



ATTACHMENT 1 – Council Submission

SSD-76555711 - 3-5 Help Street, Chatswood

1. Background of project and development consent conditions

The site was subject to development application (DA-2023/160), which sought approval for the demolition of the existing site structures and the construction of a mixed-use shop top housing development. The development application was approved by the Sydney North Planning Panel (SNPP) on 20 December 2024.

This SSDA seeks to obtain incentives provided by the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP), which enable the maximum permissible floor space ratio and building height under Willoughby Local Environmental Plan (WLEP 2012) to be increased by 30%, if the affordable housing component is at least 15% of the gross floor area (GFA) of the development.

As this SSDA primarily seeks an increase in building height and floor space ratio while largely retaining the original design of the previously approved development application, the consent conditions issued by Council remain critical in ensuring that the development is constructed in accordance with best safety practices and the intended design quality outcomes are maintained. **Attachment 2** contains Council's recommended consent conditions.

2. Height in close proximity to CBD boundary

Council retains a number of reservations with respect to the infill affordable housing incentives inserted into the Housing SEPP in December 2023 and their applicability to the Chatswood CBD, noting the significant housing provided in the *Chatswood CBD Planning and Urban Design Strategy 2036* (the CBD Strategy) which became part of WLEP 2012 Amendment 34 (30 June 2023). The incentives enable the maximum permissible floor space ratio and building height under *Willoughby Local Environmental Plan* (WLEP 2012) to be increased by 30% if the affordable housing component is at least 15% of the gross floor area (GFA) of the development.

The *In-fill Affordable Housing Practice Note*, December 2023, states (p.13):

Responding to local standards

The full extent of the in-fill affordable housing bonuses may not be achieved on all sites, due to site constraints and local impacts. The in-fill affordable housing bonuses should not be treated as an entitlement. DAs that propose in-fill affordable housing will be subject to merit assessment by the consent authority. The application of the bonuses does not affect a consent authority's responsibility to consider the requirements of relevant EPIs, a development's likely impacts or the suitability of the site for the development. In applying the in-fill affordable housing

bonuses, applicants and consent authorities should be flexible in the design response of the development having regard to:

- the Government's policy intent to deliver more affordable housing through the in-fill affordable housing provisions of the Housing SEPP, and*
- the impact of the development on the amenity of the site and adjoining land, taking into account the building's height, scale and bulk.*

The in-fill affordable housing bonuses do not override any provision in any LEP or other EPI. However, local development standards should be applied flexibly and need to be balanced against the need to realise more affordable housing.

The *In-fill Affordable Housing Practice Note* confirms that in-fill affordable housing bonuses do not override height controls set by the relevant Local Environmental Plan (LEP). Council considers it critical that any proposal on this site appropriately responds to its context—situated on the boundary of the Chatswood CBD and directly opposite the low-density residential North Chatswood Conservation Area. The scale, height, and bulk of the proposed development—exacerbated by the application of affordable housing incentives—are considered to result in an unacceptable impact on the amenity of neighbouring properties, including those across Anderson Street and within the conservation area.

In the preparation of the draft CBD Strategy, a maximum height of 90m was proposed in this location.

In its review of the draft CBD Strategy in 2019, DPHI raised concerns with such a height on the CBD boundary, with particular regard to low density residential conservation areas (with a maximum height of 8m). DPHI required Council to undertake a review of heights along the CBD boundary. The subject site is opposite the North Chatswood Conservation Area, which contains items of local heritage significance at 20 Tulip Street and 21 Daisy Street. Refer to Figure 1 below which shows the subject site in context with the conservation area and surrounding heritage items.

Figure 1: WLEP 2012 Heritage Map



----- Subject site shown in red outline

An independent review was undertaken (by GMU) concluding that reduced heights were appropriate along the CBD boundary opposite low density residential conservation areas. Based on this review, DPHI subsequently endorsed the CBD Strategy in 2020. The subject site was granted an increase in height limit from 12m to 90m, which has provided a significant additional contribution to housing.

Having regard to the circumstances of this site and its location on the CBD boundary, Council is supportive of a shop top housing development consistent with WLEP 2012 controls. Whilst Council acknowledges that some increase over the WLEP height of 90m may be accommodated with minimal additional impact, Council requests consideration be given to some reduction in the proposed height to reduce the visual impact when viewed from Chatswood Concourse (when facing north-west) and Chatswood Oval (when facing north).

Figure 2: Extract from Visual Impact Assessment (Appendix P) – when viewed from Chatswood Concourse facing north-west

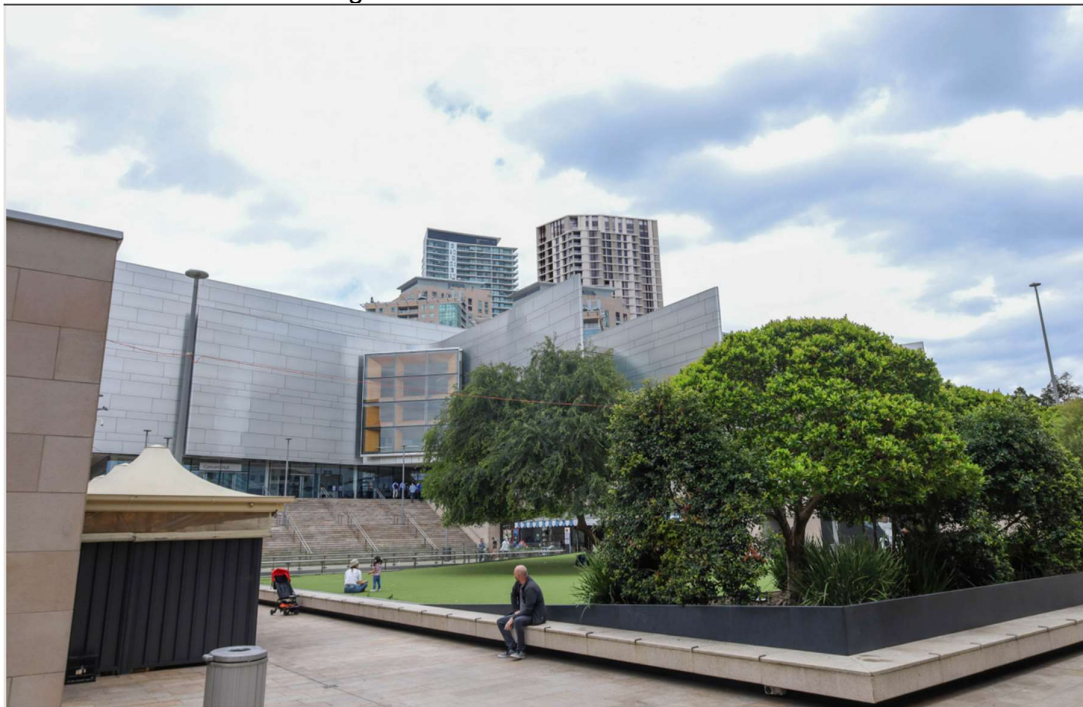


Figure 3: Extract from Visual Impact Assessment (Appendix P) – viewed from Beauchamp Park facing south-west



As seen from Figure 2 and 3 above, a minor reduction in the proposed height would still allow a significant amount of housing to be delivered, while improving modulation in the presentation of the CBD, particularly when viewed from Chatswood Concourse and Beauchamp Park. This is an important consideration as there will be future development at similar heights, and providing this modulation is necessary to improve the visual impact.

It is considered important to further state that a reduction in height by removing positive ground level public domain embellishment outcomes or reducing tower setbacks is not an acceptable approach, as these are expected in new development responding to WLEP 2012, WDCP and the CBD Strategy.

Having regard to the *In-fill Affordable Housing Practice Note*, it is noted that in-fill affordable housing bonuses do not override any LEP height control. Council seeks for the proposal on this site to have appropriate regard to the location on the boundary of the Chatswood CBD, opposite the low density residential North Chatswood Conservation Area. A reduction in the proposed height will have substantial improvements by reducing impacts to adjoining land and the conservation area, whilst improving modulation with adjacent towers when viewed from the surrounding locality. Particular regard is drawn to the expectations of the CBD Strategy and WDCP.

A nuanced approach to the Housing SEPP 30% bonus uplift is sought, with the proposed additional height in this location considered inappropriate based on bulk and scale impacts on the CBD boundary to the adjacent low density residential conservation area, and undermines recent strategic planning and community faith in the NSW planning system. The heights in this location have recently been substantially increased and indeed maximised. Whilst Council does not refuse any increase over the WLEP height of 90m, Council requests the proposal to be reduced in height to mitigate impacts to adjoining development and the conservation area to the north-east, whilst providing improved modulation when viewed from the surrounding locality.

3. Affordable housing contribution

The site is identified on the Affordable Housing Map under WLEP 2012 as being subject to a 4% affordable housing provision requirement. The EIS states the monetary value of 4% of the residential gross floor area will be provided to Council as a monetary contribution. Council's requests an affordable housing consent condition as part of any consent (provided in **Attachment 2**) to ensure the transparent provision of monetary contributions for affordable housing and to ensure the methodology for calculating the contribution is clear. In the absence of a clear condition there is a risk that disputes surrounding the methodology for calculation of the affordable housing will unnecessarily delay delivery.

Council supports the provision of 4% of the total residential gross floor area to be as a monetary contribution to Council. Council's requests an affordable housing consent condition as part of any consent to ensure the transparent provision of monetary contributions for affordable housing.

4. Infrastructure contributions

Council anticipates the full payment of applicable s7.11 or s7.12 local contributions and requests the opportunity to confirm the requirements under *Willoughby Local Contributions Plan 2019* prior to the finalisation of any relevant conditions, should the application proceed to the drafting of a consent.

The methodology to calculate the contribution rates and any relevant credits can be found in the *Willoughby Local Contributions Plan 2019*. Exemptions for affordable housing apply only to dwellings dedicated in perpetuity in accordance with the WLEP and there is no exemption for housing managed as affordable housing temporarily. Infrastructure contribution conditions are provided in **Attachment 2**.

Council anticipates the full payment of applicable s7.11 or s7.12 local contributions and requests the opportunity to confirm the requirements, including the specific value of contributions to be paid under *Willoughby Local Contributions Plan 2019* prior to the finalisation of any relevant conditions, should the application proceed to the drafting of a consent. The specific value of the contributions should be included in the condition of consent.

5. Excessive car parking spaces

The current proposed number of car spaces within this SSDA is shown in the table below:

Table 1: Proposed car spaces in SSDA (WDCP Controls)

	Proposal Details	Minimum car parking spaces (WDCP)	Maximum car parking spaces (WDCP)	Proposed parking spaces	Complies?
Residential dwelling mix	<ul style="list-style-type: none"> • One bedroom: 55 • Two bedroom : 89 • Three bedrooms: 16 • Total: 160 units 	<ul style="list-style-type: none"> • 0.1 spaces per studio/ 1-bedroom flat • 0.2 spaces per studio/ 2-bedroom flat • 0.25 spaces per studio/ 3+ bedroom flat 	0.5 x 160 = 80	141 private spaces 15 affordable housing spaces	No
Visitor spaces	2 visitor spaces	N/A	1 per 7 dwellings Max 22 spaces	2	Yes
Commercial floor space	2470m2 commercial/retail	N/A	<ul style="list-style-type: none"> • Commercial: 1 space per 400m2 GFA • Retail: 1 space per 70m2 GFA 	9	Yes

The proposed number of residential car spaces greatly exceeds the maximum allowance provided in the WDCP.

In considering this SSDA, emphasis is placed on the applicable planning document providing the lowest rate for car parking in the Chatswood CBD railway precinct (which would be the WDCP). Strategic planning and traffic modelling for the Chatswood CBD relies on the enforcement of low parking rates to ensure model shift and to maximise state government investment in the Chatswood Metro and other public transport infrastructure.

The CBD Strategy provides the following objectives regarding transportation:

Council has recently approved an Integrated Transport Strategy to:

- *Encourage public transport use*
- *Promote walking and cycling*
- *Manage growth in parking*

- *Develop parking directional signage*
- *Discourage private vehicle use*

Additionally, to understand Council's approach to car parking rates, Part F of the WDCP explains:

Willoughby City Council is committed to promoting Travel Demand Management by encouraging the use of active and public transport and minimising the adverse effects of car use in a way that sustains and enhances the economic and environmental qualities of the local government area.

Increasing the supply of car parking tends to encourage a greater number of vehicle trips. This increases congestion and impacts negatively on the city environment. We carefully consider when off-street car parking is allocated for developments and the amount of car parking allocated.

It is acknowledged that the Housing SEPP is an EPI, however Council's WDCP parking rates are the more appropriate control in this instance given:

- The location of this site in a CBD where density has been significantly increased
- Public transport options have increased
- Encouraging pedestrian and active transport was an important part of Council and TfNSW support for significant uplift
- Enhancing residential and worker amenity was an important part of Council support for significant uplift
- The State Government has permitted more pathways increasing density via the Housing SEPP

The proposed number of residential car spaces is 156. This significantly exceeds the maximum rate of 80 residential car spaces in accordance with Council's WDCP. It is understood the Housing SEPP requires a minimum of 131 residential car parking space be provided, however Council requests a reduction in residential car parking spaces in line with the maximum rates indicated in Table 1.

The WDCP rates were set following consultation with TfNSW and strategic modelling of the growth in Chatswood CBD, noting the constraint of increasing congestion on the Pacific Highway and the ongoing regional importance of the Pacific Highway. The WDCP rates seeks to decrease reliance on cars, minimise traffic congestion, encourage and increase active transport options and maximise amenity at street level for workers and residents in order to ensure impacts on regional capacity remain acceptable. Approving applications the CBD with parking provision well above the WDCP rates will likely cause significant congestion on the Pacific Highway as well as in the local traffic network.

The proposed number of residential car spaces is 56. This significantly exceeds the maximum rate of 58 residential car spaces in accordance with Council's WDCP. The SSDA is requested to be amended to have car parking consistent with WDCP car parking rates.

Council seeks an approach to car parking in the Chatswood CBD that aligns with the significant and successful investment in the Metro, rather than default provisions that apply more broadly across NSW or outside metropolitan transport precincts. In considering this SSDA, Council requests that emphasis be placed on the planning document that prescribes the lowest applicable car parking rate within the Chatswood CBD railway precinct—namely, the *Willoughby Development Control Plan* (WDCP), Part F: Transport and Parking Management. Strategic planning and traffic modelling for the

Chatswood CBD are based on the enforcement of low parking rates to encourage a shift away from car use and to support the substantial public investment in the Chatswood Metro and other transport infrastructure.

6. Cambridge Lane and the public right of way

The previously approved development application proposed to enhance Cambridge Lane as a shared zone to take into consideration the uplift in residents from the proposal and surrounding development, resulting in an increase in vehicle and pedestrian movements through Cambridge Lane.

The previous consent for the approved development application (DA-2023/160) contained conditions regarding upgrades to Cambridge Lane and to establish the western pathway as a public right of way. These conditions of consent are still relevant and necessary to ensure improvements to Cambridge Lane are completed to meet the increase in vehicle and pedestrian movements, and to ensure the public right of way is provided and utilised appropriately.

The conditions are provided below:

Before Issue of a Construction Certificate:

Cambridge Lane - Shared Zone

The Cambridge Lane frontage of the development is to be transformed into a comprehensive 10km/h shared zone, incorporating a dedicated shared pedestrian and bicycle path. The design can be integrated with urban design elements to:

- Extend from the building setback line to connect with the existing cycle path along McIntosh St
- Enhance the 10km/h zone with road markings indicating the shared nature of the space
- Include a dedicated shared path within the zone, designed to appropriate width and safety standards for mixed pedestrian and bicycle use
- Ensure clear delineation between the shared path and the vehicular area while maintaining a cohesive shared zone feel
- Prioritize pedestrian and cyclist safety while allowing limited vehicular access
- Feature adequate lighting, signage, and surface treatments to enhance safety and usability for all users
- Create smooth transitions at connection points with existing infrastructure and at entry/exit points of the shared zone.
- Utilise distinct pavement materials for the road surface to enhance the unique character of the shared zone and serve as an additional traffic calming measure.

Before Issue of an Occupation Certificate

Right of Way Registration

Prior to the issue of any Occupation Certificate, a right-of-way must be registered with Land Registry Services over all that part of the land that is located between the glassline of the building at ground floor level and the boundary, along Cambridge Lane, Help Street and McIntosh Street. The right-of-way is to allow public use of this portion of the land.

(Reason: Compliance, urban design)

The previously approved development application (DA-2023/160) included conditions to upgrade Cambridge Lane as a shared zone and to establish a public right of way along the western pathway, in response to the anticipated increase in vehicle and pedestrian movements resulting from the proposed and surrounding developments. These conditions remain relevant and necessary to ensure that Cambridge Lane is appropriately improved to support increased usage and that the public right of way is delivered and maintained.

7. Waste management

In the latest Willoughby DCP (2023, Part B Section 4.3.8), Willoughby City Council has formally adopted the Waste Management Technical Guide and Development Controls by North Sydney Regional Organisation of Councils (NSROC) for multi-dwelling housing, residential flat buildings and mixed-use developments.

- The NSROC technical guide (NSROC 2018) provides comprehensive information to achieve best practice design and construction of waste management and recycling systems.
- The NSROC development controls (NSROC 2018a) provide specific requirements for internal waste storage facilities, individual bin storage areas, communal bin storage areas, bin carting routes, and access for collection vehicles.
- All major residential developments must comply with the technical guide and the specific controls for multi dwelling housing, residential flat buildings, and mixed-use buildings.

The development proposed corresponds to the high-rise definition in NSROC 2018 (NSROC, 2018, Section 1.2) and it is a mixed-use development. The proposal should conform to NSROC (2018) particularly including:

- Section 3 – Requirements that apply to all developments; and
- Section 5.3 – Residential flat buildings: high-rise; and
- Section 6 – Mixed-use development.

The conditions from the approved DA (2023/160) were based on 127 residential units and up to L25. The SSDA has 33 additional residential units over 8 additional storeys. The conditions of the approved DA still generally apply except for a need to upscale requirements in Condition 28 (Waste Storage Areas) and Condition 53 (Waste Management).

Items to resolve

There are some areas where the SSDA does not appear to satisfy these minimum requirements as outlined below.

Collection of residential waste: bins and bulky waste

Council services residential waste, including bins and bulky waste using HRV trucks. The approved DA (2023/160), has conditions requiring swept paths to demonstrate that Council's 10.5m long HRV will fit into the site and requiring a 12.5m parking space (10.5m truck and 2m rear clearance). The same requirements and conditions need to apply to the SSDA.

While swept paths were supplied (PDC Consultant, Transport Impact Assessment, Lower GF 1 Plan Rev 02, 17.02.2025), onsite collection with a Heavy Rigid Vehicle (HRV) was not clearly stated contrary to the Willoughby DCP 2023 Vehicular Access Requirements (NSROC 2018, p34, Table 11).

- There are two loading bays shown, an SRV bay and an MRV bay and no bays labelled HRV.
- There are discrepancies between plans in the length of the truck:
 - Public domain plan (EMBECE, Issue - 20.12.2024) shows an 8.8m truck.
 - LG plan (EMBECE, Issue C, 08.05.2025) shows a 10.5m truck.
- The MRV bay does not show a labelled 2m rear clearance.
- All bin rooms are not located with 2m of the truck parking space and the access to the residential waste holding room is limited due to the SRV bay location if the Council HRV stopped in the existing MRV bay.

In addition, it is not clearly shown how bins and bulky waste will be wheeled or carried around the truck with a 2m clearance for walkway (NSROC 2018, Section 3.16.2 Bin Carting Routes for caretakers and waste Collection Providers).

The loading area needs to be designed so that Council's HRV (10.5m long) has a 12.5m long parking space within 2m of each residential collection holding room (bins and bulky waste).

Residential organics bin capacity

Based on the number and size of units, there is a shortfall of at least 400L per week of organics bin capacity. The service is termed "food organics" in the OWMP, but is actually an organics service (currently garden organics (GO)), but is Council is mandated by the State Government to provide Food Organics (FO) collection by 2030, either as separate FO or combined FOGO).

The OWMP (2025, Rev M, Table 3) provides for only 4,000L of organics capacity per week based on 25L/unit/week. Council requires 120L/unit/week for GO (in the Willoughby DCP 2023 through NSROC 2018, p19) or will consider the NSW EPA (2019) Better Practice Guide for Resource Recovery in Residential Developments (Table F2) for FOGO. This requires 4,400L per week based on a calculation using:

- Studio, 1-bed or 2-bed unit: 25L/unit/week. [144 proposed in the architectural plans "Housing SEPP Compliance Plans").
- 3+ bed unit: 50L/unit/week. [16 proposed in the architectural plans "Housing SEPP Compliance Plans")

Non-residential waste generation rates

There appears to be a shortfall in the required non-residential bin capacity in the OWMP (2025, Rev M, Table 4: Estimated Waste and Recycling Volumes – Retail) due to potential differences in the site area and benchmarks for the use type. The LG/UG non-residential waste generation is calculated using retail generation rates in the OWMP (2025, Rev M, Table 4), but is specified as a café. Cafes have benchmark higher generation rates than retail.

Use	Area (m ²) ^	Bin type	Required		Proposed	
			Benchmark (L/100m ² /day)	Volume (L/week)	Area (m2)	Volume (L/week)
Office (L1&Mezz)	1,982.6	General waste	10	1,388.1	1,960	980
		Recycling	10	1,388.1		1,470
Retail (café) (LG&UG) #	362.8	General waste	660	16,761.5	352	2,464
		Recycling	120	3,047.8		2,956.8
Total commercial	2,345.4	General waste	10	18,149.6	2,312	3,444
		Recycling	10	4,435.9		4,426.8

^ Based on architectural drawings (2025, Issue A, GFA Plans).

Referred to Café (OWMP, 2025, Rev M, Table 4: Estimated Waste and Recycling Volumes – Commercial and Retail Tenancies).

Note: Non-residential organics bins would also be considered favourably.

The change in volume (L/week) might require a larger non-residential waste storage area and/or more frequent collection. A possible solution is below within the non-residential waste storage area size provided using more frequent collection.

Bin type	Bin size	Required			Proposed		
		Number of bins	Area (m ²)	Collection frequency option	Number of bins	Area (m ²)	Collection frequency
General waste	1,100L	4	8.2	Five times per week	2		Twice weekly
Recycling	1,100L	1 ^	2.0	Five times per week	3		Twice weekly
Total	-	5	10.2	-	5	>17	-

Note: This could be amended to 3 general waste bins and 2 recycling bins as well as some additional organics capacity, in order to seek to provide a better resource recovery rate.

Charity waste / other recycling area

The OWMP (2025, Rev M) does not clearly demonstrate charity and other recycling storage space (6m²), which is required in the Willoughby DCP (NSROC, 2018, Section 3.12.1).

Internal residential waste

The proposal is not clear that there is a provision for space allocated inside each residential unit for source-separation with capacity for two days waste generation (NSROC 2018, Section 3.8).

Waste storage area sizes

The waste storage area sizes should be shown on the architectural plans aligning with the OWMP.

Waste storage conditions and amenities

The proposal is not clear that all of the required conditions and amenities for communal bin storage areas (e.g. NSROC 2018, Section 3.10.3, Table 8) have been met, including location, drainage, taps and aisle width, access, door widths of a minimum of 2.5m (2,500mm) wide. These should be shown on the architectural plans. For example, the OWMP (2025, Rev M, Section 5.6) states a 1.5m door for the bulky waste room which is not compliant with Council's requirements.

However, there are key design requirements that appear to be met:

- Residential bin and bulky waste collection frequency collected by Council:
 - General waste: twice per week
 - Recycling: once per week
 - Organics: once per week
 - Bulky waste: booked service.
- Residential bin storage area sizes (amend Condition 28):
 - All residential bins: $\geq 88\text{m}^2$ plus non-bin waste equipment space)
 - Residential bulky waste: $\geq 34\text{m}^2$
- Non-residential waste collection by a private contractor. However, organics bins would be considered favourably.
- Chutes and on-floor residential bins on each residential level.
- Construction and demolition waste management plan.
- Collection truck for collection of non-residential waste: private collection of bins using SRV/MRV (or HRV, if demonstrated).

The SSDA does not appear to fully comply with Council's waste management requirements. Key issues include the lack of clear provision for residential waste collection using Council's 10.5m HRV and the required 12.5m parking bay with appropriate access to all bin rooms. Discrepancies exist in truck sizes and loading bay labelling, and bin carting routes are not adequately demonstrated. There is a shortfall of at least 400L/week in residential organics capacity based on DCP and EPA standards, and the OWMP underestimates non-residential waste, particularly for café uses, possibly requiring larger storage areas or more frequent collection. Additional concerns include the absence of designated charity/recycling storage, unclear internal unit space for waste separation, and missing details in architectural plans regarding waste storage area sizes and required amenities, such as compliant doors and drainage. These matters must be addressed to meet the Willoughby DCP 2023 and NSROC 2018 waste guidelines.

8. Building sustainability

Council recently exhibited amendments to the WDCP from 17 March to 22 May 2025. These proposed amendments provide clarity on Council expectations regarding sustainability standards for new development across the Chatswood CBD. These amendments to the WDCP were finalised on 9 July 2025.

The amendments require development in the MU1 Mixed Use Zone to achieve a minimum 5 star GBCA building rating.

Council seeks a clear commitment consistent with the exhibited WDCP amendment (soon to be finalised) for a minimum 5 star GBCA rating or the equivalent for the proposed SSDA

development. Council seeks for any approval to contain conditions of consent requiring a 5 star GBCA rating or equivalent.

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9. Engineering issues

Stormwater management

The stormwater management system includes an OSD system, as required by Part I of the DCP and Technical Standard 1. However, the system proposed does not reduce peak flows to meet Council's permitted site discharge (PSD) requirements. The proposed system limits peak flows from the site in the 1%AEP storm to 65L/s and not the 39L/s required to comply with Council's requirements.

The documentation has provided the analysis of the 1%AEP water level immediately downstream of the OSD tank. The analysis has detailed that the 1%AEP water level at the OSD tank is RL 91.46m, while the base level of the OSD tank is RL 91.38m. Council requires that the base level of the tank is above the 1%AEP water level, so that the downstream water level does not impact the operation of the OSD system and that the required PSD can be achieved. To achieve this requirement, the base of the tank needs to be raised to RL 91.45m.

Details have not been provided to confirm that floor levels in the building immediately adjacent to the tank are a minimum of 300mm above the overflow grates in the top of the tank. However, we believe that this is achieved.

Stormwater quality improvement measures are proposed and details have been provided to confirm that the measures comply with the requirements of Part I of the DCP and Technical Standard 1.

Overland Flow

A Flood Risk Assessment Report has been provided for the site, which details flood levels around the site and compliance of the development with minimum floor level requirements. The report details that the proposed development meets all Flood Planning Level requirements, except for the main vehicle access ramp to the basement. Council's Technical Standard 2 (an Appendix of Part I of the DCP) requires that basement access adjacent to a flow path is to be at a minimum level of the 1%AEP flood level + 500mm or the PMF, whichever is higher. From the Flood Risk Assessment Report, at the location of the proposed vehicle access, the 1%AEP flood level is 91.40m and the PMF level is 93.54m. The report details that in this location it is not possible for the vehicle access ramp to be at the PMF level, due to the height above the roadway, and that the ramp level is set at 94.91m, which is above the 1%AEP +500mm level. Council has no objection to this, which is in line with the level approved as part of the DA.

Vehicle access and parking

The vehicle access and parking arrangements are generally acceptable to Council and have demonstrated compliance with the relevant standards. Access of the loading bay by

Council's waste vehicle is a concern. The loading dock is accessed off the main vehicle access point to the site, with the waste vehicle needed to reverse into the bay. The swept path diagram provided details that this manoeuvre is very tight, and at the roller shutter potentially infringes on the nib for the door and within the loading dock just skims the wall. As vehicles undertaking this maneuverer are likely to be under pressure from other vehicles entering or leaving the site and to allow for variations in driver ability, there should be additional clearance around the swept path, so that the manoeuvre is not as tight and the turn can be made with ease.

The swept path diagrams have not clearly demonstrated that a passenger vehicle can pass the service vehicle at all locations between the entry road and the loading bay. The service vehicle should be Council's waste vehicle, and as a minimum should be a Medium Rigid Vehicle (MRV), which would be required for furniture deliveries and removals. If it is not able to be demonstrated that a passenger vehicle can pass a waste vehicle, then details need to be provided to demonstrate how the potential conflict can be managed. It must be demonstrated that vehicles do not need to reverse over the boundary in the event of a conflict.

The proposed stormwater management system includes an on-site detention (OSD) system in accordance with Council's DCP and Technical Standard 1; however, it does not meet the required Permitted Site Discharge (PSD) rate, with peak flows in the 1%AEP storm exceeding the allowable 39L/s at 65L/s. Additionally, the OSD tank base level is below the downstream 1%AEP water level, and must be raised to RL 91.45m to comply. While stormwater quality measures meet Council standards, confirmation is needed that adjacent floor levels are at least 300mm above overflow grates. In terms of overland flow, the Flood Risk Assessment confirms compliance with Flood Planning Levels, including the basement ramp, which—though not meeting the PMF—exceeds the required 1%AEP +500mm. Council raises concern with the waste vehicle's tight manoeuvring into the loading dock, recommending increased clearance to ensure safe and practical access.