-eye diagrams, and revise western elevation to reflect addition of noise barrier.
- Amendments to ESD letter to clarify ESD commitments in response to Council comments.
- Inclusion of the design excellence strategy that informed the original competitive design excellence process for the site.
- Amendments to the VIA to address view sharing from neighbouring private properties.
- Amendments to Noise and Vibration Impact Assessment Report to address construction noise impacts, road traffic noise impacts, and noise emissions from communal open space area.
- Amendments to the Flood Impact Assessment to address CPHR commentary on modelling and finished floor levels.
- Amendments to the Waste Management Plan to address council comments on FOGO and bin storage clarifications.



## Response to Submissions

The Proponent has made minor amendments to the proposed development in response to the submissions. Refer to detailed responses at **Tables 3 – 6** below for further details on specific project amendments.

## Public and Social Benefit

The site is deemed highly suitable for the proposed development due to its alignment with planning controls, strategic objectives, and location benefits. The development complies with zoning regulations (MU1), supports the growth of the Chatswood CBD, makes efficient use of underutilised land, and contributes to housing supply with minimal environmental impact. It is appropriately scaled for its context and well-connected to public transport and major roads, enhancing its accessibility and integration with the broader region.

The proposal is in the public interest as it aligns with key State and local strategic plans, particularly the Chatswood CBD Strategy, and largely complies with relevant planning controls. It contributes to housing supply targets, addresses local housing needs, and has been assessed to pose no significant environmental impacts. Additionally, it will deliver affordable housing, commercial and retail spaces, generate local jobs, and support the efficient and sustainable use of the land.

## Updated Project Justification

This Report responds to each of the issues raised in the government agencies and public submissions received regarding the proposed shop-top housing development at the site.

There is no change to the evaluation of the proposal's statutory or strategic merit, as a result of the RTS.



# 1 Introduction

This Submissions Report has been prepared in support of State Significant Development Application (**SSDA**) SSD-74670720, on behalf of Aeon Residence Pty Ltd (the **proponent**) to address the matters raised by public agencies, Willoughby City Council, the community and other relevant stakeholders throughout the public exhibition period. The proposal was placed on public exhibition for 28 days between 23 May 2025 until 19 June 2025

This Submissions Report has been prepared in accordance with the DPHI's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C)* March 2024.

## 1.1 Exhibited Project Description

The proposed development (SSD-74670720) is located on Gamaraygal Country in the Metropolitan LALC and seeks development consent to construct a mixed use development with shop-top housing and recreation facility (indoor), that includes in-fill affordable housing, comprising the following:

- Site preparation works including demolition of existing structures, vegetation clearing, and bulk earthworks.
- Anderson Street Building (Tower A): Construction of a 33-storey shop-top housing development comprising:
  - 155 residential dwellings
  - Private rooftop terraces
  - Top of podium (level 2) communal open space and amenities
- McIntosh Street Building (Tower M): Construction of a 23-storey shop-top housing development comprising:
  - 103 residential dwellings
  - Private rooftop terraces
  - Top of podium (level 2) communal open space and amenities
  - Construction of a two-to three storey non-residential podium with substation, lift core, lobbies and building services
- Construction of a seven-level basement with waste storage, services, and loading, and 494 carparking spaces comprising:
  - 386 residential spaces (including 19 accessible spaces)
  - 36 residential visitor spaces (including 1 accessible spaces)
  - 72 commercial and retail spaces (including 2 accessible spaces)
  - 28 motorcycle spaces
  - 73 bicycle spaces
- Associated landscaping and public domain works
- Services and infrastructure improvements, as required



## 2 Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature / position and number of submissions received.

### 2.1 Breakdown of Submissions

The SSDA was publicly exhibited 23 May 2025 until 19 June 2025. There were 13 submissions from public agencies, including Willoughby City Council and other government agencies, and 13 submissions from members of the local community and individuals (one of which was in support of the proposed development).

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-74670720).

A breakdown of the submissions made by group and issues raised is provided in **Table 1** below with responses provided in **Section 4** with further detail provided in the Register of Submissions, refer to **Appendix BD**.

**Table 1: Overview of SSDA Submissions**

SOURCE	POSITION	NUMBER OF SUBMISSIONS
<b>Public Authorities</b>		
DPHI	Comment	1
Willoughby City Council	Object	1
Heritage NSW	Comment	1
Transport for NSW (TfNSW)	Comment	1
Sydney Trains	Comment	1
Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group	Comment	1
Ausgrid	Comment	1
Sydney Water	Comment	1
Sydney Metro	Comment	1
Fire and Rescue	Comment	1
Civil Aviation Safety Authority	Comment	1
Airservices Australia	Comment	1
Conservation Programs, Heritage and Regulation Group (CPHR)	Comment	1
<b>SUBTOTAL</b>		<b>13</b>
<b>General Public</b>		
Nayden Natchevski	Object	1
Rex Mao	Object	1
Milestone (AUST) Pty Limited	Object	1
Name withheld	Support	1



Name withheld	Object	8
Name withheld	Comment	1
<b>SUBTOTAL</b>		<b>13</b>
<b>TOTAL</b>		<b>26</b>

## 2.2 Key Themes & Categorisation

In accordance with the DPHI State Significant Development Guidelines, the issues raised in the submissions are summarised in **Table 2** below. A response to submissions is provided in **Section 4** and **5** of this report.

**Table 2: Categorisation of Key Issues**

CATEGORY	ISSUE	STAKEHOLDER
The Project	<b>Height and Overshadowing:</b>	
	<ul style="list-style-type: none"> <li>The infill affordable housing bonus should not override the LEP height control and the additional height is inappropriate for the location.</li> </ul>	Willoughby City Council
	<ul style="list-style-type: none"> <li>Height will cause overshadowing, loss of privacy, block easterly sun and dominate the skyline.</li> </ul>	Public submissions
	<ul style="list-style-type: none"> <li>Building A is excessively tall and bulky</li> </ul>	
	<b>Non-compliances</b>	
	<ul style="list-style-type: none"> <li>The proposed development falls short of the LEP mixed-use site requirements of at least 17% non-residential (Section 6.25) use by 4% (13% allocated). The justification offered is unconvincing, relying on the pre-bonus FSR. <ul style="list-style-type: none"> <li>The Clause 4.6 variation of the standard variation does not provide sufficient environmental planning grounds to justify the departure from this control.</li> </ul> </li> <li>It's unclear whether the proposal complies with the minimum 3 hrs direct solar access in mid-winter requirement. The justification overshadowing requirement for residents of 1 Day Street is unsatisfactory.</li> <li>The proposed Building A fails to achieve the required 5.85m tower setback to all boundaries.</li> </ul>	DPHI Willoughby City Council Public Submissions
<b>Contributions:</b>		
<ul style="list-style-type: none"> <li>Council anticipates the full payment of applicable s7.11 or s7.12 local contributions <ul style="list-style-type: none"> <li>Exemptions for affordable housing apply only to dwellings dedicated in perpetuity in accordance with the WLEP and there is no exemption for housing managed as affordable housing temporarily</li> </ul> </li> </ul>	Willoughby City Council	
<b>Design excellence:</b>		
<ul style="list-style-type: none"> <li>A Design Integrity Panel (DIP) conduct a review and is necessary under the Willoughby Design Excellence Strategy</li> <li>Tower setbacks should be consistent with the WDCP and Chatswood CBD Strategy.</li> </ul>	Willoughby City Council	
<b>Landscaping and public domain:</b>		



	<ul style="list-style-type: none"> <li>• Appropriate deep soil zones are required to be provided on the site.</li> <li>• Ensure appropriate deep soil is provided to facilitate the growth of the <i>Angophora costata</i>.</li> <li>• Tree replacement at a ratio of 3:1 is not possible on the site and Council requests the proponent to enter a Deed of Agreement with Council and pay a fee for the offsite planting of 87 trees in accordance with Willoughby Development Control Plan Part G.</li> </ul>	Willoughby City Council
	<b>Affordable housing:</b>	
	<ul style="list-style-type: none"> <li>• Affordable housing needs to be cancelled because it will introduce various social problems into a traditionally safe and family-oriented community</li> <li>• While Council acknowledges the decision of the Planning Panel regarding the affordable housing contribution applicable to the site (in relation to PP-2022-4316), Council continues to strongly support application of a 10% affordable housing contribution</li> </ul>	Willoughby City Council Public submissions
	<b>Residential amenity:</b>	DPHI
	<ul style="list-style-type: none"> <li>• Noise, overcrowding and other disruptions will reduce residents' quality of life.</li> <li>• Wind impacts on the adjacent elevated private open space area, 'Pacific Place'.</li> <li>• The proposal will block solar access</li> <li>• Potential view loss</li> <li>• Impact on water views</li> </ul>	Willoughby City Council Public submissions
	<b>Traffic and parking:</b>	DPHI
Economic, environmental and social impacts	<ul style="list-style-type: none"> <li>• Excess of parking spaces according to WDCP.</li> <li>• The SSDA is requested to be amended to have car parking consistent with the location's exceptional access to transit</li> <li>• Adding more resident and parking will exacerbate traffic and congestion.</li> <li>• The proposed development has not adequately demonstrated that HRVs can access the basement in accordance with relevant design standards and Council requirements</li> <li>• Increased traffic will reduce resident's and student's safety.</li> </ul>	Willoughby City Council Public submissions
	<b>Noise:</b>	DPHI
	<ul style="list-style-type: none"> <li>• The Noise and Vibration Impact Assessment (NVIA) must be updated to assess construction noise impacts, road traffic noise impacts, and noise emissions from communal open space area.</li> <li>• Noise, overcrowding and other disruptions will reduce residents' quality of life.</li> </ul>	Public submissions
	<b>Waste and engineering matters:</b>	
	<ul style="list-style-type: none"> <li>• Issues with temporary bin holding rooms, door widths, and waste collection frequency, inclusion of organic bins or not, waste vehicle access, swept paths, and waste collection.</li> </ul>	Willoughby City Council



**Flooding and Stormwater management:**

- Basement should be designed and constructed as a tanked structure.
- The stormwater management system requires redesign to address the issues
- CPHR expressed concerns around the development not meeting flood planning requirements, offsite impacts, flood mitigation measures, floor levels, protection of basement, location of services and flood emergency response plan.

CPHR Group

Willoughby City  
Council

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**Infrastructure:**

- Ausgrid requires that due consideration be given to the compatibility of proposed development with existing Ausgrid infrastructure, particularly in relation to risks of electrocution, fire risks, Electric & Magnetic Fields (EMFs), noise, visual amenity and other matters that may impact on Ausgrid or the development.
- Sydney Metro requires verification that the sites location is over 25m from the corridor and confirmation that there will be no ground anchors to be installed within 2nd reserve of metro corridor.
- DCCEW requests the proponent to ensure the requirements to claim an exemption for a Water Access Licence (WAL).
- The additional population from the proposal will further strain infrastructure - roads, public transport, schools and healthcare - without adequate provisions for expansion.

Ausgrid

Sydney Metro

DCCEW

Public submissions

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**Building Sustainability:**

- The exhibited amendments to the LEP require development in the MU1 Mixed Use Zone to achieve a minimum 5 star GBCA building rating. Council seeks a clear commitment consistent with the exhibited WDCP amendment (soon to be finalised) for a minimum 5 star GBCA rating or the equivalent for the proposed SSDA development

Willoughby City  
Council

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**Aboriginal Cultural Heritage:**

- HNSW requires further evidence that the RAPs were consulted throughout the engagement process

Heritage NSW



## 3 Actions Taken Since Exhibition

In response to the key issues raised within the submissions, minor design refinements and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines the additional assessment undertaken to respond to the concerns raised with the public agency and public submissions outlined in **Section 4**.

### 3.1 Further Engagement

#### 3.1.1 Department of Planning, Housing and Infrastructure

DPHI issued the Key Issues Letter on 27 June 2025. Given the nature of issues raised, this report provides the Proponent's response.

### 3.2 Refinements to the Project

Following exhibition, upon review of all submissions received, a series of minor amendments have been made to the documentation to clarify aspects of the proposal. The amendments are inclusive of the following:

- Amendments to the ACHAR to include consultation logs and information requested by Heritage NSW.
- Updated Hydrogeological assessment and Dewatering management plan to confirm a tanked basement design.
- Amendment to Wind Assessment to clarify modelling and the need for mitigation measures
- Amendments to Traffic Assessment to clarify cycle parking, relevant Australian Standards, and visibility splays.
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- Amendments to Architectural Plans include additional annotations to clarify waste and storage provisions, update sun-eye diagrams, and revise western elevation.
- Amendments to ESD letter to clarify ESD commitments in response to Council comments.
- Inclusion of the design excellence strategy that informed the original competitive design excellence process for the site.
- Amendments to the VIA to address view sharing from neighbouring private properties.
- Amendments to Noise and Vibration Impact Assessment Report to address construction noise impacts, road traffic noise impacts, and noise emissions from communal open space area.
- Amendments to the Flood Impact Assessment to address CPHR commentary on modelling and finished floor levels.
- Amendments to the Waste Management Plan to address council comments on FOGO and bin storage clarifications.

Details of the design refinements are illustrated in the updated Architectural Plans at **Appendix F**. Refer to detailed responses at **Tables 3 - 6** below for further details on specific project amendments.



# 4 Response to Submissions

## 4.1 Department of Planning, Housing and Infrastructure


**Table 3** sets out a response to each issue raised by the **Department of Planning, Housing and Infrastructure** submission.

**Table 3: DPHI Submission & Responses**

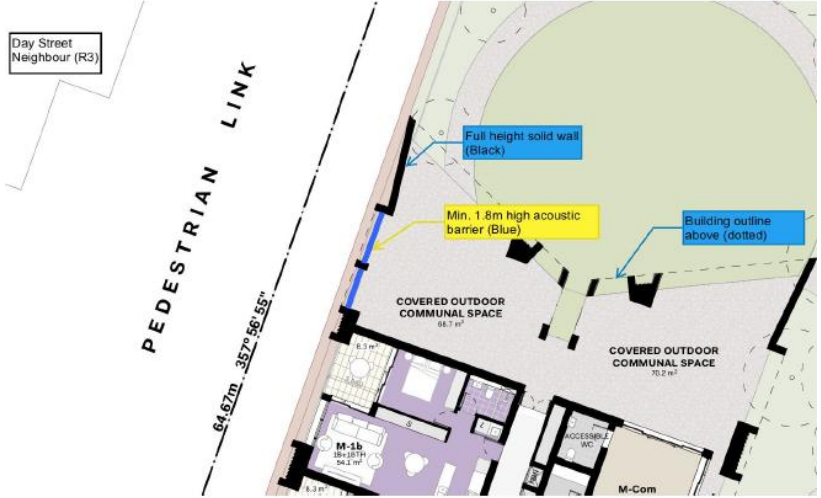
ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
<b>1. Car parking</b>		
DPHI-1	<p>The proposal includes 360 car parking spaces allocated to market rate residential apartments, which is 96 spaces more than the non-discretionary development standard under section 19 of the Housing SEPP. The Chatswood CBD is a highly accessible location, serviced by various modes of high-frequency public transport.</p> <p>The Department therefore requests that the number of residential car parking spaces be reduced to align with the minimum Housing SEPP car parking rates. Additionally, the number of non-residential car parking spaces should not exceed the maximum rates specified in the Willoughby DCP.</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> <ul style="list-style-type: none"> <li>(a) <i>is not entitled to take those standards into further consideration in determining the development application, and</i></li> <li>(b) <i>must not refuse the application on the ground that the development does not comply with those standards, and</i></li> <li>(c) <i>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></li> </ul> <p>Given the parking standard provides a minimum rate, the proposed car parking provision beyond the minimum rates still meets the controls in Section 19(e) and (f) of the Housing SEPP. The proponent has used the DCP as a guideline and has sought deliver parking as close as possible to what the DCP recommends.</p>


ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<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 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>
<b>2. Solar access</b>		
DPHI-2	<p>Please provide solar access diagrams and sun eye views to assess the likely shadow impacts of future high-density residential developments at 54-56 Anderson Street (SSD-78520463) and 44-52 Anderson Street (SSD-75408008). Reduced solar access on communal open space areas and proposed apartments due to the future developments must be addressed and justification provided.</p>	<p>The residential developments at 54–56 Anderson Street (SSD-78520463) and 44–52 Anderson Street (SSD-75408008) have been modelled and their form added to the sun-eye views.</p> <p>The revised sun-eye views which include future development due north of the site, have been analysed and demonstrate there would be no adverse impact, to the solar access received by the proposed apartments.</p> <p>The majority of the Anderson tower apartments receive their solar access from 9am - 12pm, prior to it being overshadowed by 44-52 Anderson Street. Likewise, the majority of the McIntosh tower apartments receive their solar access from 1pm-3pm after it is being overshadowed by 44-52 Anderson Street.</p> <p>There is an impact to the solar access to the communal open spaces areas on the Level 2 Podium, but this still well exceeds the ADG guidelines as the principle communal open space receives 100% direct sunlight for more than 3 hours (9-10am and 1- 3pm in mid-winter). The future uplift of the sites to the north were anticipated in</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p>the design and siting of the two towers, and the principle communal open space on the North-western corner of the podium.</p> <p>Refer to the revised sun-eye views in the updated Architectural Plans at <b>Appendix F</b>.</p>
<b>3. Noise impacts</b>		
DPHI-3	<p>The Noise and Vibration Impact Assessment (NVIA) must be updated to assess the following:</p> <p>a) Road traffic noise impacts from the Pacific Highway for apartments on the upper levels of the proposed building in accordance with the Transport and Infrastructure SEPP.</p>	<p>As a result of a further assessment of road traffic noise impacts from surrounding roads including noise contribution from Pacific Highway, the acoustic performance requirement for glazing to apartments that are exposed to Pacific Highway has been increased from a sound reduction index of Rw 25 to Rw 27 to achieve compliance with internal noise criteria stipulated in Clause 2.120 (3) of the TISEPP.</p> <p>The upgrade in glazing Rw is shown in the typical markup floorplan (refer to <b>Figure 1</b> below) and refer to Sections 3 and 5 of the updated NVIA Report at <b>Appendix S</b> for further details.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		 <p><b>Figure 1: Glazing Plan</b> Source: Renzo &amp; Tonin</p>
DPHI-4	<p>b) Construction noise impacts surrounding residential buildings, including at 1 Cambridge Lane, 9 Railway Street, and 11 Railway Street and consider whether additional construction noise mitigation and management measures are necessary.</p>	<p>The revised NVIA Report (<b>Appendix S</b>) considers construction noise impacts at Railway Street and Cambridge Lane. It finds:</p> <ul style="list-style-type: none"> <li>• Construction noise levels at residences on 1 Cambridge Lane (R4) are similar to R1 and therefore the noise mitigation measures provided in Section 9.4 of the NVIA Report are also applicable to receiver R4.</li> <li>• Construction noise levels at the residences on 9 Railway Street and 11 Railway Street will comply with the Project noise management levels due to a greater distance from the site and noise-shielding effect of the lower-rise buildings between the site and residences on Railway Street.</li> </ul>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		Refer to Figure 2-1, Section 9.1 and Table 9-5 of the updated NVIA report ( <b>Appendix S</b> ) for further details.
DPHI-5	c) Noise emissions from the communal open space area adjacent to the pedestrian link – identified in the Landscape Plans as ‘BBQ/kitchen/dining’. If necessary, recommendations should be made to mitigate acoustic impacts on the adjacent residences at 1 Day Street.	<p>The proposed communal open space on Level 3 was erroneously identified as ‘BBQ/kitchen/dining’ in the landscape plans. Amended landscape plans are now provided at <b>Appendix I</b>.</p> <p>Nevertheless, this area is not expected to cause unacceptable noise impacts to residences at 1 Day Street. This is due to its undercover/semi-enclosed nature with a northward-facing opening (perpendicular to Day Street) and limited capacity. Further it has a separation distance of at least 17m from the nearest 1 Day Street apartments across a pedestrian laneway which is already well-landscaped with significant tree-canopy. This space is not accessible to the public and its usage will be limited to residents and their guests for ordinary domestic purposes which are unlikely to give rise to unacceptable noise impacts.</p> <p>Modifications have been made to the western facade to minimise any noise disturbance to neighbours at 1 Day Street as per the recommendations of the NVIA by Renzo Tonin &amp; Associates (<b>Appendix S</b>). A 1.8m solid glass wall on the western side of the covered communal space is shown in <b>Figure 2</b> below. This combined with the full-height solid western wall of the communal space will form an effective acoustic barrier against any direct sound transfer across the pedestrian link from this space.</p> <p>Refer to Section 7.2.2.3 the updated NVIA report (<b>Appendix S</b>) and the revised floor plans prepared by Carter Williamson (<b>Appendix F</b>).</p>


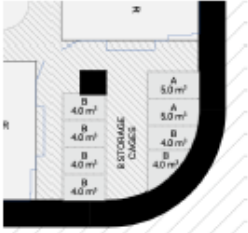
ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		 <p data-bbox="1200 754 1659 783"><b>Figure 2: Floor Plan showing Glass Wall</b></p> <p data-bbox="1200 788 1451 817">Source: Renzo &amp; Tonin</p>
DPHI-6	d) Confirm whether the doors proposed on the western section of the Level 1 terrace will be removed, consistent with the NVIA recommendation to reduce impact on the nearby residences at 1 Day Street.	<p data-bbox="1200 847 2029 1050">All west facing doors on Level 1 have been removed and replaced with fixed glazing. A 1.8m solid glass balustrade / noise barrier has been added to the western side of the Covered Outdoor Communal space on Level 2. This satisfies the recommendation made in the original NVIA report to minimise noise impact to nearby residences on 1 Day Street.</p> <p data-bbox="1200 1074 2011 1139">Refer to the revised western elevation in updated Architectural Plans (<b>Appendix F</b>).</p>
<b>4. Other issues</b>		
DPHI-7	a) Consider potential view loss from 9 Railway Street and 11 Railway Street, having regard to the planning principles established in Tenacity Consulting v Warringah Council [2004] NSWLEC 140.	<p data-bbox="1200 1238 2011 1369">The submission prepared by Milestone provides an image of views from level 31 of the Epica tower at 9 Railway Street. Based on an indicative building envelope, it demonstrates that residents of 9 Railway Street will still benefit from expansive east-facing views with</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p>all significant views being retained, such as Manly Beach, North Head, and Sydney Harbour. This figure is re-produced below:</p>  <p><b>Figure 3: View from level 31 of the Epica tower at 9 Railway Street</b>  <i>Source: Milestone</i></p> <p>An updated Visual Impact Assessment (VIA) is provided at <b>Appendix N</b>. Being based on CGI's it overstates extent of the visual impact of the proposed development. Nevertheless the assessment shows that there would be a minor-moderate impact to all views. 3 out of the 4 views aptly demonstrate Tenacity's principles of view sharing.</p> <p>One viewpoint (CGI 3), taken from an apartment in 9 Railway Street, which is directly west of the site, was found to have a minor to moderate impact. This is due to the nature of the view, which comprises district vistas and the horizon line. The view from this apartment is not predominantly characterised by scenic compositions in Tenacity terms.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p>It should be noted that the minor-moderate view impact from CGI 3 at 9 Railway Street relates to a single-aspect apartment that is angled at a north-east orientation and which currently benefits from an uninterrupted outlook. The views assessed are predominantly taken perpendicular to the facades, meaning the actual visual impact will be less given resident's orientation within the apartment.</p> <p>Overall the impact of the proposal on private views is considered acceptable, as the proposed development complies with both the desired future character of the area and the maximum permissible planning controls for the site.</p> <p>Considering the principles established in Tenacity Consulting v Warringah Council [2004] NSWLEC 140:</p> <p><b><u>Step 1 - Assessment of the views to be affected:</u></b></p> <p>Epica (9 Railway Street) and 11 Railway Street are afforded expansive district views and highly valued iconic views of North Head, Manly Beach, Sydney Harbour and the Pacific Ocean (as shown in the figure above). Noting the distance of the site from the water, the direct interface between land and water is not visible from the site.</p> <p><b><u>Step 2 - Consideration from what part of the property the views are obtained:</u></b></p> <p>The views are afforded from primary living areas, and bedrooms as well as areas of private open space, with only the uppermost floors of the building having views of the Pacific Ocean.</p> <p><b><u>Step 3 - Assessment of the extent of the impact:</u></b></p> <p>As demonstrated in the VIA, the notable iconic views will be retained at all levels of the Epica tower. The proposal offset from these iconic views, ensuring view sharing is achieved.</p> <p>At 11 Railway Street, while some views may be partially impacted, residents will still enjoy water views and expansive outlooks from the</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p>primary and private living areas, noting that the development will be located southeast of the building and will therefore not directly impact views from these areas.</p> <p><b><u>Step 4– Assessment of the reasonableness of the proposal that is causing the impact:</u></b></p> <p>The proposal is fully compliant with the maximum permissible controls for the site and aligns with the desired future character of the Chatswood CBD – noting that it does make use of additional height and floorspace which is awarded for the provision of 15% infill affordable housing. The proposed design has been skillfully composed as a result of a design excellence competition – and through stepped building heights maximises opportunities for view sharing.</p> <p>Although some view loss will occur, living areas and private spaces to residences at Epica and 11 Railway Street will still be afforded water and iconic views, as well as uninterrupted views to the north/north-east. The impacts on residents at Epica and 11 Railway Street are considered to be reasonable and demonstrate that view sharing is achieved.</p> <p>Overall, the proposal is aligned with the principles of Tenacity Consulting v Warringah Council [2004] NSWLEC 140 and will ensure that view sharing is maximised for all affected residences.</p>
DPHI-8	b) Undertake wind tunnel testing and update the Pedestrian Wind Environment Statement accordingly. Wind impacts on the adjacent elevated private open space area, 'Pacific Place', must be addressed (refer to objection from Milestone dated 19 June 2025).	<p>A letter from Windtech dated 11 July (<b>Appendix AW</b>) has been provided and advises that the development is unlikely to have adverse impacts on the surrounding developments.</p> <p>The Epica building and part of the Cambridge building are located outside of AWES guidelines (2024) area of influence. In summary;</p> <p><i>“Windtech expects that the desktop analysis of the four additional premises to be sufficient in addressing the concerns raised by the Owner Corporations and that the</i></p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p><i>AEON development is unlikely to alter the wind conditions experienced within the communal open space and the private balconies discussed in this letter”.</i></p> <p><i>“In summary, Windtech believes that the AEON development is unlikely to have any adverse impact on the Pacific Place communal open space, and private balconies of B2E, Epica and Cambridge buildings, assuming the existing street vegetation is retained”.</i></p> <p>Therefore, wind tunnel testing is not considered likely to result in any change to the proposed mitigation measures. In alignment with this statement, an updated Pedestrian Wind Environment Statement has been prepared at <b>Appendix X</b>, which includes reference to the Pacific Place communal open space in Section 5.4.</p>
DPHI-9	c) The architectural drawings should identify the storage capacity within apartments and the storage capacity to be provided elsewhere in the proposed development as recommended in the ADG.	<p>Storage capacity for all apartments exceeds the minimum ADG recommendations for storage within the apartment and in the basements. 50% or more of the minimum recommendation has been provided within the apartment.</p> <p>There is a dedicated storage room with storage cages for residents of the Anderson tower at basement 1 and the remainder of the storage cages are within the residential basement carparking levels.</p> <p>Refer to the figures below and the updated floor plans of the residential levels, basement levels and storage calculations have been provided in the updated Architectural Plans (<b>Appendix F</b>).</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		 <p data-bbox="1211 775 2007 807">Figure 1.4 – Residential Storage Area in B1 of Anderson Building</p>  <p data-bbox="1267 1121 1951 1153">Figure 1.5 – Example of Basement Level Storage Cages</p>

## 4.2 Willoughby City Council

**Table 4** sets out a response to each issue raised within the **Willoughby City Council** submission dated 16 June 2025.

**Table 4: Willoughby City Council Submission & Responses**

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
<b>1. Height on CBD Boundary</b>		
WCC-1	<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. Council seeks for the proposal on this site to have appropriate regard to the location on the boundary of the Chatswood CBD, opposite the low density residential North Chatswood Conservation Area. The impact on adjoining land (and the other side of Anderson Street) is considered excessive, taking into account the building's height, scale and bulk. Particular regard is drawn to the expectations of the CBD Strategy and WDCP.</p> <p>A nuanced approach to the Housing SEPP 30% bonus uplift is sought, with the proposed additional height in this location considered inappropriate based on bulk and scale impacts on the CBD boundary to the adjacent low density residential conservation area, and undermines recent strategic planning and community faith in the NSW planning system. The heights in this location have recently been substantially increased and indeed maximised. Council does not support any further increase in height above the existing WLEP height controls.</p>	<p>The proposed development has been designed with careful consideration of its impact on the surrounding area. Ultimately, the additional tower height and separation of the two towers results in more elegant and slender tower forms for both the Anderson Street and McIntosh Street buildings. This more closely aligns with the desired future character of the Chatswood CBD, which envisions 'slender tower forms' within the MU1 Mixed Use zone at the CBD's periphery.</p> <p>The Practice Note provides the following guidance:</p> <p><i>When applying in-fill affordable housing bonuses, applicants and consent authorities should adopt a flexible design approach, considering:</i></p> <ul style="list-style-type: none"> <li>• The Government's policy intent to increase affordable housing through the in-fill affordable housing provisions of the Housing SEPP.</li> <li>• The development's impact on the site's amenity and that of adjoining land, taking into account building height, scale, and bulk.</li> </ul> <p>In response, this proposal provides 15% in-fill affordable housing and makes use of the allowable additional 30% height and floorspace. By doing so, the proposal supports the Government's objective of increasing affordable housing while appropriately managing its impact on the surrounding area.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p>The development's impact on site and adjoining land amenity is detailed in Section 6 of the EIS. In summary:</p> <ul style="list-style-type: none"> <li> <b>Overshadowing:</b> The overall building envelope, height and massing were established by the design excellence competition process. A detailed shadow analysis has been undertaken at hourly intervals by Carter Williamson and demonstrates the impact of 30% additional height and floorspace is negligible. </li> </ul> <p>Careful consideration has been given to the Victoria Avenue and the Concourse area between midday and 2pm in mid-winter, in accordance with Clause 6.15 of the LEP. The resulting shadowing impact from the proposed development is commensurate with that anticipated under the Chatswood CBD Strategy and is not anticipated to result in any unacceptable impacts on the surrounding area.</p> <ul style="list-style-type: none"> <li> <b>Building separation:</b> The proposal maintains the building separation distances from the competition-winning scheme, which align with the design criteria in Objective 3F-1 of the Apartment Design Guide (ADG). There is no change to compliance in this regard. </li> <li> <b>Setbacks:</b> The built form has maximised views to the east and city views to the south, by placing the taller building along Anderson Street. The Anderson Street Building (Tower A) is setback to the sides to provide views from the rear wings of the plan. This allows more apartments to enjoy the district views to the east. The tower form is articulated into two tower forms that respond to ADG separation distances. The McIntosh Building (Tower M) form is angled for privacy and to optimise the northern sun. </li> </ul>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<ul style="list-style-type: none"> <li>• <b>Visual Impact:</b> Whilst visible from private views, the skilful design incorporates measures to reduce view impact on nearby residential properties and view sharing is achieved. View loss associated with the proposal ranges from just moderate, to negligible and that the proposed development is largely compatible with its context and will not impact on the current views of the Chatswood CBD skyline from public spaces such as Beauchamp Park. Further, view sharing is achieved as iconic views and vistas such as Coogee, Manly Beach, North head and Sydney Harbour are maintained.</li> </ul>
<p><b>2. Affordable housing contribution</b></p>		
<p>WCC-2</p>	<p>While Council acknowledges the decision of the Planning Panel regarding the affordable housing contribution applicable to the site (in relation to PP-2022-4316), Council continues to strongly support application of a 10% affordable housing contribution across all relevant sites, including this site, in accordance with WLEP 2012. The subject site is experiencing significant uplift and is capable to provide a 10% affordable housing contribution in line with other MU1 Mixed Use zoned land in the Chatswood CBD.</p> <p>Further, 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.</p> <p>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</p>	<p>The Planning Proposal (PP-2022-4316) was recommended for finalisation as of 24 June 2025 and on 4 July 2025 SNPP determined to recommend to the Minister that the plan be made. The Planning proposal provides for 7% LEP affordable housing across the site, excluding 38 Anderson (which will remain as 10% affordable housing).</p> <p>We are awaiting legal instrument to be drafted by Parliamentary Counsel before then being gazetted. We anticipate this will occur before 29 August 2025 when the Gateway Determination expires.</p> <p>Monetary contributions are proposed to align with this requirement.</p> <p>The GFA calculation has been pro-rated as below:</p> <p>Total site area: 4,445sq.m (100%)</p> <p>Site area for 38 Anderson Street: 1318.1sq.m (<b>29.65%</b>)</p> <p>Total residential GFA: 30,124.4</p> <ul style="list-style-type: none"> <li>• Excluding 38 Anderson Street: 70.35% of residential GFA (21,192.52) at 7% AH contribution = <b>1483.48sq.m</b></li> <li>• 38 Anderson Street: 29.65% of residential GFA (8931.88) at 10% AH contribution = <b>893.19sq.m</b></li> </ul>

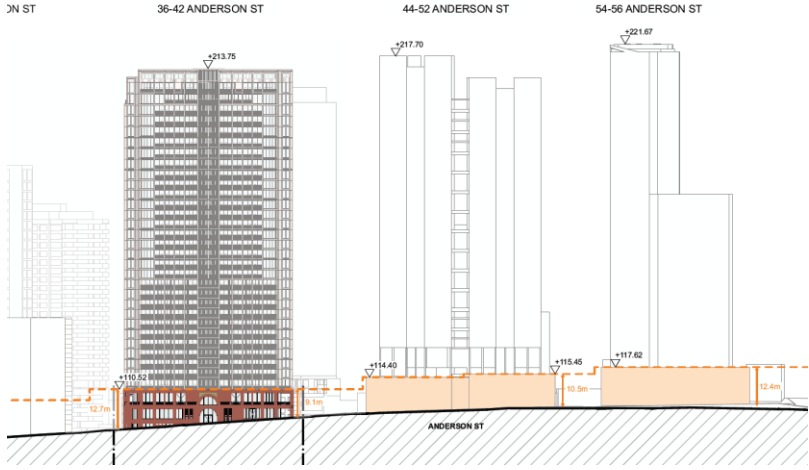
ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>and the SEPP). This information should be submitted as part of this SSDA.</p> <p>Having regard to any final decision on this matter, affordable housing conditions are provided at Attachment 3.</p>	<p><b>Total LEP affordable housing contribution = 2,376.67sq.m</b></p>
<p><b>3. Infrastructure contributions</b></p>		
<p>WCC-3</p>	<p>Council welcomes the opportunity to confirm the requirements under Willoughby Local Contributions Plan 2019 prior to the finalisation of any relevant conditions, should the application proceed to the drafting of a consent. In calculating infrastructure contribution payments, the proponent must consider the applicable rates and any credits available for the existing development on the site.</p> <p>Exemptions for affordable housing apply only to dwellings dedicated in perpetuity in accordance with the WLEP and there is no exemption for housing managed as affordable housing temporarily. Infrastructure contribution conditions are provided in Attachment 3.</p>	<p>Section 2.6 of Willoughby's 7.11 Contribution Plan stipulates certain types of development that are 'exempt' from paying contributions under the plan, which specifically calls out affordable housing as exempt from paying contributions.</p> <p>Given that the contributions plan does not give a definition of 'social housing and affordable housing', it is considered that affordable housing provided as a monetary contribution is still deemed to satisfy this criterion for exemption.</p> <p>Therefore, it is our view that it is appropriate for an exemption to be granted for the 'affordable housing' dwellings, with the remainder of the development and market housing to be levied as usual under the 7.11 Contribution Plan.</p>
<p><b>4. Vehicle access and service requirements</b></p>		

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
WCC-4.1	<p><b>Service Vehicle requirements</b></p> <p>Council requires the development to include an on-site loading dock and accommodate Heavy Rigid Vehicles (HRVs) for waste disposal. While the proposal addresses these needs, Council needs more information to confirm their adequacy. The plan includes a ground-level loading dock for various uses and is designed for HRV access, which will involve kerb modifications and moving street signs—requiring Council coordination. The proposal must also meet grade requirements for HRVs and Medium Rigid Vehicles (MRVs) as per AS/NZS 2890.2:2018, but these grade details have not yet been provided.</p>	<p>The proponent welcomes conditions of consent to secure appropriate kerb and street signage modifications prior to the first Occupation Certificate being granted.</p>
WCC-4.2	<p>Council supports the provision of an on-site loading dock and access for Heavy Rigid Vehicles (HRVs) to facilitate waste collection and servicing. However, the proposed development has not adequately demonstrated that HRVs can access the basement in accordance with relevant design standards and Council requirements. Additional information is required, including detailed swept path diagrams and grade levels, to confirm that vehicles can enter and exit the basement in a forward direction. This is necessary to ensure safe vehicle manoeuvring and to maintain pedestrian safety within and around the site.</p> <p>If a HRV waste vehicle cannot pass a B99 vehicle at all locations, documentation must be provided to demonstrate where passing can occur and how potential conflicts will be managed. Waiting vehicles must remain within the site boundary; vehicles must not reverse over the property boundary to facilitate passing.</p>	<p>The Transport Impact Assessment (<b>TIA</b>) submitted as part of the lodgement package included a swept path assessment in Appendix 5 of that document. Please refer to Appendix 5 of the TIA.</p> <p>The swept paths demonstrate that the HRV can enter and exit the basement in a forward direction from McIntosh Street.</p> <p>A HRV vehicle does not pass a B99 due to the design of building and location of the loading dock. Vehicles travelling to the loading dock proceed straight ahead on the main ramp and B99 and B85 vehicles turn right to access the rest of the building's basement.</p>
WCC-4.2	<p><b>Vehicular Access</b></p>	<p>Please refer to Appendix 5 of the TIA Sheet 8 of 17 to see the location of the splay which meets the requirements of AS2890.1:2004.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>The recommended sight lines stated in AS2890.2:2018 are required to be dimensioned on driveway drawings at the vehicular access. In order to ensure minimum sight distances in accordance with AS/NZS 2890.1 Figure 3.3, a minimum clear splay of 2m x 2.5m on both sides of the driveway exit is to be provided to ensure vehicle and pedestrian safety. Due to the pedestrian path immediately adjacent to the building and vehicle exit, details must be provided to demonstrate how the sight distance to pedestrians will be achieved. Council does not support the use of mirrors to achieve this where the path is in the road reserve.</p>	<p>The traffic engineer has confirmed that a splay is not required on the entry side of a two-way driveway as per the requirements of Figure 3.3 of AS2890.1:2004.</p> <p>While it is acknowledged that Figure 3.4 of AS2890.2:2018 nominates a sightline triangle on both sides of the access driveway, this is predicated on vehicles being able to use the full width of the site access driveway, which is not required at the proposed development.</p> <p>Accordingly, a sightline triangle only on the departure side of the driveway is considered necessary and no changes are required to the proposed design.</p>
<b>5. Excessive car parking spaces</b>		
WCC-5	<p>Council seeks an approach to car parking in the Chatswood CBD that aligns with the significant and successful investment in the Metro, rather than default provisions that apply more broadly across NSW or outside metropolitan transport precincts. In considering this SSDA, Council requests that emphasis be placed on the planning document that prescribes the lowest applicable car parking rate within the Chatswood CBD railway precinct—namely, the Willoughby Development Control Plan (WDCP), Part F: Transport and Parking Management. Strategic planning and traffic modelling for the Chatswood CBD are based on the enforcement of low parking rates to encourage a shift away from car use and to support the substantial public investment in the Chatswood Metro and other transport infrastructure.</p> <p>The proposed number of residential car spaces is 386. This significantly exceeds the maximum residential car space rate of 127 in Council's WDCP. The SSDA is requested to be amended</p>	<p>The minimum car parking requirement is prescribed as a non-discretionary 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 is a DA complies with the non-discretionary development standards in an EPI, the consent authority:</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><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>

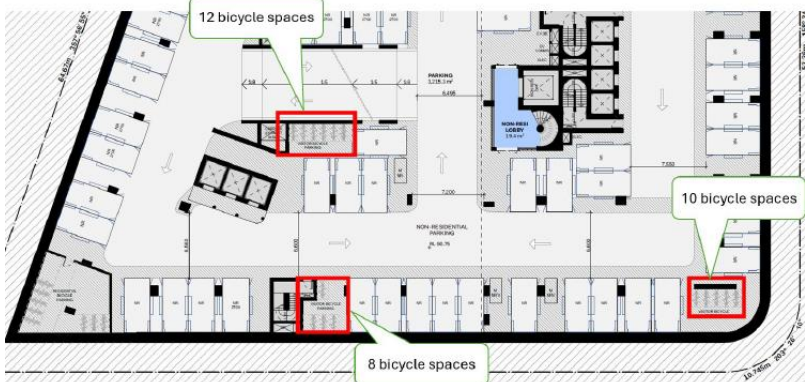
ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>to have car parking consistent with the location's exceptional access to transit and WDCP car parking rates.</p>	<p>Given the parking standard provides a minimum rate, the proposed car parking provision beyond the minimum rates still meets the controls 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 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>The WDCP rates were set following consultation with TfNSW and strategic modelling of the growth in Chatswood CBD, noting the constraint of increasing congestion on the Pacific Highway and the ongoing regional importance of the Pacific Highway. The WDCP rates seeks to decrease reliance on cars, minimise traffic congestion, encourage and increase active transport options and maximise amenity at street level for workers and residents in order to ensure impacts on regional capacity remain acceptable. Approving applications the CBD with parking provision well above the WDCP rates will likely cause significant congestion on the Pacific Highway as well as in the local traffic network.</p>	<p>The submission received from TfNSW during exhibition confirmed the following:</p> <p><i>"TfNSW has reviewed the submitted application and raises no objection as the proposed development is unlikely to have a significant impact on the state classified road network (i.e. Pacific Highway)."</i></p> <p>This support from TfNSW confirms that the proposed development is unlikely to exhibit a significant impact on the state road network.</p> <p>Further, as established in the TIA prepared by Stanbury at <b>Appendix O</b> of the lodgement package, the expected traffic generation arising from the current proposal is will not result in any unacceptable impacts on the surrounding road network.</p>
<p><b>6. Tower setbacks and podium heights</b></p>		

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
WCC-6	<p>The CBD Strategy was developed to promote slender tower forms within the CBD, with the objective of reducing bulk and scale, minimising overshadowing, mitigating impacts on the adjacent North Chatswood Conservation Area, and limiting adverse effects on neighbouring properties. The proposed Building A is excessively tall and bulky, and fails to achieve these intended outcomes, particularly regarding the required 5.85m tower setback to all boundaries. Tower setbacks should be provided consistent with the WDCP and CBD Strategy to ensure a slender tower form.</p> <p>Compliant tower setbacks and podium street wall heights are sought that have greater sympathy to the location, having particular regard to the low density residential North Chatswood Conservation Area to the east and the publicly accessible pathway and landscaped area to the west.</p>	<p>The proposed development went through an extensive design excellence process in which the proposal has maintained the same setbacks and street wall heights as endorsed by the jury.</p> <p>The development features well-proportioned facades within the streetscape (refer to <b>Figure 2</b>). Residential towers are generally setback 1 metre from the podium (1.45 metres along Anderson Street), with articulated forms in both plan and elevation. Tower A on Anderson Street appears narrower from the street due to side setbacks and is positioned to maximise city and eastern views, benefiting more apartments. It is designed as two articulated forms to meet ADG separation guidelines. Tower M is angled for privacy and better northern sunlight. With towers oriented north-south, end apartments are dual aspect, while others face east or west.</p> <p>Although all setbacks are not strictly compliant with the DCP requirement, the Anderson Street tower (Building A) achieves a floor plate of 654.4m<sup>2</sup> demonstrating its slender tower form, by achieving a floor plate area less than the maximum 700sq.m under the Part L of the DCP – which has been used as a guideline.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		 <p data-bbox="1198 734 1612 790"><b>Figure 4: Anderson Street Elevation</b> Source: Carter Williams</p>
<b>7. Landscaping and the public domain</b>		
WCC-7	<p data-bbox="409 877 1178 1225">Appropriate deep soil zones are required to be provided on site, particularly to facilitate the growth of the Angophora costata which is intended to be a key feature of the site. Most of the area identified as deep soil area surrounding the feature Angophora costata is shown to be paved, with only a few small isolated planter beds and a small portion to be compacted decomposed granite. Deep soil areas should be free of structures including paving. It is noted that the lack of basement structure to the space will provide soil volume for the feature tree to grow to its full height.</p> <p data-bbox="409 1249 1178 1417">Tree replacement at a ratio of 3:1 is not possible on the site and Council requests the proponent to enter a Deed of Agreement with Council and pay a fee for the offsite planting of 87 trees in accordance with Willoughby Development Control Plan Part G Vegetation Management clause 6 Replacement Trees and Part</p>	<p data-bbox="1200 877 2033 1013">The site achieves approximately 16.3% deep soil, meeting all the ADG requirements in section 3E-1 including the minimum 7% deep soil, stretch target of 15% deep soil on sites larger than 1,500m<sup>2</sup>, and appropriate setbacks to allow for tree planting and retention.</p> <p data-bbox="1200 1037 2033 1241">The area outside the basement footprint (outlined in blue below) is designed to incorporate decomposed granite, permeable paving and has been revised to include expanded planter beds. This approach increases planting opportunities whilst maintaining accessibility and permeability around the feature tree. Refer to drawing no. LD-200 of the updated Landscape Plans at <b>Appendix I</b>.</p> <p data-bbox="1200 1265 2033 1401">The proposed development will provide 59 trees for planting with a canopy cover of 36% of the site, which is considered appropriate for the proposed development. This canopy cover will cover a majority of the site that is not built upon as well as built form where feasible.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	7.3 Tree Offset Scheme of the Vegetation Management Guidelines	
<b>8. Flooding, stormwater drainage and car parking spaces</b>		
WCC-8.1	The attached submission includes comments requesting amendments and or/further information pertaining to flooding, stormwater drainage and car parking spaces. Conditions are provided at Attachment 3.	<p>Mecone have reviewed the conditions and have the following comments:</p> <ul style="list-style-type: none"> <li>• <b>Condition 1</b> - Recommend this condition is reworded to: 'The proponent shall pay to Council a monetary contribution equivalent to 2376.67 sqm of GFA for the purpose of providing affordable housing. The amount of the monetary contribution is determined by reference to the valuation report by Urbis dated 15 April 2025.'</li> <li>• <b>Condition 3</b> – Delete condition as Condition 2 will apply (7.11 Contributions)</li> <li>• <b>Condition 11</b> – Update wording to: 'Prior to the issue of the <i>relevant</i> Construction Certificate'.</li> <li>• <b>Condition 11(e)</b> – Delete condition as no awning is proposed.</li> <li>• <b>Condition 13</b> – Recommend this condition is reworded to: 'All measures contained in the flood risk management report by CEC dated 3 April 2025 shall form part of any Construction Certificate issued.'</li> <li>• <b>Condition 14</b> - Update wording to: 'Prior to the issue of the <i>relevant</i> Construction Certificate'.</li> <li>• <b>Condition 15</b> - Update wording to: 'Prior to the issue of the <i>relevant</i> Construction Certificate'.</li> <li>• <b>Condition 16</b> - Delete condition as no awning is proposed.</li> <li>• <b>Condition 25</b> – Delete the following from condition: "at all times".</li> <li>• <b>Condition 28</b> – Delete condition as overlap with damage deposit.</li> <li>• <b>Condition 42</b> – Delete condition as works are already covered by s7.11 Contributions.</li> </ul>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<ul style="list-style-type: none"> <li>• <b>Condition 43</b> – Delete condition as works are already covered by s7.11 Contributions.</li> <li>• <b>Condition 44</b> – Delete condition as works are already covered by s7.11 Contributions.</li> <li>• <b>Condition 53</b> – Delete condition as title does not match text.</li> <li>• <b>Condition 57</b> - Delete condition as title does not match text.</li> <li>• <b>Condition 64</b> - Delete condition as no awning is proposed.</li> </ul>
WCC-8.2	<p><b>Stormwater Management</b></p> <p>Based on hydrogeological assessment, the basement should be designed and constructed as a tanked structure. The stormwater management system requires redesign to address the issues identified above, and Council recommends application of conditions of consent to ensure the stormwater management and flood impacts are appropriately addressed as provided in Attachment 2.</p>	<p>The basement will be designed as tanked to prevent water ingress and address the issues raised.</p>
WCC-8.4	<p><b>Car parking space and bicycle requirements</b></p> <p>Parking spaces for accessible parking must be amended to comply with all relevant Australian Standards as outlined above. Council also recommends the inclusion of car share spaces to reduce overall parking demand, given the site's close proximity to the Chatswood transport hub, including train, Metro, and bus services. Additionally, provisions for electric vehicle (EV) charging should be incorporated into the development. Pedestrian access is proposed via McIntosh Street and Anderson Street; however, it is unclear whether a shared path for pedestrians and cyclists is proposed, or if a designated entry point for cyclists has been identified. Further clarification is required to ensure safe and efficient access for all users.</p> <p>Bicycle storage lockers and rails are to be provided in accordance with the requirements of Part F of the Willoughby</p>	<p><b>Disabled parking</b></p> <p>All disabled parking spaces include a 2.4m wide car parking space and an adjoining 2.4m wide shared area. It is considered that the design accords with all relevant Australian Standards.</p> <p><b>Car Share</b></p> <p>The proposal includes sufficient private parking and as such there is no anticipated need for car share spaces within the development.</p> <p><b>EV Capacity</b></p> <p>The development will comply with all current National Construction Code (NCC) requirements in relation to Electric Vehicle charging. If required, a condition of consent could be agreed to this effect.</p> <p><b>Bicycle Requirements</b></p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>DCP. Rails are to be located in a visible location, where they are visible for visitors.</p>	<p>As noted in Table 16 of the TIA, the following visitor bicycle parking spaces are required:</p> <ul style="list-style-type: none"> <li>• Gymnasium – 1 visitor space;</li> <li>• Food and Beverage – 1 visitor space; and</li> <li>• Residential – 26 visitor spaces.</li> </ul> <p>A total of 28 visitor bicycle parking spaces are required with 30 provided in three locations within Basement 02 as shown below.</p>  <p><b>Figure 5: Basement 02 Plan (indicating bicycle spaces)</b>  Source: Stantec</p> <p>The Willoughby DCP states that “Class C bicycle parking facilities are intended for use by visitors to the building and must be located in visible publicly accessible locations.” These spaces are visible and publicly accessible. The visitor parking locations are within close proximity to the residential and non-residential lobby entrances and CCTV cameras could be installed to assist with security if required.</p> <p>If considered necessary, appropriate wayfinding signage to assist visitors locating the bike parking could be provided within the building.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		While these locations are considered satisfactory, if there are better locations considered more suitable by DPHI, a consent condition requiring their relocation to ground level or another suitable location could be provided.
<b>9. Waste management issues</b>		
WCC-9	<p>Conditions are provided at Attachment 3.</p> <p>The proposed mixed-use development is subject to the requirements of the Willoughby DCP 2023 and the NSROC Waste Management Technical Guide (2018), given its classification as a high-rise residential flat building. Key issues remain with temporary bin holding rooms, door widths, and waste collection frequency. The OWMP proposes once-weekly residential general waste collection, whereas Council requires twice weekly. Further clarification is also needed on the commercial tenancy types and the inclusion of organics bins for non-residential uses. Council requires additional detail and amendments to demonstrate full compliance with NSROC and AS2890.2:2018 for waste vehicle access, vertical and side clearances, and swept paths. In particular, the development has been designed to accommodate Council's heavy rigid vehicle (HRV) waste collection, with access via Cambridge Lane subject to minor kerb and sign adjustments. While vertical clearance of 4.5m appears to be provided, the traffic plan must clearly confirm full compliance with AS2890.2:2018 along the entire swept path, including minimum rear clearance of 2m for bin loading and 0.5m side clearance for driver movement. A clear and comprehensive statement addressing all access and clearance requirements is required to confirm suitability for Council's HRV waste collection vehicles.</p>	<p>The waste consultant has amended the OWMP (<b>Appendix Y</b>) to reflect the FOGO bins in the waste calculations. Please refer to section 6, "Commercial and Retail Waste Management" of the OWMP. The Architectural Plans (<b>Appendix F</b>) have also been amended to reflect the FOGO bins in the commercial/retail waste room. Refer to Drawing Number A-DA-10-04-B, Rev B – Basement Plan.</p> <p>The architectural basement plan has been amended to relocate the bin residential holding room and move the bin commercial/retail room further away. Refer to Drawing Number A-DA-10-04-B, Rev B – Basement Plan. The waste consultant has amended the OWMP, and Table 10 reflects the minimum doorway of 2.5m. The specified maximum gradient of 1:14 for manual bin handling is equivalent to approximately 7% and is therefore consistent with the NSROC guideline, which allows a maximum grade of 7% for waste movement routes.</p> <p>Further, the waste consultant has amended the OWMP to reflect the following:</p> <ul style="list-style-type: none"> <li>• Inclusion of a twice weekly collection for general waste. Refer to sections 5.1 and 5.2 of the OWMP.</li> <li>• Specify the use of 1,100L bins for both general waste and recycling streams.</li> <li>• Inclusion of 240L bins on each level, positioned adjacent to the waste chute, for the disposal of items that cannot be accommodated within the chute system. Each waste disposal</li> </ul>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<p>point is located within 30 metres of all residential units. Refer to Drawing Number A-DA-10-10-B, Rev B – Levels 6 to 12 as a representative example; similar bin arrangements are shown on other applicable floor plans.</p> <ul style="list-style-type: none"> <li>• Inclusion of provisions for access by the Council waste collection vehicle and accounts for the turning requirements of a Heavy Rigid Vehicle (HRV). Additionally, a 2-metre loading area is provided at the rear of the waste truck to facilitate the servicing of the bulk bins. Refer to Drawing Number A-DA-10-04-B, Rev B – Basement Plan.</li> </ul> <p>The architectural plans have been amended and include the waste areas, drainage, taps, aisle widths of 2.5m. Refer to Drawing Number A-DA-10-04-B, Rev B – Basement Plan</p>
<b>10. Building sustainability</b>		
WCC-10	<p>Council recently exhibited amendments to the WDCP from 17 March to 22 May 2025. These proposed amendments provide clarity on Council expectations regarding sustainability standards for new development across the Chatswood CBD. These amendments will be reported to the June 2025 Council meeting for finalisation.</p> <p>The exhibited amendments require development in the MU1 Mixed Use Zone to achieve a minimum 5 star GBCA building rating. Council seeks a clear commitment consistent with the exhibited WDCP amendment (soon to be finalised) for a minimum 5 star GBCA rating or the equivalent for the proposed SSDA development.</p> <p>Council seeks for any approval to contain conditions of consent requiring a 5 star GBCA rating or equivalent.</p>	<p>An ESD Statement has been prepared at <b>Appendix BB</b>, which confirms that the proposal incorporates a number of measures in response to the ESD principles at section 193 of the EP&amp;A Regulation 2021.</p> <p>The proposed development includes numerous features typical of a Green Star rated building. Some of the initiatives being considered in design include:</p> <ul style="list-style-type: none"> <li>• Provision of amenities to allow for separation of multiple waste streams in accordance with OWMP;</li> <li>• Compliance with AS 1668 &amp; Apartment Design Guidelines regarding natural ventilation, helping reduce reliance on air conditioning during warmer temperatures;</li> <li>• High acoustic amenity;</li> <li>• Material specification that contribute to improved indoor air quality;</li> </ul>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
		<ul style="list-style-type: none"> <li>• High solar reflectance index (SRI) of materials viewed from above, helping reduce ambient air temperature across the site;</li> <li>• Provision of a Sustainable Transport Plan;</li> <li>• Adoption of native plant species to a large portion of landscaping;</li> <li>• Consideration of first nation principles in design;</li> <li>• Responsible construction practices including sustainability training to site workers and diversion of construction and demolition waste from landfill;</li> <li>• BASIX Energy Score of 60 and Water Score of 40 through the provision of: <ul style="list-style-type: none"> <li>○ Energy and Water efficient fixtures and appliances;</li> <li>○ Provision of a rainwater tank that will be used for irrigation purposes;</li> <li>○ High performance building fabric and extensive shading providing a high level of thermal comfort and energy efficiency; &amp;</li> <li>○ Solar PV system.</li> </ul> </li> </ul> <p>The development demonstrates that Planning Secretary's Environmental Assessment Requirements, Item 15 will be exceeded whilst aligning with Section 193 of the EP&amp;A regulation 2021 and achieving Willoughby DCP objectives through the adoption of sustainable design features in line with the Green Star rating tool.</p>
<b>11. Missing Information</b>		
WCC-11	<p>The following information has been identified in the proponent's Environmental Impact Statement but has not been made available as part of the exhibition:</p> <ul style="list-style-type: none"> <li>• Appendix B – Detailed Maps and Plans</li> </ul>	<p>Appendix B was provided at lodgement of the EIS and is available online on the major projects portal for SSD -74670720.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
<b>12. Design Excellence Process</b>		
WCC-12	<p>Council maintains that a Design Integrity Panel (DIP) conduct a review and is necessary under the Willoughby Design Excellence Strategy, which reinforces the need for such a process to ensure high-quality, innovative, and contextually appropriate design outcomes in strategic centres like the Chatswood CBD. Waiving the requirement would undermine the integrity of the planning framework and set a poor precedent.</p> <p>The integrity review process was developed to ensure design quality continues through design development, construction drawings and into physical completion. The Strategy highlights the importance of the review process in achieving high quality built form outcomes, encouraging innovation, and ensuring developments make a positive contribution to the public domain.</p>	<p>The scheme has undergone an extensive design excellence process, in accordance with The Design excellence strategy endorsed by Council (<b>Appendix BB</b>). A design excellence competition was concluded on 12 July 2024 when the jury endorsed Carter Williamson scheme. As part of this process the jury extended this endorsement to the design alternative which includes infill affordable housing uplift. As such, no bridging design excellence strategy is required for this site.</p> <p>The Design excellence strategy endorsed by Council sets out that the DIP will reconvene to review the design at the following stages:</p> <ul style="list-style-type: none"> <li>• <i>Prior to the lodgement of any DA/SSDA, providing sufficient time to allow for meaningful input by the DIP on design development.</i></li> <li>• <i>During the assessment of the DA/SSDA as deemed necessary by the Consent Authority.</i></li> <li>• <i>Prior to the submission of any significant design modifications to the Development Consent.</i></li> </ul> <p>On 7 May 2025 Mecone contacted the DIP with a copy of the lodgement plans highlighting their consistency with the version reviewed as part of the design competition.</p> <p>It is not considered that in addressing submissions there has been any significant design modifications that would warrant a review of the proposal by the DIP.</p> <p>The proposal still maintains the potential to achieve design excellence, in accordance with the Architectural Design Competition Report submitted with the lodgement package as <b>Appendix AK</b>.</p>
<b>13. Non-residential floor space</b>		

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
WCC-13	<p>The SSDA proposes 16.9% non-residential floor space over the whole proposed development. In Council's view, 17% non-residential minimum floor space requirement is entirely achievable, noting that Council planning controls permit non-residential uses within the tower form and in the podium.</p> <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>	<p>The proposal includes 4,517.3m<sup>2</sup> of non-residential floorspace. Which is just 16.6m<sup>2</sup> (0.1%) short of being fully compliant with clause 6.25 of the LEP, for a scheme which complies with LEP clauses 4.3 (Height of buildings) and 4.4 (Floor space ratio).</p> <p>With a standard job density assumption of at least 30-40m<sup>2</sup> for retail use, meeting the 17% would not add sufficient floor space to generate additional employment. Therefore, provision of 16.9% non-residential floor space as opposed to 17% will not prevent the delivery of employment opportunity.</p>

### 4.3 Public Agencies

Table 5 sets out a response to each issue raised within submissions received by public agencies.

Table 5: Public Agency Submission & Responses

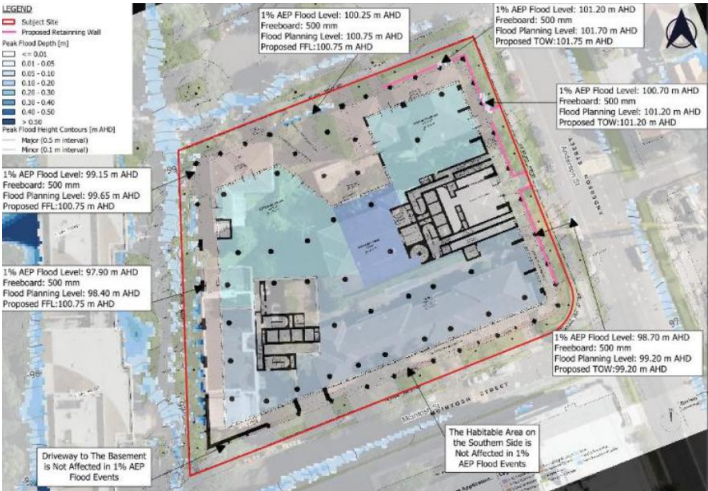
ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
<b>Sydney Metro</b>		
SM-1	<p>Following this review, Sydney Metro advises that it is not in a position to make a decision until the additional information outlined below is provided for Sydney Metro's further review:</p> <p>a) Survey Plan: Verified by a registered surveyor to provide confirmation of the sites location being over 25m from the Metro Corridor.</p>	It has been confirmed by the surveyor that the sites' location is over 25m from the Metro Corridor.
SM-2	b) Shoring Design: To confirm there will be no ground anchors to be installed within 2nd reserve of metro corridor. If anchors to be installed extends into 2nd reserve, the developer needs to confirm the design	The reserves modelling was requested from Sydney Metro on 18 June 2025. At the time of writing we are still awaiting

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	has met the requirement of at grade guidelines (Section 6.5) which is extracted below:	modelling from Sydney Metro to be able to respond to these comments.  Once this modelling is received a comprehensive response to this item can be provided.
<b>Heritage NSW</b>		
HNSW-1	Heritage NSW provisionally agrees with the proposed management recommendations (Section 9 of ACHAR) however, we recommend that Planning request the following evidence from the applicant prior to project approval to ensure that the assessment and Aboriginal community consultation has been completed in substantial compliance with the guidelines:  a) Please provide a copy of the Aboriginal community consultation log and all consultation documentation including: i. Evidence that the Stage 1 letter requesting registration of interest in the project was sent out to all potential Aboriginal cultural heritage knowledge holders (groups or individuals) who were identified during the stage 1 Agency notification process.	This evidence has been added to the ACHAR at Appendix B – Consultation Records.
	ii. Evidence that the Stage 2/3 Project information and assessment methodology was provided to all registered Aboriginal parties (RAPs).	This evidence has been added to the ACHAR at Appendix B – Consultation Records.
	iii. Evidence that the Stage 4 draft ACHAR and Draft Archaeological Research Design an Methodology (ARDM) was provided to all RAPs.	This evidence has been added to the ACHAR at Appendix B – Consultation Records.
	iv. Copies of all RAP responses received in relation to the above consultation.	As stated in Section 2.3 of the ACHAR:

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>On this basis that the above comment is adequately addressed, Heritage NSW has provided recommendations in relation to Draft Conditions of Consent, as included in Attachment A.</p>	<p><i>“A copy of the draft ACHAR was sent to the RAPs by email on 6 November 2024, requesting feedback by 4 December 2024. No feedback on the draft ACHAR was received.”</i></p> <p>Noted.</p>
<b>Transport for NSW (TfNSW)</b>		
TfNSW-1	<p>TfNSW has reviewed the submitted application and raises no objection as the proposed development is unlikely to have a significant impact on the state classified road network (i.e. Pacific Highway).</p> <p>TfNSW notes that all vehicle access is proposed via McIntosh Street, which is a local road under the care and control of Council as the relevant road authority. As such, no concurrence from TfNSW will be required under Section 138 of the Roads Act 1993 for the works that are proposed as part of this development within McIntosh Street.</p>	Noted.
<b>Sydney Trains</b>		
ST-1	<p>We have reviewed the proposal and advise that in order to protect rail land, assets, operations, and to ensure a safe and reliable rail service, it is requested that the Department consider imposing the deferred commencement conditions as listed in Attachment A and operational conditions as listed in Attachment B. It is requested that these conditions remain as worded and are not amended without consultation with TfNSW (as Rail Authority).</p> <p>Where additional information is provided, including as part of any Response to Submissions or where any amendments are made to the proposal, we request notification from the Department in the event these changes may impact the outcome of this letter.</p>	We note the deferred commencement condition recommended by Sydney Trains, the proponent is working through the matters with Sydney Trains directly to avoid the need for a deferred commencement consent.

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
<b>Air Services Australia</b>		
ASA-1	At this time, Airservices has no comments on the proposed development near Sydney Airport. However, should the development and any associated cranes infringe on the Obstacle Limitation Surface (OLS) of Sydney Airport, this would typically trigger an assessment of potential impacts on Procedure for Air Navigation Systems Operation (PANS-OPS) or Communication, Navigation, and Surveillance (CNS).	Noted.
<b>Civil Aviation Safety Authority (CASA)</b>		
CASA-1	The proposed buildings will be outside the lateral limit of the Obstacle Limitation Surfaces for Sydney Airport and will not need to be assessed under the Airports (Protection of Airspace) Regulations 1996. The taller building is over 100m high above ground level and therefore must be advised to CASA under Civil Aviation Safety Regulation 139.165. (in Plain English structure proposals 100m+ above ground level must be advised to CASA). This requirement can be considered to be complete; done; provided that there is no height increase. Notwithstanding that CASA is not an Approval Authority as such, CASA has no objections to the development proposal. CASA has determined that the proposed buildings will not be hazards to aircraft operations.	Noted.
<b>Fire + Rescue NSW</b>		
FRNSW-1	FRNSW have reviewed the EIS. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation at this stage.	Noted.
<b>Ausgrid</b>		
	Ausgrid requires that due consideration be given to the compatibility of proposed development with existing Ausgrid infrastructure, particularly	Noted.

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
AG-1	<p>in relation to risks of electrocution, fire risks, Electric &amp; Magnetic Fields (EMFs), noise, visual amenity and other matters that may impact on Ausgrid or the development.</p> <p>Ausgrid has reviewed “Appendix F Architectural Plans” advise 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</p>	
<b>DCCEW Water Group</b>		
DCCEW-1	<p>NSW DCCEW Water group has reviewed the EIS and has a recommendation regarding water supply, take and licensing post approval:</p> <p>The Department of Planning, Housing and Infrastructure requests the proponent to ensure the requirements to claim an exemption for a Water Access Licence (WAL) for groundwater take under the <i>Water Management (General) Regulation 2018</i> are addressed.</p>	<p>A Dewatering Management Plan (DMP) has been provided at <b>Appendix AV</b>. The DMP confirms that the site complies with the condition of exemption for the WAL, since the expected dewatering volume is less than 3 ML.</p>
<b>Sydney Water Corporation</b>		
SWC-1	<p>Our preliminary assessment indicates that water and wastewater servicing should be available for the proposed development.</p> <p>A compliance certificate must be obtained from Sydney Water, under Section 73 of the Sydney Water Act 1994 prior to the issue of an Occupation/Subdivision Certificate.</p> <p>Recommended development conditions can be found in Attachment 1.</p>	Noted.
<b>Conservation Programs, Heritage and Regulation Group (CPHR)</b>		
CPHR-1	<p><u>The development does not meet the flood planning requirements</u></p> <p>Many of the proposed floor levels are below the flood planning level developed in the FIRA. Insufficient detail is provided regarding risk</p>	<p>A Flood Letter has been provided at <b>Appendix BA</b> responding to the concerns raised.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>mitigation to ensure overland flow does not enter the building. Assertions made in the FIRA are misleading with respect to compliance with required flood planning levels. For example, Table 6 of the FIRA copied below indicates compliance with floor levels whereas the architectural plans show commercial spaces at 99.25 m AHD finished floor levels for Day Street.</p> <p>Floor levels must comply with flood planning levels or adequate information must be provided to prove that an equivalent level of protection is provided. Flood planning levels and finished floor levels should be clearly identified on plan at each entry point to the building.</p>	<p>A Flood Planning Level and Proposed Finished Floor Level map is provided to explain how the proposed building achieves the flood planning level by the retaining wall and finished floor level.</p>  <p><b>Figure 6: Proposed Finished Floor Level Plan</b> Source: CEC</p> <p>The updated Flood Impact Assessment Report (<b>FIRA</b>) provided at <b>Appendix W</b> includes Figures 11 and 12 which highlight the retaining wall levels and adjacent flood levels to demonstrate how the proposed development is not impacted by the surrounding flooding.</p>
CPHR-2	<p><u>The FIRA indicates no offsite impacts</u></p> <p>Flood afflux mapping indicates that no off-site impacts occur because of the development however increased velocity is shown in post development mapping which is more severe in the climate change mapping. It is unclear why increased velocity would occur without increased depth in off-site areas. There is no explanation in the FIRA</p>	<p>The last paragraph of the updated FIRA provides information about the flood level and velocity afflux between pre- and post-development in both 1% AEP flood and Climate Change based on the flood maps of Appendix A7-A10 and B7-10.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>regarding why this has occurred and what impact may result. Mitigation strategies are required to limit off site impacts. The flood mapping also uses a similar colour green for afflux to the underlying landscape colour which makes maps difficult to read.</p> <p>Further detail is required regarding any off-site changes in flood behaviour – this applies to roadways, pathways and other public property. Off-site assessment and assertions of no impact are not restricted to impact on private property. Colours with adequate contrast should be used in flood afflux mapping to enable review. Appropriate mitigation is to be detailed.</p>	
CPHR-3	<p><u>The FIRA refers to mitigation which is not detailed in the FIRA or in other plans</u></p> <p>The FIRA refers to fenced storage areas, preserved flow paths and retaining walls used to achieve required flood protection levels and reduce off site impacts. These are not detailed in the FIRA and their location and purpose is either not present or not clear on architectural, water cycle management or landscaping plans.</p> <p>Full details of mitigation strategies are required in the FIRA. The mitigation strategies are to be clearly shown on plan together with required levels, gradients and flow directions to convey flow through the development. Architectural, water cycle management and landscaping plans are to be updated to clearly indicate flood management structures to ensure consistency and achievement of flood management objectives.</p>	<p>The updated FIRA includes Section 7.4 which highlights the mitigation measures for flooding. This is further supported by Figures 11, 12, 14, 15, 16 and 17 in the FIRA. An evacuation plan is also provided in Section 7.3.</p>
CPHR-4	<p><u>Levels shown on the landscaping and architectural plans do not protect the building from ingress of water</u></p> <p>Landscaping and architectural plans show finished floor levels below flood planning level, podium (outdoor) levels at the same level as indoor levels with no fall away from the building and retaining walls restricting safe overland flow away from the building. This is not in</p>	<p>The updated FIRA includes Figures 11 and 12 which highlight the retaining wall levels and adjacent flood levels to demonstrate how the proposed development is not impacted by the surrounding flooding.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>accordance with good design practice or with the requirements of the National Construction Code (NCC).</p> <p>The NCC requires that drainage be provided for the 1 in 20 event with the 1 in 100 event being prevented from entering buildings. Parts of the outdoor area/landscaping are required to safely convey off-site overland flow around the building and it is unclear how this is achieved. Grated drains are shown at building entries and are not a satisfactory manner of protecting a building.</p> <p>Design levels and falls are to be reviewed to ensure compliance with the minimum freeboard and drainage requirements of the National Construction Code and to provide additional freeboard where overland flows are required to be conveyed around the building. This will require assessment of flow depths and design of flow paths.</p>	
CPHR-5	<p><u>Protection of the basement is not clear</u></p> <p>The building will have 7 stories of basement. The basement ramp appears to ramp up before ramping down however the FIRA makes no comment on whether this is adequate to protect the basement from on site or off-site flows. Reliance on retaining walls to prevent overland flow entry into upper and lower ground floors also provides potential entry points for water into the basement. No mention is made regarding protection of service ducts or lift shafts to prevent ingress of water into the basement. The proposed pump system should be relied upon for seepage water only and should not be used to deal with surface water entry.</p> <p>Details are required regarding how the basement will be protected from entry of water to ensure that essential services are not damaged. This is of additional importance if shelter in place is being considered for this development.</p>	<p>Figures 11 and 12 of the updated FIRA show that there is no flooding around the driveway entrance. The closest PMF level of RL 95.23 has been considered in the driveway crest level of RL 95.25 to ensure there is no potential for water to enter the basement.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
CPHR-6	<p><u>The provided Flood Emergency response plan (FERP) is not clear</u></p> <p>The flood emergency response plan is very lengthy and includes monitoring of water levels in streets which is unlikely to be a reasonable or viable measure. Risk mitigation measures in the FERP such as sealing doorways and relocating hazardous goods are unlikely to be achievable during a flash flood event. The SES or 000 also should not be contacted for advice during a flood event unless the situation is life threatening. The FIRA indicates that the site is impacted by H1 (low hazard) flows in most streets which could be used for access and that evacuation or shelter in place may be possible.</p> <p>The FERP should be reviewed following review of the FIRA. If both evacuation and shelter in place remain very low risk, up to and including the PMF event, a FERP is not required, and this should be clearly articulated in the FIRA. If higher risks exist, compliance with the requirements in DPHI Shelter in Place guideline should be</p>	<p>As per CPHR's recommendation, the FIRA has been updated to explain the flood hazard category (refer to section 7.5) and as such the FERP has been removed.</p>
CPHR-7	<p><u>Flood compatible building requirements and damage mitigation strategies are not well defined</u></p> <p>The FIRA (section 6.3) indicates that flood compatible building materials should be used, and the building designed to resist flood loads. This is an important measure to reduce losses and damages however should not be instead of flood mitigation or compliance with required flood planning levels. Elevating power points/air conditioning units to achieve required flood level in some areas may mean these would be up to 1.5 m above floor level. The viability of these risk mitigation strategies should be reviewed.</p> <p>Improvement of flood mitigation strategies and design floor levels should occur to reduce the reliance on flood compatible building components to protect the building in the design flood event.</p>	<p>The need for flood-compatible materials has been referenced in section 7.4 of the FIRA. Measures related to the power points have been removed as further clarity has been provided in regard to the driveway and building being protected from potential water ingress</p>
CPHR-8	<p><u>The location of services has not been considered</u></p>	<p>An Arboricultural Letter has been provided at <b>Appendix AZ</b>.</p>

ITEM REFERENCE	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>The BDAR offsets have been worked out in accordance with the retention of 8 trees on the site. However, the Arboricultural Impact Assessment (AIA) states that services have not yet been located and this may affect the capacity to retain these trees.</p> <ul style="list-style-type: none"> <li>• The proponent could: <ul style="list-style-type: none"> <li>○ assume the complete removal of trees in locations where services could be located and the BDAR updated to reflect any increase in tree removal, or</li> <li>○ a services plan could be provided to the arborist to be able to understand and condition the impacts to trees. This alternative could necessitate updates to the BDAR offsets.</li> </ul> </li> <li>• If services are to be located outside of the tree protection zones (TPZs) of trees to be retained, then tree conditions as per the AIA (section 8-10) should be include in any consent. The offset requirements within the BDAR should also be provided as a condition of consent.</li> </ul>	<p>The Stormwater Layout Plan (Capital Engineering Consultants dated 01.04.2025 Rev B) shows that all stormwater services will be run within the site boundaries (aside from a 450mm diameter RPC pipe to the existing kerb inlet pit outside of the site- of which this will require the removal of T43- which has already been accounted for within the AIA report.)</p> <p>Due to existing retaining block and brick walls located on the boundary, these structural features will have modified the typical root spread of trees and are expected to have kept root growth outside of the site. Any trees outside of the site will not be impacted by the Stormwater Layout Plans, and therefore Trees T8, T28, T29, T31, T35, T39, T40, T41 (all located outside of the site) can be retained.</p> <p>Whilst no other service plans are available at this stage of the development process, it is envisaged that all other services (for example but not limited to- electrical, gas, communications and potable water) will not impact the trees in question as there is adequate room for the provision of these services to be constructed outside of the site and brought into the site whilst avoiding any retained Trees TPZs</p>

## 4.4 Public Submissions

**Table 6** sets out a response to each issue raised within the **general public** submissions.

**Table 6: General Public Submissions & Responses**

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE
<p><b>Traffic and parking</b></p>	<p>Adding more high-density buildings will exacerbate issues such as congested traffic, public transport, schools, parks, healthcare facilities and other essential services.</p>	<p>The proposed development is wholly consistent with relevant State and local strategic plans, complying with the applicable provisions of WLEP 2012.</p> <p>It contributes to much-needed housing supply, supporting the NSW Government's Housing Accord targets and addressing local housing needs by providing a significant proportion (15%) of affordable housing.</p> <p>The development includes commercial and retail spaces within the podium levels, providing services to the community and creating potential job opportunities for the LGA. A comprehensive assessment in Section 6 of the EIS confirms that there will be no adverse environmental impacts on nearby land uses, with appropriate mitigation measures where necessary.</p> <p>Overall, the site will facilitate the orderly and economic use and development of the land.</p>
	<p>This project has car park spaces of over 490 and the entry will be from McIntosh Street, which is a narrow one-way street. The only way to enter McIntosh Street is from Cambridge Lane. A little laneway already use by residents of 1 Cambridge Lane.</p>	<p>Parking matters have been addressed under DPHI-1.</p>
	<p>The proposal includes 494 car parking spaces, which exceeds the council's Development Control Plan (DCP) maximum for the Chatswood CBD area . This overprovision of parking may encourage higher car usage, exacerbating traffic congestion and undermining efforts to promote public transport and sustainable mobility</p>	

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE
	Increased traffic will affect the safety of students and create more traffic jams.	<p>The scheme has been designed to ensure safety of all who interact with the building and site and harmony between the proposal and existing streetscape.</p> <p>Any s7.11 contributions arising from this development would facilitate the delivery of public domain improvements immediately surrounding the site.</p>
	Traffic congestion and increased resident's safety risk - Cambridge Lane is very narrow, additional traffic to access McIntosh Street could block entry to/exit from 1 Cambridge Lane. This will materially increase the resident's safety risk in case of emergency in case of fire or ambulance access.	We acknowledge the nature of Cambridge Lane which has been extensively reviewed by the traffic consultant. The proposal has been designed to be safe with existing streetscape and we are anticipating section 7.11 contributions would facilitate the necessary upgrades to the immediate surrounding public domain.
<b>Height and Overshadowing</b>	The height of the buildings will cast a shadow onto the existing buildings and communal gardens in the Pacific Place complex, and block the easterly sun and lookout from existing residents of Pacific Place.	As shown in <b>Appendix F</b> , the proposal will only overshadow the Pacific Place Complex on June 21 between 9am and 11am. Notwithstanding this, it will only overshadow parts of the complex at any time thus ensuring they still receive the recommended amount of solar access.
	The towers will dominate the skyline, overshadow surrounding buildings, and reduce privacy for nearby residents.	<p>Height and scale have been addressed at WCC-1.</p> <p>It is noted that the sites to the immediate north and south of the subject site are also subject to development under the infill affordable housing provisions, so the proposed development presents a consistent approach to future development along Anderson Street and McIntosh Street.</p>
	The proposed development includes a substantial increase from the current maximum building height of 12 meters to 90 meters - this significant increase in height will likely result in considerable overshadowing, particularly during the morning hours, leading to a loss of natural sunlight. This not only affects the comfort and	The increased maximum height of building was endorsed and approved via amendment no.34 to the Willoughby LEP and is aligned with the desired future character of the Chatswood CBD.

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE
	wellbeing of residents but also has potential implications for energy consumption and indoor environmental quality.	
	The building's 117m height is beyond the 90m control.	<p>The proposal includes 15% infill affordable housing and accordingly, it seeks to make use of an additional 30% increase to FSR, and to the height of buildings control.</p> <p>Based on the above, the following calculation has been made:</p> <ul style="list-style-type: none"> <li>LEP Height of Buildings control: 90m Maximum Permissible Height: 90m x 130% = 117m</li> </ul> <p>The proposed development is fully compliant with this maximum height of buildings control.</p>
	The dominating and bulky buildings will have a great impact on the water views including the ocean at North Head from my apartment and these views would be totally obscured by the tall buildings.	<p>View Impact is addressed in DPHI-7.</p> <p>Additionally, the slender nature of the towers which exhibit gaps in between towers allow for retention of several existing views and vistas such as Manly Beach, North Head, Sydney Harbour and Sydney Harbour National Park.</p> <p>As such, view sharing is achieved in line with the Views Planning Principle of - Tenacity Consulting v Waringah [2004] NSWLEC 140. Refer to response to DPHI-7</p>
	The buildings will affect the privacy of surrounding residents as they will tower over people's gardens, balconies and the swimming pool area of Altura and Epica.	The proposal retains the building separation distances in the competition winning scheme, which are consistent with the design criteria in Objective 3F-1 of the ADG. Adequate separation has been provided between the buildings. Blade walls to balconies have been provided where required to enhance privacy. This is demonstrated in the Architectural Plans at <b>Appendix F</b> .
<b>Congestion and strain on local services</b>	On the weekends, Anderson Street is always blocked with long queues of cars wanting to go into Westfield Shopping Centre.	We acknowledge the busy nature of Chatswood CBD. The Traffic Impact Assessment at <b>Appendix O</b> of the original

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE	
		<p>submission confirms that surrounding intersections will continue to operate sufficiently as a result of the development.</p> <p>Specific analysis of traffic issues arising from commercial shopping centres this is beyond the scope of this proposal.</p>	
<p><b>Non-compliance</b></p>	<p>The LEP for this mixed-use site requires at least 17% of the total GFA to be allocated to non-residential use. The proposed development falls well short of this, at around 13%. The justification offered is unconvincing, relying on the pre-bonus FSR. Further work is required to come up with a development that complies.</p>	<p>A Clause 4.6 variation has been provided at <b>Appendix AG</b> of the original submission to demonstrate that non-compliance with this development standard adequately meets the relevant legal tests, and that the proposed development meets the objectives of the controls of the MU1 Mixed use land use zone under the WLEP and vision of the future desired character of Chatswood CBD.</p>	
	<p>The variation to Clause 6.25 should not be supported. The proposal fails to adequately demonstrate that strict compliance with the standard is either unreasonable or unnecessary pursuant to Clause 4.6 and does not provide sufficient environmental planning grounds to justify the departure from this control. The proposal should therefore be amended to achieve a higher level of compliance with Clause 6.25 of LEP 2012, to create a more vibrant community by integrating living and working, as well as retail spaces.</p>		
	<p>The proposal sets out the relevant SEPP requirements in this area, and then provides certain solar access statistics. It's unclear whether the proposal complies with the minimum 3 hrs direct solar access in mid winter requirement. The numbers quoted in the proposal do not address this specific requirement. Instead, they quote other measures which would appear to suggest that the proposal is non-compliant.</p>		<p>A detailed shadow analysis has been undertaken at hourly intervals by Carter Williamson. The overall building envelope, height and massing were established by the design excellence competition process.</p> <p>Careful consideration has been given to the Victoria Avenue and the Concourse area between midday and 2pm in mid-winter, in accordance with Clause 6.15 of the LEP. The resulting shadowing impact from the proposed development is commensurate with that anticipated under the Chatswood CBD Strategy and is not anticipated to result in any unacceptable impacts on the surrounding area.</p>
	<p>The argument presented for being unable to meet the minimum overshadowing requirement for residents of 1 Day Street is unsatisfactory.</p>		
	<p>I object to the removal of trees T3 and T5. T3 is a mature brushbox, approx. 18m tall. This is a native, around 1 metre from the site</p>	<p>The removal of trees T3 and T5 is necessary to facilitate the redevelopment of the site. The submitted Arborist report</p>	

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE
<b>Environmental issues</b>	boundary. T5 is a lemon scented gum, around 25m tall. Also a mature native, and also on the edge of the site boundary. Both trees appear to be in excellent condition. The reason given for removing these two significant trees is "the tree is not retainable with the current proposal". The basement should be redesigned so that these trees are allowed to remain and become a feature of the southern side of the site.	<b>(Appendix K)</b> identifies that both these trees would experience a major TPZ encroachment and it would be necessary to remove and replace them in order to deliver the optimal outcome for the site.
	The construction and increased traffic may threaten local wildlife and green spaces.	Construction impacts will be managed in accordance with the submitted NVIA at <b>Appendix S</b> and Demolition and Construction Waste management plan at <b>Appendix Z</b> .
	The project involves demolition of existing buildings, vegetation clearing, and bulk earthworks—posing environmental risks, noise, dust, and long-term disruption to local amenity.	The indicative project timeframe is as follows: <ul style="list-style-type: none"> <li>• SSDA Approval: Q4 2025</li> <li>• Contractor engagement: H1 2026</li> <li>• Contractor start: H1 2027</li> <li>• Construction finish: H1 2030</li> </ul>
	Many established trees (47 trees in total) will need to be removed when established trees are needed for shade and temperature control.	Tree removal is required to allow for development on the site. Of the 47 trees subject to removal, 20 have a low retention value. It is proposed that 59 trees be planted on the site to compensate for the loss in trees. This will account for a tree canopy cover of 35% on the site.
	Chatswood being on the ridge line is quite a windy area and these 2 buildings will increase the wind tunnel effect significantly.	Refer to response to DPHI-8.  Windtech has confirmed that the proposed development is unlikely to have any adverse impact on the Pacific Place communal open space, and private balconies of B2E, Epica and Cambridge buildings, assuming the existing street vegetation is retained.
<b>Nature of proposal</b>	The Willoughby LEP calls for greater use of public through-site links. This proposal appears to ignore that requirement. The proposal needs to be updated to include a north-south and an east-west public	The proposal was endorsed by the jury during the design excellence process and considered to be capable of delivering design excellence. It should be noted that other schemes

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE
	links. If this is not possible, the proposal should address the matter at least.	<p>contemplated as part of the design competition process were not selected – with specific concerns raised around the design quality and safety of providing through-site links to a site with such a large change in levels.</p> <p>The existing pedestrian link running north-south on the western side of the site is not encroached as a result of the proposed development.</p> <p>An additional through-site link running east-west through the site would result in a sub-optimal design outcome and be inconsistent with the CBD strategy.</p>
	The scale and design of the development seem out of place in our neighbourhood, potentially affecting the area's charm and appeal.	The proposal is fully compliant with strategic and statutory planning provisions for the site.
<b>Changed neighbourhood character</b>	Affordable housing needs to be cancelled because it will introduce various social problems into a traditionally safe and family-oriented community.	The proposal is highly aligned with the desired future character of Chatswood CBD under Willoughby Council's CBD Strategy (Chatswood CBD Planning and Urban Design Strategy 2036), which aims to provide capacity for future growth and employment, achieve exceptional design and a distinctive, resilient and vibrant CBD
	The proposed development's scale and density are inconsistent with the existing built environment and may set a precedent for future developments that further strain local infrastructure and services. This could lead to a decline in the quality of life for current residents and alter the community's character irreversibly.	
<b>Disturbance of local amenity</b>	The scale of the proposed development, including excavation for a seven-level basement and construction of high-rise towers, will inevitably lead to prolonged construction activities. This raises concerns about noise pollution, dust, and general environmental disruption over an extended period. Such disturbances can significantly impact the health and quality of life of nearby residents, particularly vulnerable groups such as the elderly, children, and those with health conditions.	Conditions of consent will be enforced to control construction impact.

CATEGORY	SUMMARY OF ISSUE RAISED	RESPONSE
	<p>Noise and disturbance – the proposed Tower at 3 McIntosh Street is too close to surrounding buildings (1 Cambridge Ln) and pedestrian area, only 3- 4.5m. The north-east corner of 1 Cambridge Lane is already too noisy. The proposed Tower height (with many new apartments/balconies) will further increase the noise and disturbance level to residents living in 1 Cambridge Lane.</p>	<p>The proposed development provides at least 12m separation between the McIntosh building and 1 Cambridge Lane which is compliant with Section 3F of the ADG.</p> <p>Given this distance, this will also provide significant acoustic privacy.</p>
	<p>Excessive noise level at the corner of Cambridge Lane and McIntosh Street - the noise will impact the residents living at the north-east corner of 1 Cambridge Lane. This area is already very noisy, particularly in the morning. Additional noise will materially impact residents' health and wellbeing.</p>	
	<p>Currently, there is no assessment within the Pedestrian Wind Environment Assessment to demonstrate that the proposed development will not cause an unreasonable impact on atmospheric conditions within the Pacific Place communal open space and the adjoining private balconies. It is also important to note that no wind tunnel testing was conducted by Windtech in the preparation of the current assessment. As a result, the report addresses only general wind effects and any localised impacts observable through visual inspection, and its recommendations are made on an in-principal basis only. Accordingly, we request that the Applicant undertake further wind environment analysis to assess these potential impacts and specify any mitigation measures</p>	<p>Refer to response to DPHI-8.</p> <p>Windtech has confirmed that the AEON development is unlikely to have any adverse impact on the Pacific Place communal open space, and private balconies of B2E, Epica and Cambridge buildings, assuming the existing street vegetation is retained.</p>
<b>Cumulative impacts</b>	<p>There are several other significant developments proposed or underway in the Chatswood area, including at 44–52 Anderson Street and 54–56 Anderson Street . The cumulative impact of these developments on traffic, infrastructure, and community wellbeing has not been adequately addressed. A comprehensive assessment of the combined effects of these projects is essential to ensure sustainable and balanced urban growth.</p>	<p>We acknowledge that there are several other proposals within this development's vicinity however, cumulative impacts can only be assessed on approved developments. Cumulative impacts have been considered in Section 2.3 of the EIS.</p>

# 5 Updated Project Justification

This Report has responded to each of the issues raised in the government agencies and public submissions received regarding the proposed shop-top housing development at the site.

There is no change to the evaluation of the proposal's statutory or strategic merit, as a result of the RTS.

## 5.1 Suitability of the site

The site is considered highly suitable for the proposed development and the development is suitable for the site for the following reasons outlined in the EIS:

- The proposal is consistent with the MU1 Mixed Use zone objectives, is permitted with consent and satisfactorily addresses the relevant provisions in the LEP 2012 and DCP 2025
- The proposed development will benefit from being co-located within proximity to other new mixed-use developments, supporting the economic and social growth and activity in the Chatswood CBD, aligning with the key strategic vision.
- The proposed development will optimise use of an underutilised site and align with strategic objectives to support the Willoughby LGA and NSW with a continued transition towards providing high-quality market and affordable housing, that has minimal environmental impact on the surrounding area.
- The bulk and scale of the proposed development is compatible and consistent with its existing and future context. There are no significant environmental constraints that would limit the project from being developed at the site.
- The site is accessible and serviced by transport, with connections to the Pacific Highway to the west and the M2 further south, providing wider connectivity to the LGA and regional context. The site is located approximately 330m walking distance from the Chatswood Transport Interchange, which provides rail, metro and bus connections.

## 5.2 Public interest

The proposal will deliver significant public benefits to the community. The proposal is in the public interest that it:

- is wholly consistent with relevant State and local strategic plans.
- predominantly complies with the relevant State and local planning controls including the relevant provisions in the LEP and DCP.
- delivers much needed housing supply that will contribute towards the NSW Government's housing targets under the Housing Accord and that is suited to the housing needs of in this part of Sydney.
- will deliver commercial/retail uses within the podium levels to service the community and provide new potential job opportunities for the LGA.
- has been comprehensively assessed as outlined in the EIS, which demonstrates that the development will not have any adverse environmental impacts on nearby land uses and where required, appropriate mitigation measures are proposed.
- will facilitate the orderly and economic use and development of the land.



# Appendices

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# Appendix BE – Submissions Register

**Table 7: Submissions Register**

<b>GROUP</b>	<b>NAME</b>	<b>MATTER</b>	<b>SECTION WHERE ISSUES ADDRESSED</b>
Public authorities	DPHI Willoughby City Council	Height and overshadowing	<b>Section 4 Table 3, 4, 6</b> of this RTS Report
		Non-compliances	<b>Section 4 Table 3, 4, 6</b> of this RTS Report
		Contributions	<b>Section 4 Table 4</b> of this RTS Report
		Design excellence	<b>Section 4 Table 4</b> of this RTS Report
		Landscaping and public domain	<b>Section 4 Table 4</b> of this RTS Report and <b>Appendix AY, I, L</b>
		Affordable housing	<b>Section 4 Table 4, 6</b> of this RTS Report
		Residential amenity	<b>Section 4 Table 3, 4, 6</b> of this RTS Report and <b>Appendix N</b>
		Traffic and parking	<b>Section 4 Table 3, 4, 6</b> of this RTS Report and <b>Appendix AX</b>
		Noise	<b>Section 4 Table 3, 6</b> of this RTS Report and <b>Appendix S</b>
		Waste and engineering matters	<b>Section 4 Table 4</b> of this RTS Report and <b>Appendix Y</b>
		Flooding and stormwater management	<b>Section 4 Table 4</b> of this RTS Report and <b>Appendix AS, AV</b>
		Infrastructure	<b>Section 4 Table 5, 6</b> of this RTS Report.
		Ausgrid	N/A
Sydney Trains	Deferred commencement and operational conditions	<b>Section 4.3 Table 5</b> of this RTS Report.	
TfNSW	N/A	N/A – no actions required	
Heritage NSW	Missing evidence	<b>Section 4.3 Table 5</b> of this RTS Report and <b>Appendix AA</b>	
DCCEEW	Compliance with Water Access Licence	<b>Section 4.3 Table 5</b> of this RTS Report and <b>Appendix AV</b>	
Sydney Water	N/A	N/A – no actions required	
Sydney Metro	Insufficient information	<b>Section 4.3 Table 5</b> of this RTS Report	
Air Services Australia	N/A	N/A – no actions required	
CASA	N/A	N/A – no actions required	

GROUP	NAME	MATTER	SECTION WHERE ISSUES ADDRESSED
	Fire + Resue NSW	N/A	N/A – no actions required
Public	Rex Mao	Object	<b>Section 4.4 Table 6</b> of this RTS Report
	Nayden Natchevski	Object	<b>Section 4.4 Table 6</b> of this RTS Report
	Milestone (AUST) Pty Limited	Object	<b>Section 4.4 Table 6</b> of this RTS Report
	Name Withheld	Support	NA – no actions required
	Name Withheld	Object	<b>Section 4.4 Table 6</b> of this RTS Report
	Name Withheld	Comment	<b>Section 4.4 Table 6</b> of this RTS Report

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# Appendix BF – Updated Mitigation Measures

An update to the lodged mitigation measures table at **Appendix E** has not been necessary because of the nature of the agency submissions and comments received. On this basis, the proposal continues to rely on the mitigation measures at **Appendix E**.



