

28 August 2024

Our Ref: 24/238502
Our Contact: Robert McKinlay (02) 9366 3724

Ms Jennie Yuan
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Yuan

RE: Exhibition of Modification 4 to SSD-11429726 at 161-173 Princes Highway, Arncliffe

Thank you for the opportunity to provide comment on the fourth modification for the Mixed Use Redevelopment at 161-173 Princes Highway, Arncliffe (the site). Council is currently negotiating with the proponent to acquire the community facility space. The proposed modification comprises:

- *Provision of a 1,634m² multi-purpose community facility cold shell on the lower and upper ground floor of the Building A and B podium;*
- *Relocation of apartments from the Building A and B podium to the Building A and B towers to accommodate the community facility;*
- *Unit mix adjustments, predominantly to Building A to meet the requirements of the affordable housing provider St George Community Housing;*
- *Design refinements to the 'Meeting Place' plaza, 'Moving Place' public space, and northern through-site link;*
- *Amendments to building façade design following further development and coordination; and*
- *Amendments to floor levels to comply with the National Construction Code 2022.*

The following issues have been identified with the specifics of the proposal:

Community Facility and the Pedestrian link

The inclusion of the community facility provides a positive contribution to the Eden Street precinct and the broader community.

Postal address

PO Box 21, Rockdale NSW 2216
ABN 80 690 785 443

Bayside Customer Service Centres

Rockdale Library, 444-446 Princes Highway, Rockdale
Westfield Eastgardens, 152 Bunnerong Road, Eastgardens

E council@bayside.nsw.gov.au

W www.bayside.nsw.gov.au

T 1300 581 299 | 02 9562 1666

The community facility has been located with direct access to the public domain along the site's northern boundary. Developments have been made to the northern cross site link to connect to the community facility and in principle these are positive developments.

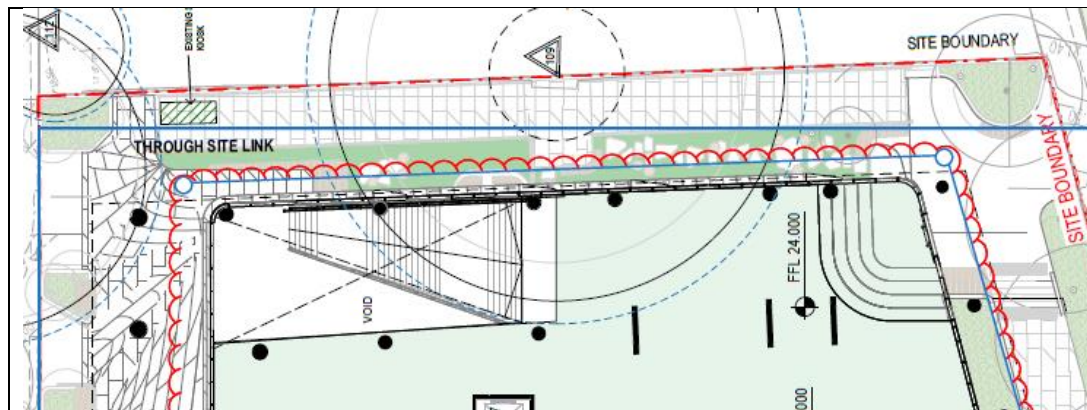


Figure 1: Through Site Link

Source: Upper Ground Floor GA Plan, GroupGSA.

However, detail resolution of community facility layout should seek to maximise casual surveillance / activation of the pedestrian link.

Community Facility – Bathroom Layout and Structural Columns

Some elements of the facilities are shown in detail on the proposed architectural plans. Council is still negotiating with the proponent over details relating to the fit out and therefore it is not appropriate for the bathroom layout to be shown at this time. This level of detail will be resolved as part of a future approval.

The plans should be amended to remove all detail showing the layout and features of the community facility bathrooms.

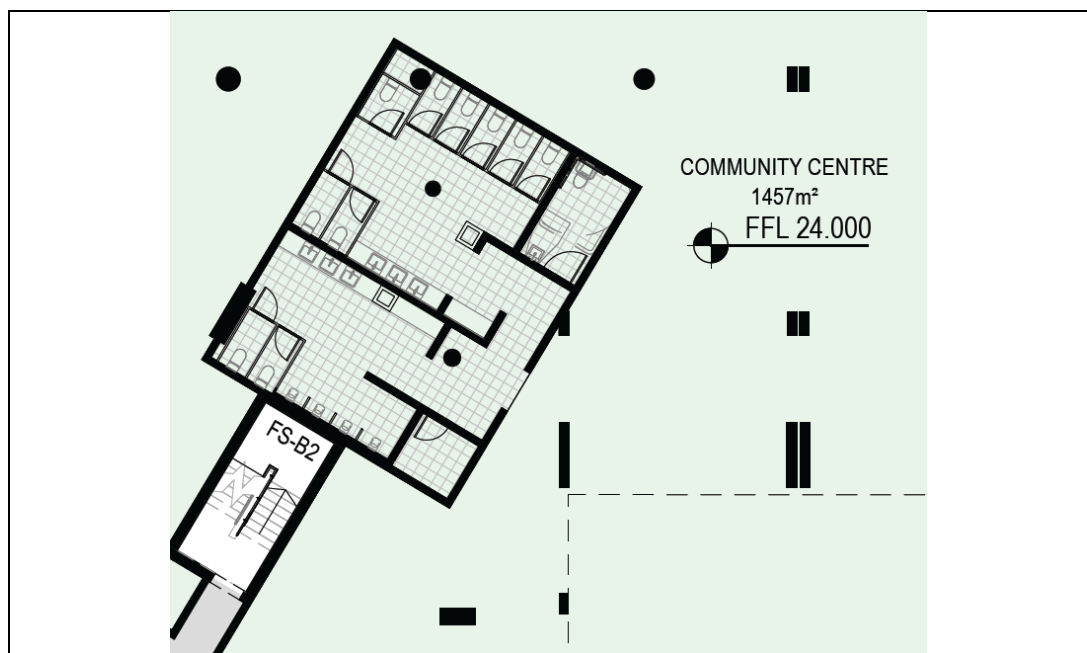


Figure 2: Community Centre Bathrooms

Source: Upper Ground Floor GA Plan, GroupGSA.

Design refinements to the 'Meeting Place' plaza, 'Moving Place' public space

The realignment of the central retail mall has assisted in providing a more direct connection between Eden Street and the Princes Highway.

An increased area of retail space has been developed within the meeting space, effectively reducing the extent of public domain. The space now appears to be a generously proportioned external circulation area, rather than a functional public square.

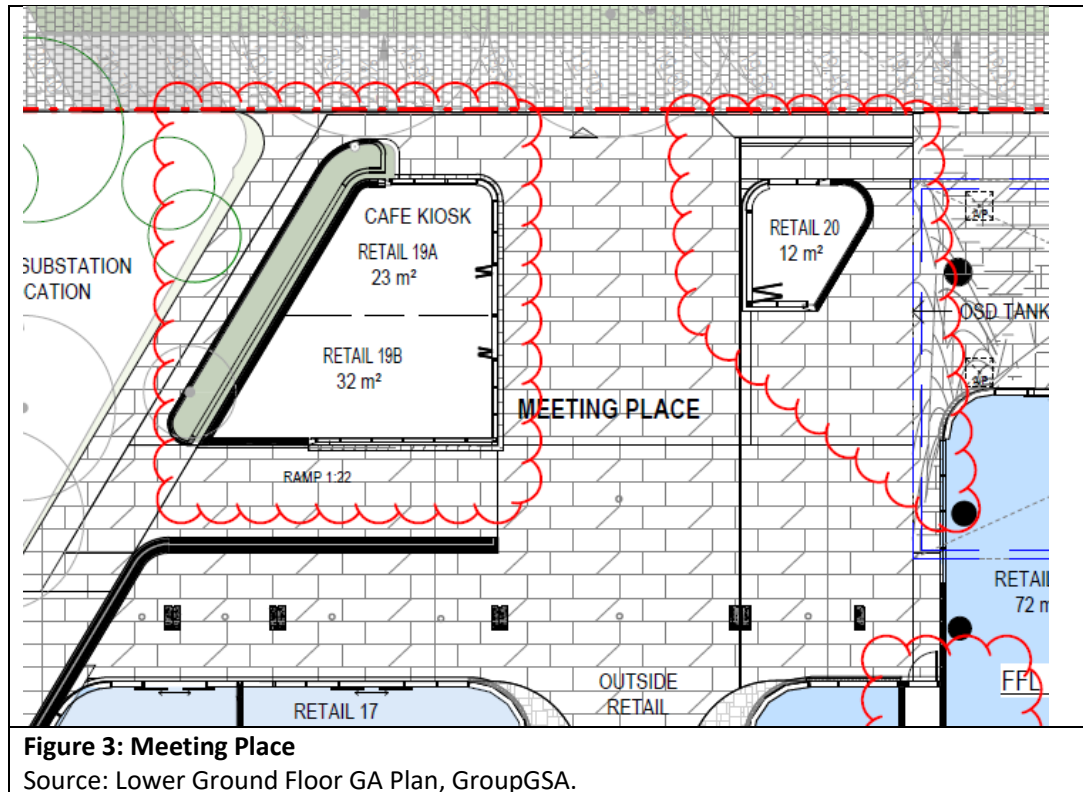


Figure 3: Meeting Place

Source: Lower Ground Floor GA Plan, GroupGSA.

Any built form interventions within this space should be minimal in footprint and have a use consistent with the nature of the meeting space. A small kiosk / café could provide a positive contribution to the space, whereas a general-purpose retail tenancy would detract from the quality of the space.

Visitor Parking

The proposal maintains a rate of 1 visitor parking space per 9 residential units, which is consistent with the approved MOD 3, but does not meet the requirements of the ADG. Council's Traffic Engineers acknowledge that the applicant has provided a Traffic Study supporting the proposed rate of provision, but also highlight that access to car parking is a specific priority of Council as set out in the Community Strategic Plan.

Bicycle Parking

The supplied Transport Impact Assessment notes that the applicant is content with accepting conditions of consent requiring provision of bicycle parking spaces at the same per dwelling rates as previously approved. However, the proposed bicycle parking does not actually meet the DCP requirement of 1 space per dwelling, providing only 0.9 spaces per market dwelling.

Relocation of Substation onto the Amphitheatre Green Space & Deep Soil Zone

The modification relocates an electricity distribution substation from the northwest corner of the site into the green space below the amphitheatre seating. The modification report addresses this as a benefit for the design and safety of the cross site link. However, the new location of the substation is problematic for the future use and presentation of the amphitheatre space. If the substation is a typical Ausgrid kiosk substation, it will alienate a portion of the area from public use and be visually intrusive.

The landscape plans refer to the architectural plans, which themselves do not contain sufficient detail to understand how the substation will be accommodated. It is unclear as to whether the areas around the substation are proposed to accommodate a screening fence, a set of walls, or a vegetated buffer. This detail should be provided so that the impact on the space can be assessed.



Figure 4: Substation Location in Landscape Plan (Outlined in yellow)

Source: Landscape General Arrangement Plan Lower Ground Level, GroupGSA.

[Ausgrid Network Standard NS141](#) specifies the requirements for siting Kiosk substations, noting at 6.2.6 that *Trees, shrubs or plants other than lawn grass shall not be permitted on the substation site*. The land dimensions required depend on the type of substation being installed (Annexure A to NS141), but could be 2.05m deep, by 5.3m wide for one of the most compact configurations. Council requires clarification as to whether the proposed tree planting and landscaping will still be possible given the location of the substation.

Furthermore, given the presence of underground cables in the vicinity of the substation and the ambiguity around walls or other screening structures, it is unclear how much of the land around the substation can meet the ADG definition of deep soil.

The new substation location does not appear to be reflected in the Deep Soil Diagram (Drawing DA 4300) or in calculations of the amount of deep soil area provided in the modification report. An excerpt is provided below:

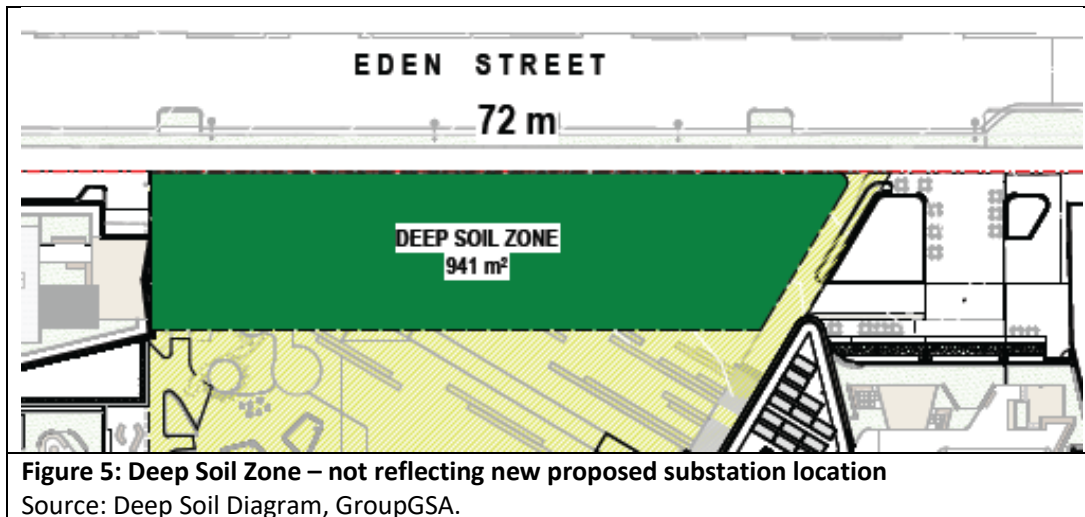


Figure 5: Deep Soil Zone – not reflecting new proposed substation location
Source: Deep Soil Diagram, GroupGSA.

In addition to the details for siting of the substation, the proposal should provide an updated Deep Soil Diagram and deep soil area calculation to demonstrate whether compliance is achieved.

We trust that DPHI will carefully consider this feedback for the proposed Modification Application.

If you require any further information, please do not hesitate to contact Robert McKinlay, Senior Urban Planner on (02) 9366 3724 or via email at Robert.Mckinlay@bayside.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Smith', written in a cursive style.

David Smith
Manager Strategic Planning