22 January 2026

NSW Department of Planning, Housing & Infrastructure
12 Darcy Street
PARRAMATTA NSW 2150

Dear Lucinda,

Application No: SSD-83258708
Property: 29 Florida Street, Sylvania
Proposal: Construction of 8 residential flat buildings containing a total of 484 dwellings across two stages (including 159 residential apartments for the purpose of affordable housing)

Thank you for the opportunity to comment on the State Significant Development (SSD) application (SSD-83258708) for the above residential development inclduing affordable housing at 29 Florida Street, Sylvania.

Given time constraints this submission is prepared by Council officers and will be shared with council's elected members upon submission to the Department. We are supportive of providing for increased housing densities, and particularly the delivery of affordable housing. It is recommended that the proponent discuss issues raised in this submission with Council to work through infrastructure needs and design that will allow for a development that rewards all stakeholders.

The most significant issue raised is the need for infrastructure upgrades around the site to allow for safe vehicle and pedestrian connectivity. The site operates akin to an island that is bordered by classified roads with heavy traffic movements namely the Princes Highway and Port hacking Road. The proposal provides for an additional 401 residential units with no improvements to pedestrian infrastructure/connectivity to and from public transport and the Southgate Shopping Centre. The increased densities afforded to the site are considered incompatible with the current infrastructure realities and will impose unsustainable pressure on the surrounding road network. Port Hacking Road is already highly congested during peak periods, particularly where vehicles turn right onto the Princess Highway. Existing pedestrian crossing arrangements are inadequate to accommodate the proposed increase in density and associated pedestrian movements. This is a first order issue that must be resolved prior to considering any form of residential uplift on the site.

In regard to design we recommend that a contextual study be completed to establish how the additional building mass will be appropriately accommodated without adversely impacting the amenity of adjoining low-density development. There would be a benefit from re-massing the proposal to reduce reduce overshadowing impacts and allow for an improved contextual response to adjoining lower densities.

Further analysis is required regarding flood impacts and the potential increase in flood hazard at the intersection of Pembroke Street. Flood mitigation works are required to ensure that the existing rating is not increased and internal road design needs reviewed to ensure conflicts with pedestrians and vehicles are addressed.

Given the significant infrastructure and design issues raised we submit this correspondence as an objection to the current proposal.

1. Strategic Context

It is acknowledged that the site is located within the 'inner area' of an identified Town Centre being within 400m of the Southgate Shopping Centre immediately west of the site. Accordingly, the low and mid-rise housing provisions under Chapter 6 of the State Environmental Planning Policy (Housing) 2021 apply to the site, providing an uplift lift in density beyond the development standards prescribed under the Sutherland Shite Local Environmental Plan 2015 (SSLEP 2015). In addition to this, the Housing SEPP sets out bonus provisions for affordable housing under Chapter 2, which also apply to the proposal and enable further uplift.

The site is currently occupied by social housing, including 83 dwellings in a mixed flats/townhouse configuration. The proposal is to construct 484 dwellings, including 159 social housing dwellings to replace the existing housing which was developed in the late 1980's. There is unmet demand for social and affordable housing in the area. In 2016 only 2.3% of households were in social housing in 2021, compared to 4.1% in Greater Sydney. According to the 2021 Census, 16.7% of households in the Sutherland Shire were experiencing mortgage stress, and 34.5% were facing rental stress.

More than 60% of employed residents commute outside Sutherland Shire, yet the surrounding road infrastructure is already operating beyond capacity. Progress on the M6 Stage 1 project has stalled, and there is no committed State funding for further stages. Promises of future rail enhancements to alleviate road network pressures have been vague and speculative. Reliance on a bus service that is not prioritised along the Princes Highway and is caught in commuter congestion is unreliable and unsustainable.

The proposal is not definitive whether there will be affordable housing or social housing. The proposal vaguely indicates that there will be 159 apartments for the purpose of 'social housing' - which does fall within the definition of affordable housing. However, the proposal also indicates that "Homes NSW will be partnering with a registered CHP who will develop and manage the affordable housing component for at least 25 years" (EIS, pg 42). An increased and stable supply of affordable housing can reduce the need for social housing. However, in 25 years there will be **no** social and/or affordable housing on this site.

The ultimate loss of 83 social housing dwellings is opposed as this will be a significant loss of much needed social housing in the Sutherland Shire.

2. Pedestrian Infrastructure

The Southgate Shopping Centre is located immediately west of the site, opposite Port Hacking Road, and contains a variety of retail and other commercial premises. Bus services 971 and 972 (Miranda to Hurstville) are also located along Port Hacking Road in front of the Southgate Shopping Centre.

The proposal seeks to provide an additional 401 dwellings on the site. However, current conditions demonstrate a lack of safe, direct and convenient pedestrian connectivity between the site and Southgate Shopping Centre, including access to public transport services. Currently, the only safe pedestrian connection to the Southgate Shopping Centre and public transport is via the signalised pedestrian crossing at the intersection of Melrose Avenue and Port Hacking Road. This requires an average detour of approximately 400m from the centre of the site to safely access the majority of services.

Site observations indicate that pedestrians prefer to take the most direct route and risk crossing six lanes of traffic across Port Hacking Road rather than taking a long detour. This behaviour highlights a significant pedestrian safety concern and highlights the inadequacy of the existing pedestrian network to support the scale the proposal.

There are options available to improve pedestrian safety and connectivity including the provision of either a grade separated pedestrian facility (bridge), mid-block pedestrian signals, pedestrian fencing and/or upgrading of existing pedestrian signals. As both Princes Highway and Port Hacking Road are state roads, this will fall under the responsibility and determination of Transport for NSW.

Notwithstanding the above, Council strongly objects to the proposed uplift in development at the subject site in the absence of appropriate pedestrian infrastructure capable of supporting the scale of the proposal.

3. Built Form and Scale

The proposal comprises 8 residential flat buildings ranging between 7-9 storeys in height across the site. Further investigation into the distribution of building mass across the site is required to ensure a contextually responsive design that maximises residential amenity and is sensitive to surrounding development.

The current proposal burdens Florida Street and Pembroke Street with excessive building mass which does not respond to the character of the street and overshadows adjoining residential development. A more contextually responsive design would increase building height fronting Princes Highway and Port Hacking Road, allowing the scale of buildings fronting Florida Street and Pembroke Street to be reduced. To achieve this outcome, height controls in the northern and western portions of the site would need to be relaxed.

The below figure (Figure 2) outlines a strategy for the redistribution of building mass, by lowering building heights in the southern portion of the site (highlighted in purple) and increasing building height in the northern portion of the site (highlighted in red). A portion of the western wing within the social building is recommended to be removed to allow a more open area of communal / public open space to be established. This strategy would need to be modelled and analysed in detail to establish appropriate heights for all street frontages. It is anticipated that the current yield of the site would not need to be reduced to achieve a more contextually responsive outcome.

Figure 1 *– Recommended redistribution of mass.*

The proposed development will be significantly denser than existing buildings within the surrounding neighbourhood. The increased building mass will be most imposing at the interface with the low-density residential environments of Florida Street and Pembroke Street. Further refinement of the proposal is required to reduce the perceived bulk and scale of development along these sensitive

interfaces and to achieve a more appropriate transition to the adjoining low and medium density residential zones.

4. Amalgamation of adjoining properties

The development excludes the Telstra site at 94 Princes Highway and the remaining residential properties at 92 Princes Highway and 27 Florida Street. The proposal should demonstrate how these residual sites could be integrated into the overall development to achieve the densities envisaged under the Housing SEPP reforms. Leaving these sites isolated may result in a fragmented and poor planning outcome.

5. Solar Access

A 'Sun-eye Views' plan accompanies the application which demonstrates the southern edge of the social housing building (that does not comply with the maximum height control) will dictate the extent of shadow cast by the proposal. Figure 2 below is an extract from the architectural plans which demonstrates that at 12pm, 21st of June, the non-compliant upper-level is the primary contributor to overshadowing of the southern adjoining properties.

***Figure 2** – Extract of sun eye view at 12:00pm on 21 June.*

The solar access diagram provided in the Design Report by BVN (pages 69 and 70), indicates that the height contravention will not impact solar access to the residential properties on the southern side of Pembroke Street. This contradicts the sun eye view diagrams provided in the architectural drawing package and as such, the extent of overshadowing to properties south of the site has not been accurately or consistently documented. Given the significant increase in height provided by height bonuses, the transition to a lower scale residential zone and the proposed height non-compliance, it is essential that the proposal is informed by an accurate and comprehensive solar access study.

The extent of overshadowing affecting the southern adjoining properties must be clearly and accurately demonstrated. This includes modelling existing buildings, identifying areas of private open space and windows to habitable rooms, and updating sun's eye view diagrams to quantify the duration and extent of overshadowing. The outcomes of this study should be used to further refine the built form of buildings fronting Pembroke Street to ensure an appropriate transition to the adjoining low-density residential context is achieved.

6. Communal Open Space

The proposal has been designed to accommodate a series of cross site links, providing a permeable development that connects with the surrounding street network. This is acknowledged as a positive urban design outcome. However, this design approach has resulted in the entirety of the ground plane effectively becoming public domain, which fundamentally changes the character of the external spaces and limits their ability to support a diverse range of activities. In addition, these ground-level spaces will be significantly overshadowed due to the height, massing, and proximity of the surrounding buildings.

To complement the ground floor public open space, it is suggested that consideration be given to incorporating a wider variety of communal spaces, including roof top terraces and communal rooms which are more likely to achieve improved solar access, amenity and functionality for residents.

Insufficient information has been submitted to clearly understand the quality of external spaces. This raises concern that some areas of the ground floor open space and building interfaces are not currently resolved. Notwithstanding, the following issues can be identified based on the information currently available:

- The western lobby of the Social housing building appears to lack an accessible entry - only steps are provided.

Figure 3 *– Extract of Level 04 illustrating location of stairs (highlighted in yellow) into the lobby of the Social housing building.*

- The elevated ramp adjacent to building 1A results in direct overlooking into the private open space and habitable rooms of the adjoining units, compromising residential privacy and amenity.

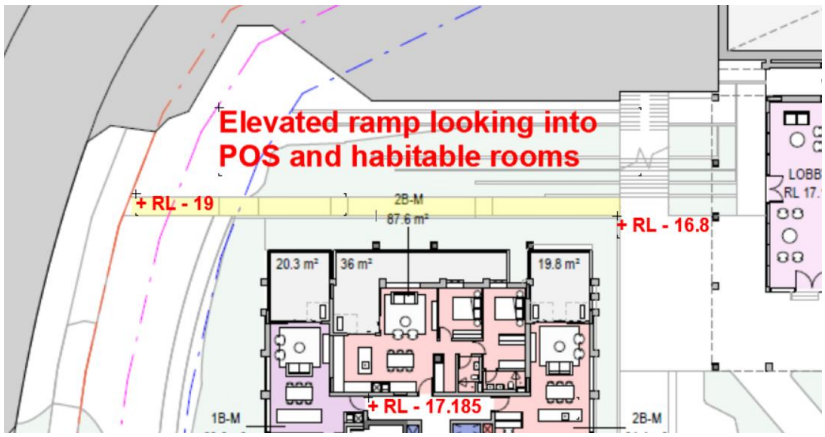

Figure 4 *– Extract of Level 04 illustrating location of pedestrian ramp (highlighted in yellow) in comparison to balconies.*

- A foot path elevated above the ground floor level of building 3B is positioned hard up against residential units, compromising the privacy of bedrooms and living areas.

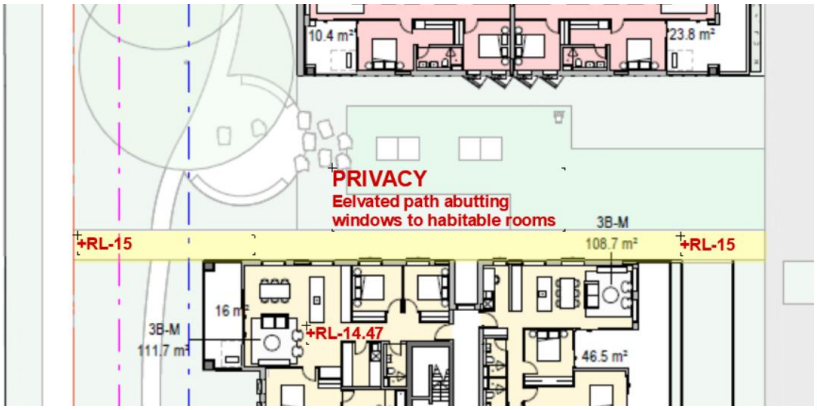

Figure 5 *– Extract of Level 04 illustrating location of elevated path (highlighted in yellow) in comparison to building 3A.*

- To realise the design intent outlined on page 30 of the Design Report (Porous and Permeable), the east-west oriented pedestrian path between building 1A and 3A should be extended to provide a direct connection to Port Hacking Road.

Figure 6 *– Extract of Level 04 illustrating potential pedestrian connection to Port Hacking Road.*

- The outdoor gym equipment is proposed to be accessible to the public 24 hours a day and would therefore be difficult to manage. Its location within a narrow space between buildings 3A and 3B, and in close proximity to windows of habitable rooms, is likely to result in adverse privacy and amenity impacts for residents. Consideration should be given to relocating the gym to a more appropriate location, such as within the ground floor of a residential building, where access can be controlled and the facility effectively managed. The western edge of building 3 may provide a suitable alternative location.
- The pedestrian path located within the landscape setback to Port Hacking Road provides limited amenity value and has the potential to compromise the privacy of adjoining residential units. There is an opportunity to utilise this setback as a landscaped buffer rather than a pedestrian thoroughfare, which would improve residential amenity, enhance visual screening, and better respond to the interface with Port Hacking Road.
- The BBQ areas within the communal open space of the social housing building are located in close proximity to ground floor dwellings. This arrangement is likely to adversely impact the amenity of future occupants through noise and smoke associated with the use of these facilities.
- Consideration should be given to connecting the basements of the social building and building 3, to reduce the number of driveways and allow the western edge of building 3 to provide a more positive contribution to an active ground plain. Other connections across the basement levels should be explored to further reduce the number of driveways accessed across the site.

7. Acoustic Privacy

The site is bound by the Princes Highway and Port Hacking Road, and residential dwellings fronting these roads will be exposed high noise levels. The Noise Impact Assessment prepared by E-Lab Consulting states that noise levels will exceed 70dbl to dwellings fronting these busy roads and building facades must respond to this environment to minimise the impact upon residents. Initiatives to be considered should include the potential to enclose balconies to provide winter gardens, the inclusion of acoustic glazing and the incorporation of vertical acoustic plenums to allow units to be ventilated without compromising acoustic privacy.

8. Internal Amenity

Unit layouts are generally functional and appear to meet ADG design objectives. However, further information is required to confirm compliance with ADG dimensional design criteria for habitable rooms and POS. The following key issues are identified:

- Several units contain poorly proportioned balconies with narrow frontages, deeply recessed within the building footprint as shown in Figure 7 below. Further refinement of unit layouts is required to address this issue.

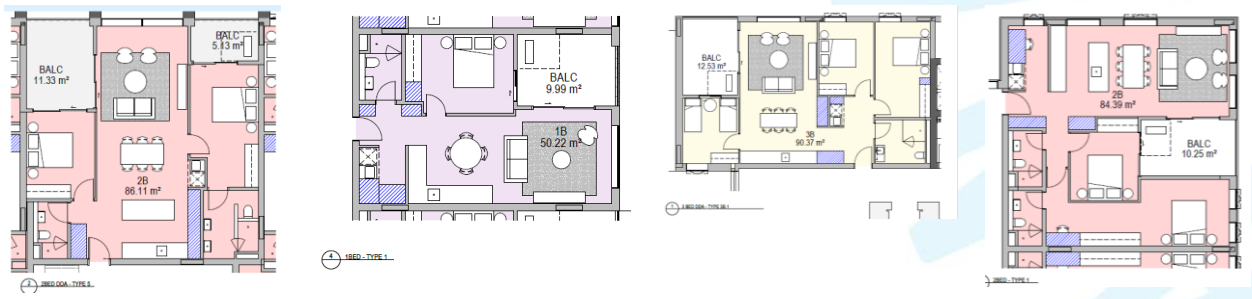

Figure 7 *– Extract of internal floor plans*.

- Several buildings contain awkward, narrow dead-end spaces adjacent to ground floor lobbies which raises safety concerns. The recess provided in the façades contribute to articulation at upper levels, but are poorly resolved at ground floor level, further development is required. Potential for antisocial behaviour should be minimized by increasing the extent of passive surveillance, eliminating narrow dead-end spaces accessible at ground floor level and appropriately locating amenities with the development.

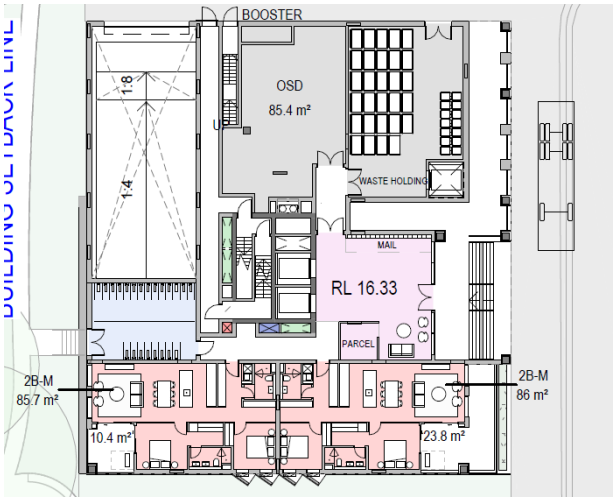

Figure 8 *– Extract of Building 3A ground floor plan.*

- Several lobbies (Buildings 1A, 1B, 1C and 3A) contain only a single window located within a deeply recessed slot in the façade. This will result in lobbies being dependent upon artificial lighting 24 hours a day. The south facing lobby of the Social Building (levels 11 and 12) has

excellent opportunity for natural light and outlook. However, the spaces currently provided appear to be largely internalised. Further refinement of residential lobbies to increase natural lighting and improved outlook is recommended.

- No information has been provided to document adaptable or accessible units. This is an essential design component that is likely to impact on the spatial requirements of all buildings. Further detail information is required.

9. Urban Design

The following key issues are raised in regard to the architectural design of the proposal:

- The proposal addresses two starkly contrasting environments, including the high traffic along Princes Highway and Port Hacking Road and the quieter, low scale residential environment of Florida Street and Pembroke Street. The current proposal currently addresses both these environments with no contextual responsive differences to either façade expression or street level interfaces. Further development should seek to respond to the specific character / environmental constraints of each street.

- The material palette is generally appropriate. However, elevational drawings lack sufficient detail to fully document the proposal and ensure the architects design intent is realised. It is suggested that more detailed elevations are provided that clearly show all material finishes. Larger scale (1:20 suggested) detail sections through building facades should also be provided. Sections should document balustrade details (dimensions of metal balustrades and handrails / type of glazed balustrade semi frameless / frameless?) sofit finishes and screen details.

- Servicing of the building must be considered at this stage of the design process. The location of service risers, car park exhausts, down pipes, balcony overflows and fire hydrant enclosure should be documented.

- The incorporation of pleated metal cladding to the façade is considered a reasonable proposition. However, the extent to which this cladding is used and the detail resolution between horizontal banding and infill panels is questionable. When capping / flashings are applied to the horizontal banding the crisp junction between materials shown in architectural perspectives may not be realised. The detail sections outlined above are necessary to show if / how the design intent shown in the perspectives is realised. Alternatively, the pleated cladding could be used as infill panels located within a solid frame (perhaps concrete or face brick, as shown in the image below).

***Figure 9** – Example of pleated metal cladding contained within a solid frame*

10. Staging of Development

The submitted EIS outlines the proposed staging of the development. To ensure the orderly development of land, the following staging is recommended:

1. Consolidation of lots
2. Stormwater drainage and associated legal requirements for properties 94 and 92 Princess highway, and 27 Florida Street (3 lots)
3. Subdivision works certificate covering the realignment of Council drainage infrastructure and associated deed of agreement and creation expungement of easements
4. Subdivision works certificate covering construction of internal roads and installation of required services for all buildings
5. Subdivision Certificate
6. Construction of social housing building
7. Construction of remaining market buildings

11. Engineering Requirements

Vehicular Access & Parking

The following matters are required to be addressed regarding vehicle access and parking:

- The number of parking spaces allocated to the market dwellings exceeds the minimum requirement by 204 spaces. However, the parking spaces allocated to the Social housing building is deficient by 7 parking spaces. The allocation of parking between the market and social housing dwellings is not considered equitable to future occupants and compliance is required.
- Parking bays associated with liveable and adaptable dwellings should conform with the silver standard and Adaptable Housing AS4299-1995. An alternative arrangement to the before mentioned standards can be considered by providing the required parking in accordance with AS2890.6.
- The proposed internal shared road is not supported as it creates conflicts and safety concerns for heavy vehicles. A traditional roadway pavement and separate foot path pavement should be provided. The road pavement width must comply with SSDCP2015 Chapter 36 for the size and scale of the development.
- The kerb and gutter within the internal private road must be designed as integral kerb 150mm high with traditional kerb inlet pits with minimum lintel opening of 1.8m.

Stormwater Management

- The proposed connection from the private drainage system into Councils Drainage network at the intersection of Pembroke Street and Florida Street is not supported. OSD 3 & 4 must connect into Council drainage network within the subject property.
- The stormwater run-off from No. 92 & 94 Princes Highway & No.27 Florida Street must be addressed at Stage 1 of the proposal.
- The proposed reconstruction of Councils Trunk drainage system must be approved by Councils Stormwater & Waterways team.
- The required reconstructed sections of Council's Trunk drainage system must be designed/consent by Council.
- Required changes to the associated easement must be undertaken in accordance with Councils Drainage Easement Policy - Drainage-Easements-Policy-ADOPTED-JUNE-2025.pdf.
- Basement levels will need to consider ground water. A referral will need to be sent to WaterNSW to consider ground water.

Flooding

The following matters are required to be addressed:

- Basement crests are to be individually assessed and provided where required. The crest must achieve the minimum 500mm freeboard.
- The increase in flood hazard at the intersection of Pembroke Street and the Private Road rating to H5 hazard is not acceptable. Flood mitigation works is required to ensure that the existing rating is not increased.

Road Reserve

The following matters are required to be addressed regarding works within the road reserve:

- Suitable sized driveway laybacks into the private road from Pembroke Street and Florida Street must be provided. The use of traditional kerb returns that resembles a public road is not supported.
- The subject frontage of Pembroke Street and Florida Street are to be provided with shared footpath/bicycle pavement.
- Where the private road joins with Pembroke Street, this conflicts with Councils existing Stormwater Infrastructure. This will require a detailed design due to it being a low/sage point within the road way. This is to be completed prior to completion of the Social housing building.
- A bus stop within the subject frontage of Port Hacking Road should be provided/indented into the subject. The bus hardstand area will be in addition to the Port hacking Road existing carriageway..

12. Landscaping

An Arboricultural Impact Assessment prepared by Birds Tree Consultancy accompanies the application which seeks to retain a significant number of existing trees, specifically around the perimeter of the site in Zone 1 – Native Forest. The proposed tree removal is considered acceptable subject to conditions of consent, including a replacement tree planting ratio of 8:1 as per Council's DCP (excluding dead or exempt trees). The total number of replacement trees have been deducted due to the nature and condition of species removed and as such, a condition of consent has been recommended before the issue of a construction certificate under **Attachment A** addressing this matter.

A Landscape Report prepared by Turf Design Studio accompanies the application which provides a planting strategy for the site and is broken up into four zones (refer to Figure 10). In principle, the planting schedule outlined in the Design Report is considered appropriate, except for the following:

- Zone 1 – Native Forest aims to restore Sydney Turpentine Ironbark Forest vegetation community. Most species are appropriate, however the Tristaniopsis laurina (Water Gum) and Cupaniopsis anacardioides (Tuckeroo) are not species of this community. Instead, Our preference is to include species such as Acacia implexa (Hickory) and Allocasuarina torulosa (Forest Oak).
- Zone 2 – Rain Garden aims to provide species that have a high water intake. The species recommended in the report are suitable native species for the area and provide adequate canopy. However, these species are not resilient to high water intake. Therefore, our preference is to include species such as Melaleuca styphelioides (Prickly Paperbark) and Melaleuca quinquenervia (Broad Leave Paperbark) which are more suitable to a raingarden setting
- Zone 4 – Building Interfaces aims to provide landscaping around the building edges. Endemic trees should be selected over deciduous trees within this zone as they will provide greater resilience in high density area and offer similar flowering to deciduous species.

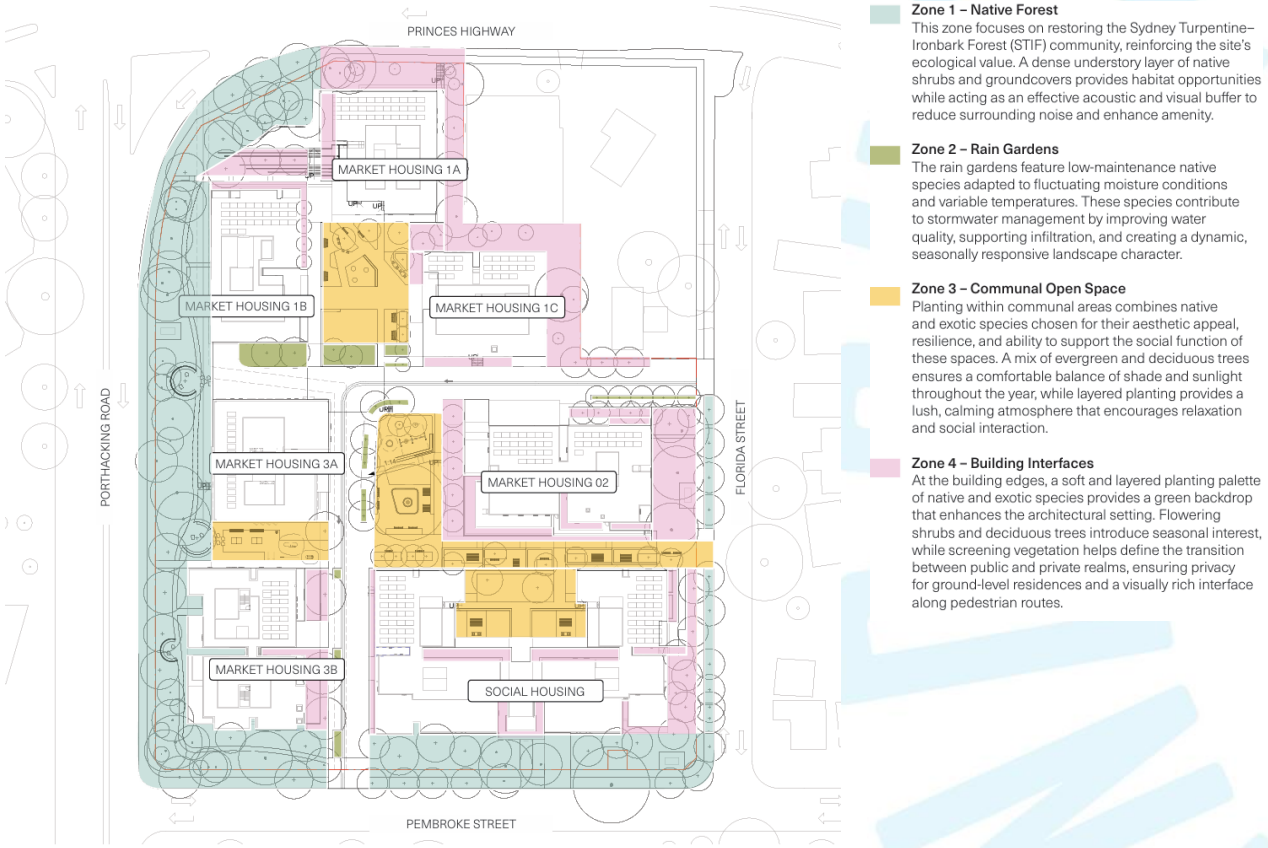

Figure 10 *– Extract of planting strategy.*

13. Waste Management

The bin generation rates across the site is considered acceptable. However, the waste facilities on site have been designed to be collected on the street and considering the size of the proposal, this arrangement is not considered acceptable. Waste collection is required via a suitable sized loading dock to facilitate a HRV size truck in accordance with AS2890.2. and should be integrated into the built form. To this end, the following matters are required to be addressed in relation to waste management:

<u>Social housing building</u>

- The distance between the truck and bin rooms needs to be less than 10m to ensure the truck can reverse to the door – the distance seems to be greater and is not supported.
- The driveway proposed to the waste room fronting Pembroke Street is not long enough to accommodate a parked waste truck. The driveway is required to be lengthened to ensure the public footpath is not obstructed when the truck is parked.
- The bulky waste room is not large enough to accommodate the number of residents within this building. The bulky waste room also needs to be located at the kerbside with a double door or roller door for ease of access.

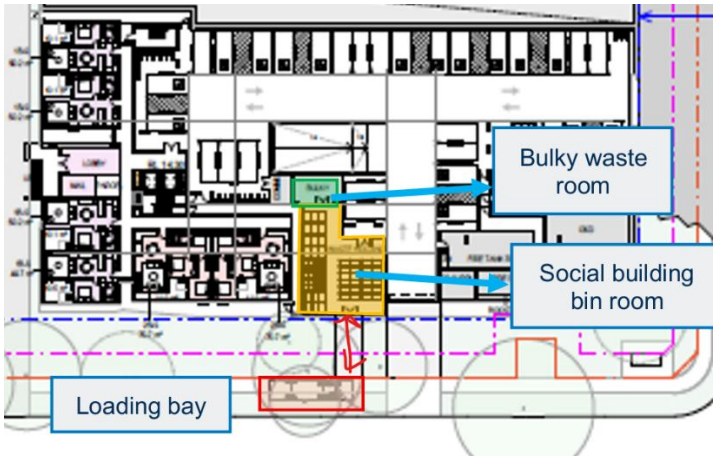

Figure 11 – *Extract of Level 04 showing location of waste rooms and loading bay associated with the Social housing building.*

Buildings 1A, 1B, 1C and 2

- The distance between the loading bay and the bin room doors would be greater than 10m and is not supported.
- The bulky waste rooms are considered a suitable size to service the residents. However, these rooms must be located at the kerbside with a double door or roller door to assist waste collection.
- The loading bay is located too far from the bin rooms and all bulky waste rooms

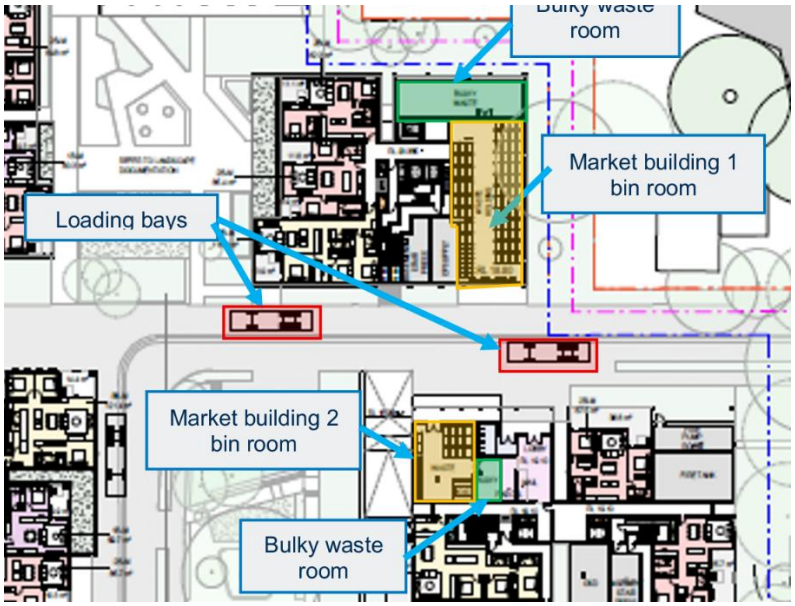

Figure 12 *– Extract of Level 04 showing location of waste rooms and loading bay associated with Buildings 1C and 2.*

Buildings 3A and 3B

- The distance between the loading bay and the bin room doors would be greater than 10m is not supported. It seems the bin room doors (which need to be double doors or roller doors) are located along the northern façade and the loading bay is located on the eastern façade of Building 3A. The loading bay is required to be relocated along the northern façade of the building to ensure the distance is less than 10m to the bin room doors.
- Amended plans need to provide a bulky waste room and need to be located at the kerbside to assist with waste removal.

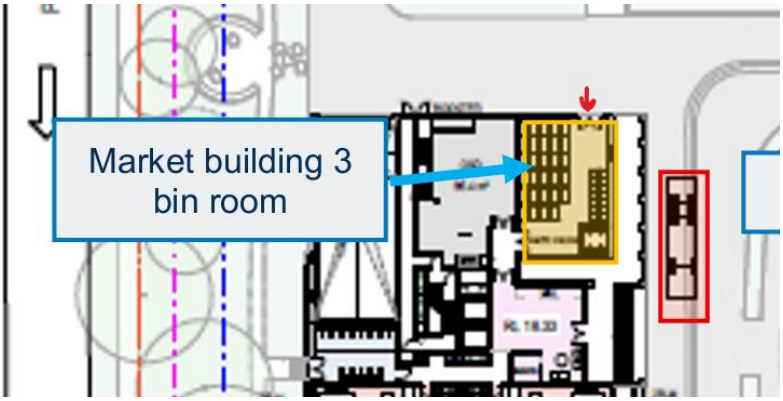

Figure 13 *– Extract of Level 04 showing location of waste rooms and loading bay associated with Building 3A.*

Please note that the Waste Management Plan prepared by MRA does not provide details or a clear strategy explaining how the waste chutes are designed to slow down waste as it travels through each building's chute. Further, the internal roads and any driveways that a truck needs to enter are required to be reinforced to carry a fully laden Heavy Rigid vehicle – gross weight of 24 Tonne.

14. Fire Protection

The fire protection strategy has been assessed against Division 4.3 Sections 4.15(1)(c), Section 4.15(1)(e) and Section 4.17 of the Environmental Planning & Assessment Act, AS2419.1:2005, NSWF&R document "Access for Fire Brigade Vehicles and Firefighters", and NSWF&R document "Fire hydrants for minor residential development". The following matters are required to be addressed:

- Fire Hydrant Services Report not provided. This Report should address / provide; associated Sydney Water Statement - Flow & Pressure, confirmation that a "suction" connection is not required, and the location of the required NSWF&R Appliance hardstand area and associated truck swept paths.
- The requirements of fire hydrants and substations must be designed into the development at the proposal stage, this includes any required hard standards that are negotiated with the Fire Service. Hardstands have the ability to impact trees and landscaping.
-
- Any road signage changes will need go to the Sutherland Traffic Committee prior to the issue of any Construction Certificate, as "No Standing" will be required for the full frontage of the property.

Conclusion

The provisions under Chapter 6 of the Housing SEPP have afforded the subject site a significant uplift in built form. However, the increased densities are considered incompatible with the current infrastructure realities and will impose unsustainable pressure on existing congested road networks, particularly high traffic volumes backed up along Port Hacking Road and turning onto the Princess Highway. Concern is raised that the uplift has been applied without any contextual specific study to establish how the additional building mass should be accommodated. This is currently driving a design response that is not contextually sensitive to the site.

The proposal should be considered as part of a development of the full suburban block, which should include a potential future-built form for the undeveloped site on the corner of Florida street and Princess highway.

It is requested that the Applicant's Response to Submissions is forwarded to Council for review prior to a determination being made.

Should you have any further enquires, please contact William Wolter on 9710 0718.

Sue McMahon
Senior Manager Development Services

Attachment A

Section 7.11 Contributions – Section 7.11 Development Contribution Plan 2020 – Sylvania Centre

Pursuant to Section 7.11 of the Environmental Planning and Assessment Act 1979, and Sutherland Shire Council Section 7.11 Development Contribution Plan 2020, a total monetary contribution of $6,500,000 must be paid to Sutherland Shire Council toward the cost of regional and local public domain works contained in the Works Programme of the Development Contribution Plan.

The contribution will be indexed on 1 July in each year in accordance with the Consumer Price Index (All Groups Index) for Sydney.

The formula to index a contribution rate is:

$$\textit{New Contribution Rate} = \textit{Current Contribution Rate} \times \frac{\textit{Current CPI}}{\textit{Previous year's CPI}}$$

Payment must be made prior to the issue of the construction certificate.

Condition reason: To ensure development contributions are paid to address the increased demand for public amenities and services resulting from the approved development.

Trees on private land

1. The removal of the following trees are approved:
    - (127) Trees identified on the approved Arborist Report as "trees removed"
    - Any declared noxious plant. The applicant is to ensure that all noxious plants are properly identified and controlled/removed.
    - Any tree species exempted by the Sutherland Shire Local Environmental Plan 2015.
2. All other vegetation that would require approval to be removed must be protected.
3. (127) trees are approved for removal as part of this consent. Where trees are proposed to be removed Sutherland Shire Council requires indigenous replacement canopy tree planting at a ratio of 8:1 on private land (Council Resolution EHR003-17 of 18 July 2016). The extent of compensatory planting has been reduced from (1016) to (744) due to the nature and condition of the species removed.
4. (93) replacement trees are required to be planted as shown on the approved landscape plan.
5. For the remaining (651) replacement trees required, council offers offsite planting under a 'Deed of Agreement' as an alternative to onsite planting, at a cost specified in council's schedule of fees and charges.

Offsite planting will be undertaken as part of council's Green Street Program. 'Deed of Agreement' forms can be downloaded from council's website at Off-Site tree replacement and Deed of Agreement | Sutherland Shire Council (nsw.gov.au)

A completed form and payment must be submitted to council prior to the release of the construction certificate.

Condition reason: To inform tree removal and replacement.

Street tree planting by Council

Street trees must be planted in the road reserve in front of the site. Prior to obtaining an occupation certificate, a fee must be paid to Council to undertake these works.

Call Council's Parks Operations Team on 9710 0333 to obtain an invoice for the cost of the planting of the following trees:

Number of trees	Size	Species	Location
##	**45L**	##	##

Fees and charges for street tree planting are subject to change and are set out in the current version of Council's 'Schedule of Fees and Charges', applicable at the time of payment.

The payment receipt must be provided to the principal certifier.

Condition reason: To improve the amenity of the street and contribute to the urban canopy.

Street tree by Council
Council must be appointed to remove and prune all tree/s on public land. All costs associated with these tree works shall be met by the applicant.

Prior to obtaining a construction certificate, the applicant must contact council, to be provided with a fee proposal/quote for the following tree works:

Tree Species	Location	Required Works
##	##	##

Council has preferred supplier agreements in place with arborists who are approved to carry out Arbor works on Council land. Relevant removal / pruning of the trees listed above must only be undertaken using Council's preferred supplier at the applicant's expense. The applicant is responsible for contract management and payment of the arborist prior to works being undertaken.

This fee proposal/quote must be paid to council prior to obtaining a construction certificate, with the receipt viewed by the principal certifier.

Condition reason: The fees payable ensure that the development makes adequate contribution to the management, protection & enhancement of urban tree canopy within the area.