CITY OF SYDNEY

City of Sydney
Town Hall House
456 Kent Street
Sydney NSW 2000

+61 2 9265 9333
council@cityofsydney.nsw.gov.au
GPO Box 1591 Sydney NSW 2001
cityofsydney.nsw.gov.au

27 March 2023

Our Ref: 2023/130275
File No: R/2023/8

Marcus Jennejohn
Senior Planning Officer
Department of Planning & Environment
Major Projects Portal

By email: Marcus.Jennejohn@planning.nsw.gov.au

Dear Marcus,

Harbourside Shopping Centre Redevelopment – Advice on SSD 49295711 – Podium and Tower

Thank you for your correspondence dated 14 February 2023 inviting the City of Sydney Council ("the City") to comment on the above application.

The application seeks consent for construction of a mixed-use development comprising a commercial and retail podium and a residential tower above (50 storeys in total); landscaping of the southern and central podium rooftops, and residential amenities; car parking and loading dock across 4 basement levels; stratum subdivision; localised detailed excavation for lift pits; new electricity infrastructure; and a signage strategy for the site.

The City has reviewed the submission and raises a number of issues, including breaches of the conditions set by the Independent Planning Commission (IPC) in their concept approval for the site which are required to be addressed prior to any determination. Detailed information regarding these matters is contained within the following sections:

1. Exclusion of public domain works
2. Proposed canopies and promenade width reduction
3. Ground level interface
4. Sculptural quality of the podium
5. Noise and ventilation
6. Floor to floor heights
7. Contamination
8. Wind impacts
9. Heritage impacts
10. Landscaping
11. Tree management

12. Ecologically sustainable development
13. Public Art
14. Signage Strategy
15. Transport and access
16. Waste arrangements

1. Exclusion of public domain works

The proposed development excludes the public domain areas including Waterfront Promenade, Darling Drive arrival area, pedestrian bridges and the Pyrmont Bridge approach. The City does not agree with the exclusion of these works as part of the subject detailed design SSD (referred to as SSDA 2 in the EIS) and the deferment of these works to a separate application (SSD-49653211, referred to as SSDA 3 in the EIS) which is yet to be lodged.

Connectivity to surrounding areas from the development should be considered at each stage so that accessible paths of travel, urban tree canopy, wayfinding, materiality and stormwater and flooding issues can be addressed that will inform aspects of the building design.

Particularly relevant is the issue of floor levels in respect of flood planning. The flooding report appears comprehensive and provides an assessment of the flood planning levels. It appears many of the floor levels don't comply - e.g., point N10 requires an FPL of RL 4.05, however the floor level is RL 3.00. This requires clarification.

Although all affected frontages are on land owned by Place Management NSW, the City recommends that the public domain is designed to be consistent with the City of Sydney Streets Design Code where frontages might reasonably be expected by the public to be under the control of or consistent with the City of Sydney.

2. Proposed canopies and promenade width reduction

The proposed ground floor plan shows the 5m canopy structure projecting beyond the approved concept envelope as determined by the IPC. The building envelope established in the Concept Approval is a 3D volume that defines the outermost part of the site that a building can occupy. The proposed modification to the Concept Approval that is concurrently being assessed seeks to exclude these awnings from the concept envelope via condition. The subject detailed design SSDA indicates that the canopy and its associated columns project beyond the boundary lines for both the concept envelope as well as the detailed design SSDA extent. Level 1 also appears to project beyond the concept envelope boundary by approximately 1.5m.

The City does not support the extension of the canopy outside of the concept envelope and into the public domain. The approved promenade is approximately 20m wide to the building envelope line. The proposed canopy reduces the promenade to 15m and while this structure is not floor space, it is part of the building that services the associated retail uses and is raised and separated from the promenade reducing the amount of space available to the public. Further, a contributing key factor of the proposal at the design competition was its contribution to the public domain rather than licensed areas.

The City raises no objection to the design of the canopy, however, it should be provided within the concept envelope and not reduce the width of the promenade zone from what was approved despite any side agreement for licensed seating that may be taking place.

Any changes to the Concept Approval to accommodate the 5m wide permanent canopy area is not supported beyond the envelope in this location. As the canopy sits outside of the subject detailed design SSDA boundary line, it is also to be clarified if it forms part of this application or the later SSDA 3.

3. Ground Level Interface

There is no objection to the 'kit of part' façade options approach for the ground level retail. There are four arrangements documented with varying degrees of solidity.

However, the City recognizes the risk that Type 4 may be the only shopfront desired by the retailers, which will detract from the carved sculptural idea for the podium that was key to the scheme prevailing at the design competition. The de-materialisation of the ground level is further exacerbated by the southern retail precinct, where the shopfronts are predominantly glass and appears to have light weight metal elements.

If each shopfront type had a minimum proportion of solid elements, then this could contribute to the overall solidity of the podium. This risk should be managed through an appropriate condition or redesign.

4. Sculptural Quality of the Podium

As noted above, there are four façade arrangements proposed. These four façade types have different combinations of solid (GRC), glass (fritted and transparent) and horizontal shading devices (material not clearly described).

The submitted design report provides the locations for the four façade types and describes the façade types as responding to the different conditions. However, it is not clear if these conditions include orientation as this would provide some rigour and order to the location of the façade types, that is one façade type on the eastern façade, for example.

The shading is the same depth regardless of its location and orientation on the building and it is not clear if sufficient shading has been provided to the glass in both the podium and the tower. The City requests that 1:20 details be provided prior to approval for the different façade types showing the depth of the shading.

There is insufficient information on how the façade types meet at the corners. The corners are prominent and the change in façade types at the corners will need to look intentional rather than accidental. This is especially relevant where the glassier façade type meets the more solid GRC façade type. The City request that corner junction details are to be provided in 3D detail.

The façade types, materials and finishes require coordination and consistency between the design report and the architectural package. The elevations only identify two façade types; the podium and the tower, despite the four façade types that comprise the podium. If relying on the architectural package alone, it would be fair to think that a singular expression (FA-01) was being proposed for all elevations.

The proposal comprises a large development with a limited palette of materials. The idea of the carved sculptural sandstone at design competition stage has been eroded by the large areas of glass in the office podium and ground level. There is an opportunity to increase the amount of solidity in the podium elevations and this will help provide a contrast to the lighter expression of the tower and its idea of a fishing net.

5. Noise and ventilation

The submitted acoustic report refers to the criteria in relation to busy roads, despite the residential part of the development being 250m away from the nearest busy road that will not make up a significant part of the noise background at the residential units. The report has predicted that the residential units will meet the noisy road acoustic criteria and Apartment Design Guide (ADG) criteria for ventilation. An appropriate criterion is Section 4.2.3.11 of the Sydney DCP 2012.

Further information is requested to predict the impact of neighbouring noise sources on the future occupants of the future residential units and recommendations to meet the above criteria and meet the requirements of the ADG.

6. Floor to Floor Heights

It is understood that increased tower envelope height (from IPC-approved RL 166.95 to RL 170) sought under the modification to the Concept Approval that is concurrently being assessed, is to allow for compliance with the increased floor to floor height requirements proposed within the National Construction Code 2022 (NCC 2022).

The subject detail design SSDA provides for floor to floor heights of 3.175m for the tower residential levels, however floor to floor heights of 3.2m are understood to be required under the NCC 2022 changes.

The Pyrmont Peninsula Place Strategy nominates a maximum height of RL170 for the site. This maximum height must not be exceeded in accommodating the required floor to floor heights. Therefore, the proposal will be needed to be amended to demonstrate compliance or the removal of a storey.

7. Contamination

The preferred remediation strategy in the submitted remedial action plan (RAP) is for removal and disposal of contaminants, which has been endorsed by the Site Auditor.

The letter of interim advice prepared by Melissa Porter of Senversa is dated 6 months before the RAP provided by JBS&G and relates to an earlier RAP, which is not present with this application.

Whilst it is likely that the recommended remediation strategy will not have significantly changed, the City wish to review it and request a letter of Interim Advice or Section B Site Audit Statement from an NSW EPA Accredited Site Auditor to endorse that the remediation strategy within the current RAP will make the land suitable for the proposed development.

8. Wind Impacts

The submitted wind report identifies some areas on the Level 5 podium that are uncomfortable or exceed the comfort criteria for walking, that is >6m/s. These points then correlate to locations where the safety criteria can potentially be exceeded. So, while the pool area is not affected by >24m/s gusts of wind, it is unlikely to be used in these conditions as it will not be possible to access these areas of the Level 5 roof garden due to the strong wind gusts at the interface of the building and the podium roof garden.

Mitigation measures have been recommended however the report does not identify how much these measures will reduce the wind impacts. Furthermore, some of the mitigation relies on planting which struggles to thrive in a windy environment. It is also unclear from the drawings if the recommended measures have been incorporated to the design and if they will have a further impact on views etc.

The through-site links have some unsafe conditions associated with them both along the promenade and along Iron Wharf Place. While point 133 has been identified as exceeding the safety criteria of 24m/s the surrounding points (for example 129, 131, 132,136, 137,138, 139 etc.) all have wind gusts greater than 22m/s which affects the useability of the area by people of all physical abilities along the promenade.

Iron Wharf Place has a greater intensity of points that are unsafe. Points 72-76 are noted in the table as exceeding the wind safety criteria. The proposal increases the number of points affecting Iron Wharf Place and this will affect pedestrian amenity.

The wind report is to provide recommendations for the wind mitigation of the promenade and the Iron Wharf Place, and all recommendations in the report are to be adopted, subject to there being no view loss impacts as a result of the wind mitigation devices.

9. Heritage Impacts

The following heritage matters are to be addressed:

a) Southern edge of western approach of Pyrmont Bridge:

The southern parapet of the western approach of Pyrmont Bridge was modified in 1980s. The original approach had a similar width to the bridge and the southern parapet was largely parallel with the northern parapet which remains unchanged today. The lower section of the southern parapet and piers were demolished and reconstructed to the further south of its original location to accommodate the connection with Harbourside shopping centre. The stone wall, marked as the existing heritage wall in the proposed plan, falls outside the curtilage of Pyrmont Bridge in the SHR listing.

The proposed redevelopment provides an opportunity to reinstate the modified wall to its original location. A reinstated southern wall will be able to restore the intact form of the western approach and make a clear definition of the original bridge. It can also avoid the steps currently being proposed on the bridge which are considered not in keeping with the original use and design of the bridge. Openings for pedestrians can be made on the reinstated stone wall to the connection to the proposed garden on top of the northern podium.

The City recommended that the southern parapet of the western approach of Pyrmont Bridge be reinstated, and the proposed connecting steps should be located outside the curtilage of the bridge.

b) Heritage interpretation strategy:

The submitted heritage interpretation strategy is a Stage 1 concept which only provides interpretation principles and identifies just the potential locations and product options.

The report states that the specific interpretation content and products will only be prepared during the construction phase of the development.

As heritage interpretation needs to be coherently incorporated into the architectural, landscaping, public domain and public art designs, the detailed heritage interpretation should be developed in the development design stage rather than construction stage. If some interpretation contents cannot be finalised before the subject SSD consent, a reference interpretation plan, specifying interpretation locations and contents, setting out the minimum requirements of the interpretation, should be prepared before the consent of SSD or commencement of new construction works.

It is recommended that a detailed stage 2 heritage interpretation plan is to be prepared and reviewed by the City.

c) Archaeology:

The City request that copies of any archaeological excavation final reports are to be submitted to Council so that they can be added to records of our local heritage and historical studies.

10. Landscaping

The proposed development includes greening in a complex design located entirely on structure. Despite the extent of greening and complexity, the submitted landscape plans are indicative zone plans with plant schedule, legend and selected green roof details only. The City requires the submission of a coordinated amended design that demonstrates landscape design excellence and resolves the matters outlined below.

a) Inaccessible green roofs to southern podium:

Inaccessible green roofs across Level 4 and 5 are co-located with solar panel zones, energy, plant and cooling towers. The green roofs will create a diverse habitat using native and indigenous species and contribute biodiversity to the site and local area, which is supported.

The general arrangement plan indicates two zones, with a 600mm wide perimeter maintenance path (type unknown) set back from the parapet. However, there are no levels (RL, SSL, TW) for the parapet, maintenance path, green roof to demonstrate the design, potential fold in the slab between two levels. It is unclear if the energy and plant zones are fenced off and the final layout of the solar panels. It is unclear if rainwater harvesting for irrigation reuse on the green roofs and other greening across the site is proposed and the location of rainwater tanks in the basement.

The plan for the southern green roof includes a caveat annotation and hatched zone at the parapet edge of the green roofs (and steep folded green roofs) noting, *"Indicative location for roof maintenance access jockey rail and fall restraint, type, location and requirements subject to design coordination, safety and engineer review."* This suggests that green roof maintenance and safety in design review with engineers is unresolved.

The City requires the following information/clarification:

- Location of PV02 in plan is unclear on southern podium green roofs.
- Clarification is needed for the proposed maintenance access, proposed safety system working at heights for the inaccessible green roofs on the southern, central podiums.
- Will a jockey system at the parapet edge result in contractors clipping on and walking up and over roofs trampling plants?

- Clarify the frequency of maintenance, how green waste is removed from the building and if green waste will be composted on site.

b) Grow on plant supply contract and tree pot size:

A diverse indigenous and native plant palette proposed for the green roofs and other greening across the site. The City queries whether plant supply will be a grow on contract to supply the large quantities and for replacement.

Proposed trees range in pot size from 45L to 600L, with the majority 200L. A 45L tree will be juvenile and unlikely to reach maturity within 10 years completion to contribute to urban canopy targets. The minimum tree size accepted at installation will be 75L at installation.

c) Green roofs on folded and steep facades to east and north:

The sections in the architectural plans do not clearly make allowance for soil depth for the proposed landscaping and “folded landscape”. East and north elevations and section H indicates folded landscape on inaccessible and steep slopes at approximately 45 degrees.

The folded facades result in a “greened edge” to disguise the building and must demonstrate a feasible design that is not ‘green washing’. Accessible green roofs must remain accessible for the lifetime of the property. The green roofs will be highly visible from many vantage points in Darling Harbour and must be designed to succeed, be able to be safely accessed and maintained post construction and replaced if they fail.

The City requires more information on the webbing tendon, jockey rail and fall restraint system, how steep slopes will be accessed for maintenance post construction without trampling on plants.

Landscape green roof details indicate a proprietary green roof system however, no manufacturers specification has been submitted making it difficult to assess the feasibility of the design. Further details indicate a webbing cell anchoring system that relies upon a webbing cell system tendon secured on upper side to structural slab or support system and base that runs through the centre of the soil media. The extent of greening to raked planting on steep slopes up to 1:1 (45 degrees) and berms is unclear.

The following information/clarification is required:

- Clarify the inconsistency between the legend and details, soil depth is either 200 or 300mm depth.
- At 45 degrees, will mulch erode from the roof onto public domain pathways at the harbour’s edge and Waterfront garden?
- How are 140mm pots installed into the soil media without damaging the tendon?
- How are the roofs installed and maintained for the life of the property?
- Submit an outline landscape maintenance strategy plan that demonstrates the greening can be installed and maintained on an ongoing basis, including green waste removal.

d) Communal open space:

The range of high-quality amenity proposed for residents and the overall greening of the Level 5 central podium indicated by architect photomontages is supported in principle, subject to design clarification and more information to demonstrate: levels, pool fencing, design of landscape and trees on structure meets the requirements of the Sydney Landscape Code; that the design accounts for wind impacts from the tower and locality; and that it can be safely accessed and maintained. Refer to the points below:

- There is insufficient information drawn and levels information to confirm the location of planter walls, heights, if planters rely on a set down in the slab to provide a minimum 1m soil depth and adequate soil volume to support each tree proposed. The design of all planters within the communal open space are to meet the Sydney Landscape Code and ADG requirements for soil depth and volume, without a reliance on excessive mounding to create planters on slab capable of supporting tree growth to maturity for shade, amenity and cooling.

- The legend on the plans notes wall type 3 varies in height, and there are insufficient levels (RL, SSL, TW) to demonstrate the proposed planters on structure in the communal open space provide adequate soil depth and soil volume per tree to support healthy growth to maturity.

- The location of the pool fence to west is unclear. Clarification is required if a gate is needed near the ramp.

- Planted areas outside of fences will be inaccessible sloping landscaped northern berm to northern edge of communal open space. There is insufficient detail, levels, sections to demonstrate the design, soil depth and how these areas will be access and maintained.

- The eastern terrace includes wind mitigation screens for the Level 5 eastern terrace, that are to future detail. The City query what this design is and if this results in awnings and less trees, shrubs and greening.

- The use of the podium is cognisant of or protected from falling objects from the tower impacting with people using the podium.

e) Design of landscaping on slab:

The success of landscape on slab requires great design, coordinated services, soil depth and soil volume, drainage, watering systems and ongoing maintenance.

The competition scheme won in part for the integrated landscape throughout which is reflected in numerous photomontages contained within the design report. The City supports an integrated green and verdant place however, the design report and landscape plans do not provide adequate information to demonstrate a feasible design.

The Level 5 communal open space plan locates small and medium sized trees in planters. Photomontages indicate there may also be trees on the eastern terrace.

It is unclear if the design relies on mounding for trees on structure to achieve required minimum 1m depth, and allowance for soil volume per tree is not demonstrated. As a guide, soil volumes to support trees on structure are:

- Small sized tree 9m3 per tree

- Medium sized tree 35m3 per tree
- Large sized tree 150m3 per tree

Soil is organic and subsides over time, which can result in bare root balls and plant failure. Mounding up to maximum 200mm is acceptable at installation. The following is recommended:

- Review the design of all planters and freestanding pots, to ensure landscape areas on slab achieve the minimum soil depths and soil volumes in accordance with the Sydney Landscape Code and ADG.
- Provide updated plans with levels (SSL, RL, TW), sections and typical details and confirm the soil volume for all new trees.

f) Crown trees:

The proposed scheme has open-to-sky residential terraces wrapping the north and eastern perimeter of the tower crown for the penthouse apartments with trees in planters, providing shade to residents and a planted crown viewed from the public domain.

Level 48 terraces will be subject to wind impacts and potentially desiccation. The design of trees in planters must make allowance for adequate soil volume to support the trees and species selected for robust and hardiness suited to the microclimate.

11. Tree Management

There are ten existing *Livistona australis* (Cabbage Tree Palms) surrounding the proposed development site. Nine of these trees are located along the waterfront promenade and one tree is located 50m to the south. Another ten Cabbage Tree Palms are located to the north also adjacent to the waterfront promenade forming a continuous row. A further ten Cabbage Tree Palms are located as part of a planting group to the southwestern corner adjacent to the site.

It has been noted that Condition B7 of the Concept Approval (SSD 7874 (as amended)) states *'…that If determined to retain trees following exploration under Condition C15(f), a Transplanting Methodology Report addressing transplanting of the 20 existing cabbage tree palms for use in future public domain on site must be prepared by a suitably qualified Arborist with 10 years' experience and submitted to Council for approval.'*

A transplant method statement to address Condition B7 for the proposed transplanting and protection of the 20 Cabbage Tree Palms located along the waterfront promenade and adjacent to Darling Drive is required. However, the current plans do not indicate that the transplanting of these trees and the waterfront promenade area are part of the current stage of works (likely at SSDA 3).

Noting that any current and future works that will impact these trees, Condition B7 shall be implemented to ensure the retention and protection of these trees. A tree protection specification plan shall be provided with the current and any future development application prepared by an experience and suitably qualified AQF level 5 Arborist and written in accordance with the Australian Standard AS4970 'Protection of Trees on Development Sites' for all trees surrounding the site. The specification plan shall ensure all trees are retained and appropriately protected during any current and future construction works at the site.

12. Ecologically Sustainable Development

The development has been proposed with several high-level sustainable design and performance targets. The following requirements are to be addressed:

a) NABERS – Energy:

The development has outlined a NABERS Energy rating of 5.5 Stars with a 25% margin for the site, which is in line with City requirements. It is required that the development provides a NABERS commitment agreement specifying the 5.5 Star target rating.

b) NABERS – Water:

The development has proposed a minimum NABERS water rating of 3.5 stars with stretch targets of 4.0 stars and consideration of 4.5 stars. The 4.0 rating for the development should be prioritised, given the size of the site and potential for water capture and reuse in commercial facilities.

c) Green Star ratings:

The development has outlined a commitment to building electrification outside of emergency generators. This is reflected in reporting for both the commercial and residential components of the development, with electric heat pumps for water heating and 1 phase space cooling and heating proposed. The proposal has also outlined a commitment to utilising 100% renewable electricity and developing a Net Zero Carbon Action Plan. The development also has rooftop solar for the site, with part of the capacity included in the BASIX report.

The one lingering use of gas on site has been proposed to food and beverage outlets in the commercial component of the site. It is recommended that this be removed from the design, especially with growing acceptance of induction or electric cooking in the commercial industry. This would be seen as a positive outcome for the project in sustainability and indoor health and amenity.

The solar PV is required to be appropriately annotated on the plans with space requirements and system capacity.

d) Water:

The proposal has referenced a number of positive water features including stormwater management, efficient fixtures, rainwater capture and reuse, water-efficient water-based heat rejection systems, and other strategies to be further explored during the design development. This is vaguely covered in the submitted ESD report and rather non-committal in the language used. However, it seems to be captured in the BASIX certificate and the proposed NABERS water rating should ensure implementation of this. The proposal has also outlined water capture for the commercial and consideration for the residential component.

It is required that all proposed tanks are to be shown and fully annotated on plans, including space requirements and designed capacity.

The BASIX certificate has not proposed rainwater tanks. This should be reconsidered in detailed design.

e) BASIX and NatHERS Reporting:

The BASIX and NatHERS reporting has been provided to a high standard with the certificate reflecting the design initiatives proposed in ESD reporting. Additionally, the site achieves a 7.8 Star NatHERS rating which is a positive outcome. The plans are required to meet BASIX plan marking requirements. NatHERS thermal specs have been provided as required. However, additional detail is sought around BASIX certificate specific plan markings, including solar, energy, water efficiency annotations.

13. Public Art

The submitted public art strategy is overly descriptive of the benefits of the public art, of the objectives, themes and principles for the program, and identifies numerous locations for public art. Given the significant Connecting with Country framework underpinning the strategy, it is recommended that public artwork opportunities are focused on local Aboriginal and Torres Strait Islander artists, and that a shortlist of these artists is identified and paid a fee to develop concepts for the primary opportunities.

The following is required:

- Presentation of a highly condensed version of the strategy to the City of Sydney's Public Art Advisory Panel on Tuesday April 4, 2023 (a later date can also be advised).
- Incorporate the Panel's advice into artist's briefs and future detailed public art plan.
- Revise the public art strategy prior to any Construction Certificate and submit the detailed public art plan to the City for review prior to submitting the plan for approval and issuing of the relevant Construction Certificate by the consent authority.

14. Signage Strategy

The proposal includes a signage strategy for the design parameters and principles for the future installation of signage at the site. Signage zones are sought for building tenant signage, building entry signage, car park entry signage, retail tenancy signage, amenity signage and glazing graphics.

The City considers the extent of the proposed tenant façade signage to be excessive in size (1.8m in height and varying widths including up to 11m) and amount (12 in total), located across both the east and west elevations.

The proposed signage should be designed in accordance with the requirements of Section 3.15 of the Sydney DCP 2012.

15. Access and Transport

The following access and transport matters are to be addressed:

a) Car parking:

Regarding the proposed 30 commercial car parking spaces, the Sydney 2012 DCP rate of 1 per 20 parking spaces is to be allocated for accessible parking (2 spaces in total) rather than the BCA rate of 1 per 100, as well as the Sydney DCP 2012 rate for motorcycle parking (providing 10 motorbike spaces for commercial use).

b) Loading:

The proposed loading provision is not sufficient. Given the GFA and mix of uses, the Sydney DCP 2012 requires 30 loading spaces (4, 10 and 16 for residential, commercial and retail respectively). The development proposes 16 spaces which is only half the required amount. TfNSW's Urban Freight Forecaster similarly recommends a total of 25 spaces (15 van, 7 SRV and 3 MRV/HRV spaces).

The City considers the loading provision to be a much higher priority use of basement space than private vehicle parking, and as such expects that adequate loading spaces are provided before any space is dedicated to private vehicle parking.

The proponent has provided justification based on other Mirvac properties why the lesser loading proposed is appropriate. However, the City maintain that compliant Sydney DCP 2012 rates be provided to avoid overflow onto surrounding streets.

c) Vehicle Access and Layout:

The B02 level swept paths show that there is not sufficient room for a B85 and B99 vehicle to pass each other in one of the aisles. The aisle should be widened to allow this manoeuvre, which may require removal of some parking spaces.

d) Bicycle Parking:

With regard to the proposed bicycle parking, the following comments are provided:

- Resident: The proposal applies the Sydney DCP 2012 rate of 1 space per unit, resulting in 290 spaces which is supported. It appears that the residential bike parking is combined with the general storage which may be acceptable, however please confirm that the dimensions allow for a standard bike (Australian Standards use 70cm x 170cm). These must be provided as Class 1 (lockable) spaces.

- Residential visitor: The proposal applies the Sydney DCP 2012 rate of 1 space per 10 dwellings, resulting in 29 spaces which is supported. These must be provided as Class 3 spaces in an accessible on-grade location.

- Commercial/retail employee: The proposal applies the Sydney DCP 2012 rate of 1 per 150sqm and 1 per 200sqm for commercial and retail employees respectively, which results in a total of 278 employee spaces which is supported and should be provided as Class 2 spaces. Please allow for 5% non-standard bikes (cargo, three-wheeler etc.).

- Commercial/retail visitor: It is understood that these will be included as part of SSDA 3. These spaces must be provided as Class 3 spaces in an accessible on-grade location.

e) Traffic Impacts:

In the submitted traffic assessment, the growth rate adopted for background traffic growth only considers growth years providing an annual rate of 1.08%. The data presented in the transport report when visualised illustrates a decreasing background traffic environment, even pre-pandemic. A zero-growth assumption should be used for the conservative case.

16. Waste Arrangements

The submitted architectural plans do not adequately address the City's operational waste management needs, which is not supported. The building design must ensure that the collection of residential waste complies with the City's waste collection contract which requires that bins are to be presented with 10m of the back of the collection vehicle.

Key issues that are required to be resolved include:

- Residential waste bins are to be presented for collection within 10m distance of the Council waste truck at the loading dock. Space must be provided for all residential 1100L waste bins in the loading zone. Given the size of the development, Council will allow for 2 collections per week which will reduce the space required for bins to be presented at the loading zone.

- Waste space calculations and the waste management plan should be based on the whole precinct requirements once the whole site is developed, if there is only one proposed loading dock and waste storage area.

- Given the timeframe for when the development will be finalised, it is requested that the facility accommodate Council's current MRV collection vehicles which are 10.6m long.

- Residents must have access to a bulky waste storage space that is clearly marked on the plans.

- Consideration should be given to onsite organic processing options to reduce waste collection vehicles to the site and meet the State Government's objective to divert organic waste from landfill.

- Retail waste storage requirements should be based on 1/3 of the premises being food outlets given the nature of the development as an entertainment precinct. Waste storage spaces should be drawn on the plans as calculated and required in the waste management plan.

Additional comments are provided as follows:

- Waste storage space:
    - The plans do not provide enough bin space for the calculated waste generation for the site. The plans should include the following:
        - The number of bins required correctly scaled (to distinguishing between sizes e.g., 240L, 660L, 1100L) and the proposed layout of bins within in the designated waste storage areas.
        - The design should be reflective of the collection frequency required by Council.
        - The dedicated space for separate individually bulky waste and problem waste storage areas for residents and commercial waste should be clearly marked on the plans. The minimum space required is outlined in Council's Guidelines for Waste Management in New Developments 2018.
        - Additional space of 2sqm should also be provided in the residential waste storage area for a clothing recycling bin.

        - The path of access for both users and collection vehicles, and the nominated waste collection point(s) for the site should be shown on the plans.
    - Commercial waste and recycling receptacles must be stored in a separated area from residential waste and recycling receptacles and commercial tenants must not have access to residential bins or waste rooms.
    - Council does not support compaction of residential waste, as it creates issues relating to weight, handling and overall life span of bins. City-supplied bins are not suitable to be used with compaction devices. Residential developments that propose waste compaction will be responsible for any ongoing maintenance, repair and replacement costs of the bins. The waste management plan is to clarify the method of compaction and whether compaction occurs above bin to reduce damage to Council bins.
    - Doorways to bin collection area(s) and any goods lift(s) must fit the size of bins proposed for use in the waste management plan. Dimensions of standard bins available for use are:
        - 1,100 litres – 1370mm wide x 1245mm long
        - 660 litres – 1370mm wide x 850mm long
        - 240 litres – 580mm wide x 730mm long

- Collection and servicing:
    - The proposed residential collection methodology in the submitted waste management plan is unclear and requires further details:
        - No temporary holding area for residential waste was identified at the loading zone (including bins and bulky storage space). This must hold all residential bins on day of collection and be marked on the plans.
        - The maximum travel distance between the storage point (either through temporary holding area or the waste storage area) and rear of the truck for all waste and recycling bins and bulky waste shall be no more than 10 meters.
        - Additional detail is required as to onsite collection arrangements for commercial and residential bins.

- Chute system:
    - Chutes must be installed within chute rooms and be accessible, not adjacent to a habitable area, contain 1 spare MGB for each waste chute in case of chute failure. The waste management plan must provide details of the ongoing management of the chute systems including bin transfers, rotation and arrangements for periodic servicing or chute failure.
    - The dual chute system must be installed within a chute room on every residential floor. They must be accessible, not adjacent to a habitable area, contain 1 spare MGB for each waste chute in case of chute failure.
    - The waste management plan must provide details of the ongoing management of chute system including bin transfers, rotation and arrangements for periodic servicing or chute failure.

- No residents are to have access to the chute discharge room. This room should be separated from the garbage room or caged off, so residents on the ground level can use the garbage room to dispose of waste/recycling.
- The total maximum travel distance from any residential dwelling entry to a chute system on any given storey is not to exceed 30 metres. Additional chutes may be required for buildings in order not to exceed the maximum travel distance.

- Loading dock:
  - The loading dock management plan is to stipulate that *'unimpeded access will be provided for residential collection vehicles to set down within 10 meters of waste storage area(s) between 6am and 6pm on collection day(s)'*.

- Additional information:
  - Commercial and residential waste service collections and waste storage arrangements must be conducted in accordance with the City's Waste Policy – Local Approvals Policy for Managing Waste in Public Places (2017).

Should you wish to speak with a Council officer about the above, please contact Mia Music, Senior Planner, on 9265 9333 or at mmusic@cityofsydney.nsw.gov.au.

Yours sincerely,

Graham Jahn AM LFRAIA Hon FPIA
Director
City Planning I Development I Transport