



APPENDIX C – RESPONSE TO COMMUNITY SUBMISSIONS

Times raised in submissions	Key Issue	Response
31	Height (inconsistent with surrounding prevailing heights)	<p>The maximum built height of Buildings D and J have been reduced by 3 -4 storeys, with Building D being a maximum of 10 storeys above the podium (12 storeys in total) and Building J being 9 storeys above the podium (11 storeys in total).</p> <p>Building frontages to Barber and Evans Avenue have a very different role and scale compared to buildings fronting Eastlakes Reserve. For Barber and Evans Avenue it is important that new built forms maintain a scale and character relative to the immediate neighbourhood. This includes maintaining a sense of human scale and creating a balanced streetscape that is framed by comparable height on either side of the road.</p> <p>While the surrounding buildings are one consideration in determining height at the local centre, ultimately these buildings will be re-developed in the long term as flagged in Bayside Council's <i>Draft Eastlakes Local Town Centre Masterplan</i>. Therefore, building height should be informed by the scale and width of the public realm, and in particular the roads themselves or the park. As the current road width is 24m, a building height of 24m is thus an appropriate building height to consider. Taller buildings can transition around to Evans Avenue to create a framed main street environment and respond to height on the north site.</p> <p>The scale and dimensions of the public realm, such as the widths of roads and the scale of parks, play a key role in informing appropriate building heights to surrounding built form.</p> <p>At Eastlakes, built form fronting Eastlakes Reserve responds to the scale and proportions of the park. Meanwhile, built form alongside Evans Avenue and Barber Avenue, responds directly to the scale of the street and adjoining buildings. In both instances, maintaining a human scale is an important and consistent approach.</p> <p>Eastlakes Reserve is a significant size local park and creates generous amenity setting for the local centre. The existing park is irregular in shape and ranges from 40m deep in the northern end for a small portion of the site to 115m deep at the southern end. In width it ranges from 100m in length towards the west to 150m in length in the east adjacent to the centre.</p> <p>In many great cities around the world, open space provides great relief to the urban fabric, and the scale of surrounding buildings embrace this amenity, framing the space.</p>

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		<p>Eastlakes Reserve is currently framed by low rise buildings, typically four storeys with a pitched roof (or 12-15 meters). This housing does not contribute to a place specific response to the park or a positive framing of the space, allowing housing to embrace the amenity.</p> <p>The following image illustrates the outcomes proposed for the site in response to a building mass and grain analysis:</p> <p>ARTICULATE BUILDING SCALE AND MASSING IN RESPONSE TO CONTEXT</p> <p>Building mass responds to scale and proportions of surrounding residential blocks</p> <p>Building mass steps to the south responding to adjacent residential blocks.</p> <p>Long building form halved into two buildings to reduce bulk and scale</p> <p>Tower forms aligns with podium extent to create a defined and urban street edge</p> <p>Street setback in response to immediately surrounding urban context and character</p> <p>Upper podium level</p> <p>Lower podium level</p> <p>BARBER AVE</p> <p>EASTLAKES RESERVE</p> <p>EVANS AVE</p>



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33	Bulk and scale (overbearing on neighbouring properties)	<p>The built form massing of Buildings D and J have been significantly reduced to a maximum of 10 storeys above the podium for Building D and 9 storeys above the podium for Building J, and divided into two separate building forms along the park edge.</p> <p>Building D has a length of approx. 40m; Building J has a length of 70m. The three lower scale towers (Building E, F & G) between four and six storeys to the rear remain generally as exhibited with minor internal planning changes and addition of roof top plant.</p> <p>The massing of the amended proposal is consistent with existing and proposed buildings in the vicinity of the site as documented in the MR and the amended Urban Context Report (refer Appendix H).</p> <p>A series of design measures have been proposed to articulate the building façade and mitigate the scale and mass in response to the sites context and matters raised during exhibition, including:</p> <ul style="list-style-type: none"> • The separation of Building D-J into two slimmer discrete building forms minimises the dominance of the building on the public domain while maintaining a strong frame and edge to Eastlake Reserve. • The reduction in height of Building D to 10 storeys above podium (12 storeys total) and the curved corners is more consistent with the approved Gateway Building 1B (seven storeys above podium) on the opposite side of Evans Avenue. The consistency between Building D and Building 1B is accentuated by the consistent datum line created by the façade material change on the eighth storey of Building D. This creates a common architectural language in the precinct and provides an appropriate height transition from Building 1B (on the North Site) to Building D and Building J. • Building J has been amended to step down in height at the southern boundary to minimise the built form impact on the Barber Avenue streetscape, resulting in an appropriate interface with the streetscape. • Building D has been setback further from Eastlakes Reserve which opens sight lines down Racecourse Place looking south. The 12-storey form of Building D is appropriate for its corner gateway position for the site and more broadly local centre and compliments the approved (as proposed to be amended) design of the ‘north site’ buildings. • The facades of Building D and Building J have been treated with different materials to mitigate the visual impact of the mass on the upper levels when viewed from key public places. Stronger colours are used on the lower



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		<p>elements of the façade, while a lighter diaphanous palate is used on the upper façade. This reduces the built form impacts on the park interface and provides a visually appealing façade.</p> <p>Overall, the scale of the development is considered appropriate given the shopping centre is the ‘central or focal point’ of the locality, and the massing will positively mark the location of the centre. Whilst this will become the tallest development in the centre, the locality is characterised by a mix of building forms that include residential flat buildings and larger towers and thus the proposal in our assessment does not create a discordant relationship to the existing surrounding context.</p> <p>The proposed density and height is also consistent with Bayside Council’s recently exhibited draft <i>Eastlakes Master Plan</i> which identifies potential for building heights of up to 9 storeys for sites immediately surrounding the subject site, with heights gradually stepping down as they move away from the site and ‘town centre heart’. Given the site is at the centre of the Eastlakes Local Centre in accordance with urban design best practice it is generally expected that building heights in this location are greater in height than the surrounding area. The proposal strategically locates the taller buildings to the west to define and frame the park edge and maximise views out towards the open space, away from any residential interface. To the east and south, building heights gradually step down in recognition of the existing residential context to provide a suitable transition and acceptable level of impact to the surrounding dwellings.</p>
36	Out of character	As above.
62	Traffic (local roads are unable to support an increase in vehicles)	<p>CBRK have amended the Traffic Report and updated the SIDRA modelling (refer Appendix K). In terms of traffic impacts the amended Traffic Report states:</p> <p><i>The proposed modifications to the southern site will generate a modest increase in traffic generation of some 60 additional vehicles per hour (two-way) during the Thursday morning and afternoon peak periods, compared to the approved development. During the Saturday midday peak period there would be a smaller increase of some 20 vehicles per hour (two-way).</i></p>



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		<p><i>When distributed to the surrounding road network the greatest increase in traffic would occur on Racecourse Place with increases of some 30 vehicles per hour, two-way in the morning and afternoon peak hours. On other roads the increases would be less at up to 15 vehicles per hour, two-way. These are low increases in traffic, equivalent to an average of less than one additional vehicle every 2 to 4 minutes. Such minor increases during peak periods would not affect the operation of the surrounding road network.</i></p>
26	Public transport (at capacity / lack of options)	<p>CBRK have amended the Traffic Report to include a detailed assessment of the existing public transport services and the expected demand of the proposed modification. The report finds the following:</p> <p><i>This MOD 4 would result in an increase of some 24 trips by bus in the AM peak hour and some 30 trips by bus in the PM peak hour. These trips would be spread over the four bus routes that service the area which provide an average 16 buses per hour in the peak periods. When these additional trips are spread across these services, it would result in increases of 1 or 2 passengers per bus. Such an increase would not be noticeable in the daily variation of demand for bus services in the area.</i></p> <p><i>Sydney Buses has advised that bus routes in the area will be reviewed following the completion of the light rail. It is anticipated that the completion of the light rail will result in a change in travel patterns to the CBD with passengers having a choice between a trip by bus or by bus/light rail. Sydney Buses advised that this will result in a more trips being each direction along Gardeners Road rather than in the current peak direction, thus increasing capacity.</i></p>
11	Architectural design (unsupportive of design)	<p>The modified proposal represents a superior architectural response to the site and context when compared to the approved and exhibited schemes.</p> <p>Built form fronting Eastlakes Reserve responds to the scale and proportions of the park. Meanwhile, built form alongside Evans and Barber Avenue, responds directly to the scale of the street and adjoining buildings. In both instances, maintaining a human scale is an important and consistent approach.</p> <p>The curved corners are consistent with the approved Gateway Building 1B on the opposite side of Evans Avenue. The consistency between Building D and Building 1B is accentuated by the consistent datum line created by the façade material change on the eighth storey of Building D. This creates a common architectural language in the</p>



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		<p>precinct and provides an appropriate height transition from Building 1B (on the North Site) to Building D and Building J.</p> <p>The facades of Building D and Building J have been treated with different materials on the upper levels. Stronger colours are used on the lower elements of the façade, while a lighter diaphanous palate is used on the upper façade.</p>
4	Land use (residential not supported)	<p>The site is zoned to permit residential.</p> <p>The proposal is in response to revised strategic directions for Greater Sydney and the Eastern District in relation to population projections, housing and job targets compared to what was anticipated when project approval was granted in 2013.</p> <p>The south site is approved for 292 residential apartments. The modification seeks to increase the dwelling total to 361 (an increase of 69 dwellings), which represents a substantial reduction of some 107 apartments compared to the exhibited 2018 scheme.</p>
6	Obstruct views	<p>An updated View Impact Assessment has been undertaken. 10 key viewpoints were identified and a comparison analysis between the existing centre, the approved development, the exhibited development, and the Preferred Project was undertaken.</p> <p>The analysis demonstrates that although the Preferred Project scheme increases visibility of the centre, this heightened visibility provides a key wayfinding and legibility marker to both pedestrians and motorists in the 800m catchment of the site. The analysis demonstrates when viewed from 800m, the proposed built form, although visible, sits within the overall composition of other elements in the skyline, both built and natural.</p> <p>The analysis also demonstrates that the reduction of three to four storeys in the Preferred Project provides a development more in keeping with the local context. In relation to View 8 from St Helena Parade, the developments building envelope maintains a particularly prominent presence in this view. However, the building quickly recedes beyond it and cumulatively there is a substantial reduction in visible building form compared to the 2018 scheme.</p>



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27	Overshadowing (impacts to Eastlakes Reserve and neighbouring dwellings)	<p>Overall, the proposal provides significantly greater solar access to Eastlakes Reserve during mid-winter compared to the approved development by approximately 50%. Between 11am and 3pm at mid-winter the proposal provides unimpeded solar access to Eastlakes Reserve.</p> <p>In terms of the surrounding residential properties, FJMT have prepared a solar heat analysis of the amount of direct sunlight received by surrounding properties. The analysis demonstrates that all the buildings in the immediate context of the proposed development will receive in excess of two hours of solar access on 21 June.</p>
27	Noise (from 24/7 loading dock, general operating noise)	<p>Approval is no longer sought for the 24-hour use of the loading dock.</p> <p>The proposed hours of operation of the loading dock and waste removal / collection is to be between 5am and 10pm daily.</p> <p>Pulse Acoustic Consultants have assessed the loading dock operation. Four worst case scenarios of loading dock activities have been assessed:</p> <ul style="list-style-type: none"> • Scenario 1: Heavy vehicle braking inside the loading dock with the shutter doors open. • Scenario 2: Heavy vehicle idling inside the loading dock with the shutter doors open • Scenario 3: Heavy vehicle reversing inside the loading dock with the shutter doors open • Scenario 4: Heavy vehicle movement inside the loading dock with the shutter doors open <p>Pulse Acoustic Consultancy predict the noise emissions from the loading dock will exceed the sleep arousal criterion. The following acoustic mitigation measures are recommended in order to achieve compliance with the relevant criterion:</p> <ul style="list-style-type: none"> • Roller shutter door should be closed during the shoulder period (5am and 7am). • The roller shutter door must be constructed from an imperforate material. <p>The loading dock will not operate 24-hours a day, and during operating hours noise will be adequately mitigated.</p>




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17	Car parking (insufficient / cause issues with on street parking)	<p>A total of 916 spaces are proposed to be provided on the South Site, and 286 spaces on the North Site (1,202 total). Colston Budd Rogers & Kafes have assessed the revised car parking arrangements for the North Site and the South Site. The proposed number of car spaces for the residential and retail uses have been determined based on the site-specific parking rates developed under the Part 3A approval and the commercial uses in accordance with the Botany Bay DCP and Roads and Maritime Services guidelines. In summary, the proposed basements can accommodate the required number of spaces as specified by the relevant guideline or policy.</p>
16	Infrastructure including schools, hospitals and open space at capacity	<p>The proposal includes the provision of a community centre and childcare centre to cater for existing and future residents.</p> <p>A revised Public Benefit Offer (PBO) has been drafted and was issued to Bayside Council for consideration on the 7 May 2019. The revised PBO has been simplified and takes into consideration the comments received by Bayside Council in their submission. The revised PBO proposes a total contribution of benefits equal to \$4,650,000 comprising:</p> <ul style="list-style-type: none"> • Public domain upgrades surrounding the site (with the extent to be agreed with Council); • Monetary contribution to be used for upgrades to established or new community facilities and public spaces within Eastlakes; • Affordable housing contribution equivalent to 10% of the total number of additional apartments proposed in this Modification Application. <p>The quantum of the contribution is considered commensurate to the density uplift and will enable Council to utilise the monetary contribution toward centre wide initiatives it identifies as part of their own strategic studies.</p> <p>Reference should be made to the PBO submitted at Appendix W.</p>
7	No community / public benefit	As above.



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6	Demographics (fails to cater for current community)	<p>The proposal will facilitate change in the area which is consistent with the planning of the local centre. The Botany Bay Planning Strategy 2031 was released by Botany Bay Council to provide insight into the economic and residential growth of the LGA. The Strategy identifies the strengths, challenges and strategy principles for the area, and the strategy directions to be followed and considered when preparing Development Applications.</p> <p>The Strategy identifies Eastlakes as an appropriate place for renewal and intensification of residential uses and identifies potential for increased density at Eastlakes between Universal and Garden Streets and around the Eastlakes centre, integrated with a redevelopment and expansion of the shopping centre.</p> <p>The Strategy identifies the capacity of the Eastlakes centre to provide 2,060 dwellings and 150 additional jobs by 2031 representing the highest concentration of dwelling growth across the LGA. These dwelling and job projections are out of date and need to be updated to reflect recent population projections to accommodate an additional 325,000 people in the Eastern City District by 2036.</p> <p>The capacity for Eastlakes to accommodate greater density has been carried through to Bayside Council's <i>Draft Eastlakes Local Town Centre Masterplan</i>, released for public exhibition in July 2019. While the masterplan concludes that the sites surrounding the site are not feasible for redevelopment in the short to medium term, this positions the subject site in a good position to realise some of the objectives of the masterplan in terms of urban renewal, and can be a catalyst for change within the wider area.</p> <p>The proposal includes the provision of a community centre, childcare centre, public domain upgrades, retail and everyday services, a monetary contribution to be used for upgrades to established or new community facilities and public spaces, and an affordable housing contribution equivalent to 10% of the total number of additional apartments proposed in this Modification Application.</p> <p>The proposal provides significant benefits for existing and future residents.</p>
3	Pedestrian safety	<p>The location of the carpark driveway is consistent with the Project Approval. A series of other access options were investigated as part of the Project Approval but were not considered feasible.</p> <p>As discussed in the Traffic and Parking Report (refer Appendix K), the preferred access arrangements were selected based on the following:</p>

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		<ul style="list-style-type: none"> the access points to the southern site are located to easily and quickly capture traffic accessing the centre without using local streets; the size of the southern car park requires two access points. They have been located at the western end of the site to minimise traffic effects on Evans Avenue (east) and Barber Avenue (east); if not located at the western end of the site, the access points would have to be located on Evans Avenue (east) and Barber Avenue (east). Access from either of these locations would increase traffic on these streets compared to the project approval access arrangements and would impact on pedestrian linkage between the northern and southern sites. <p>Furthermore, an analysis of pedestrian walking routes from the various directions surrounding the centre indicate that a pedestrian visiting the centre will approach the site generally as per the image below, avoiding the location of the Evans Avenue vehicular driveway.</p>

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		<p>Notwithstanding, a further review of the Evans Avenue driveway has been undertaken. As a result, the driveway ramp has been moved 3m south relative to the exhibited scheme to allow for improved pedestrian amenity, ie: cars will not be approaching the cross over immediately after ramping.</p> <p>As illustrated in the below perspective view looking south toward the Evans Avenue driveway, FJMT have designed the area around the driveway to direct pedestrian travel up and over the driveway to Racecourse Plaza and the Eastlakes Reserve. Appropriate signage and footpath treatments will be installed, as well as the walls around the driveway to deter people from using this as a pedestrian crossing.</p> 



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5	Significant change from original approval and incremental modifications	<p>The proposed increase in gross yield has been further decreased by this Preferred Project submission and represents a 19% increase compared to the Project Approval.</p> <p>The increased density responds to the strategic importance of the site to realise the state mandate to increase the supply of housing to accommodate for population projections. The proposal also improves supply of commercial and community land uses within an accessible and walkable catchment.</p> <p>The increase the dwellings and provision of various uses across the site seeks to address a change in Sydney demographics and strategic planning policies since the 2013 project approval including increased population projection forecasts, and associated dwelling and job projections.</p> <p>Since project approval was granted in 2013, the <i>Greater Sydney Region Plan</i> and <i>Eastern City District Plan</i> have been released and adopted. These plans are supported by revised population, dwelling and job projection forecasts over next 20 years until 2036. Specifically, the plans identify that significant growth is anticipated than what was forecasted by the <i>Draft Metropolitan Strategy for Sydney 2011-2031</i> (the plan that applied at the time of the 2013 project approval) comprising an increase of 400,000 people, 180,000 dwellings and 192,000 jobs.</p> <p>Within the Eastern City, the Plan identifies that an additional 157,500 dwellings are required by 2036. While, it is understood that Bayside Council are currently in the process of preparing a housing strategy to determine the 6-10-year targets for the LGA, extrapolating the methodology used to calculate the 0-5-year targets, 22% of the housing in the eastern city is to be concentrated in Bayside Council representing an additional 34,650 dwellings (1,733 per annum) are required in the Bayside LGA by 2036.</p> <p>In the context of the scale of housing growth Bayside Council is to support in future, the additional housing sought on the site is considered relatively minor. Furthermore, it represents a logical location to share in supporting a small proportion of the required housing growth given it is an established local centre and thus benefits from good transport and service offering.</p> <p>The District Plan identifies that an additional 190,900 jobs are required in the Eastern City by 2036 which will further improve the proximity of the centre to jobs. In addition, transport accessibility to these centres will also be improved as a result of the transport improvement initiatives identified in the Plan including the City serving Transport Corridor which will run along Gardeners Road, north of the site, between Kingsford and Mascot / Green Square.</p>



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		<p>Due to the integration of the proposal with the shopping centre, the proposal is well suited to support increased density given its convenient location and the convenience of having local services within the centre. The proposal includes the provision of an entire ground floor level of retail floor space including one supermarket and several tenancies to service the anticipated resident population which is proposed to be further increased as part of this modification to provide greater diversity of retail and community services for the public.</p> <p>The proposed modification from a density perspective, results in a relatively minor intensification from that approved. The proposed additional apartments and non-residential floor space is considered to be appropriate for the site in the context of scale of comparable local centres in the District. The increased density aligns with the latest regional and district planning policy in terms of locating residential density.</p> <p>Although the proposal represents a change from the approved scheme, it seeks to realise the objectives of key strategic planning policy and respond to demographic changes and populations projections.</p> <p>The proposal is also highly consistent with the desired future character of the area as identified in Bayside Council's <i>Draft Eastlakes Local Centre Masterplan</i>.</p>