

6 May 2022

218757

Anthony Witherdin
Director – Key Sites Assessments
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

ATTN: David Glasgow, Principal Planning Officer, Key Sites Assessments

Dear David,

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
SSD-11429726 – EDEN STREET COMMUNITIES PLUS**

This letter has been prepared by Ethos Urban on behalf of Arncliffe Eden Property Pty Ltd in response to the Request for Additional Information (RFI) issued by the Department of Planning and Environment (DPE) for SSD-11429726 dated 27 April 2022, as well as additional requests for clarification received by email. This letter should be read with reference to the following appended documentation:

- Amended Clause 4.6 Variation Request – Floor Space Ratio prepared by Ethos Urban (**Attachment A**);
- Amended Architectural Plans prepared by Group GSA (**Attachment B**);
- Amended Landscape Plans prepared by Group GSA (**Attachment C**); and
- Amended Future Context Diagrams prepared by Group GSA (**Attachment D**).

A detailed response to each item raised by DPE is provided below.

Yours sincerely,



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Jim Murray
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Response to RFI

Item	Proponent's response
Response to RFI – 27 April 2022	
<p>I refer to assessment of the Eden Street, Arncliffe Mixed Use Redevelopment (SSD-11429726). We require additional information as outlined below.</p> <ul style="list-style-type: none"> An updated 4.6 variation request accurately reflecting the proposed GFA. 	<p>An amended Clause 4.6 Variation Request for Floor Space Ratio has been prepared by Ethos Urban at Attachment A.</p>
<ul style="list-style-type: none"> Clarification and further justification for the proposed 850mm boundary setback to the neighbouring properties at 52 Eden Street, 7 Forest Road and 181 Princes Highway. I note that the wall adjacent to this boundary is not a party wall and the justification that it ensures no constructability or structural concerns for future development is unclear. Consideration should also be given to how the wall itself and the area between the building and the boundary would be treated, accessed and maintained. 	<p>The boundary setback to 52 Eden Street, 7 Forest Road and 181 Princes Highway has been amended to a 0m setback which is consistent with Part 5.3(6) Mixed Use of the Rockdale DCP 2011, which states that:</p> <p><i>“Generally, the lower levels of buildings are to be built to side and rear boundaries or be set back no less than 3m.”</i></p> <p>Updated Architectural and Landscape Plans which illustrate the 0m boundary setback have been provided at Attachment B and Attachment C.</p>
<ul style="list-style-type: none"> Confirmation on the plans sought for approval including a full consolidated set of architectural, landscape and any other plans reflecting the proposal as amended by the RtS and Responses to the Department's RFIs. 	<p>As requested, updated Architectural and Landscape documentation has been provided by Group GSA as a complete set. The documentation provides the consent authority with a complete package on what is sought by the proposal following post-lodgement design amendments and supersedes all previously submitted architectural documentation. Refer:</p> <ul style="list-style-type: none"> Amended Architectural Plans at Attachment B, including: <ul style="list-style-type: none"> Updated building floor plans and elevations showing the proposed 0m boundary setback; Updated context analysis of 52 Eden Street (Drawing DA-4584) incorporating the proposed 0m boundary setback; and Updated overshadowing plans, including detailed overshadowing analysis and sun eye views of 7 Forest Road and 52 Eden Street. Amended Landscape Plans at Attachment C.

Item	Proponent's response
Response to e-mail correspondence – 2 May 2022	
<p>I note that you will be updating the shadow diagrams to show impacts of the proposed zero setback, and that you will also be updating the whole of precinct development study (pg 15 of the RTS design statement) to demonstrate that the proposed setbacks are compatible with and would not adversely impact on the potential future development of neighbouring properties.</p>	<p>As above, updated shadow diagrams to 7 Forest Road and 52 Eden Street (Drawings DA-4585 – 4595) have been provided at Attachment B. They demonstrate that:</p> <p>For 7 Forest Road:</p> <ul style="list-style-type: none"> Existing solar access is maintained between 9am to 3pm on 22 December. Existing solar access is maintained to the northern façade until 12pm and after 1:15pm, and the eastern façade until 12:30pm and after 1:30pm on 21 March. Existing solar access is maintained to the northern façade from 1:45pm, and the eastern façade from 11am to 11:30am on 21 June. <p>In summary, the proposal will maintain good solar access to the derelict and unoccupied property at 7 Forest Road on 22 December and 21 March. The proposal will reduce solar access to 7 Forest Road in midwinter, however as demonstrated by the solar analysis undertaken for future development at 7 Forest Road and its adjoining lots, future development consistent with the Council's desired future character for the Arncliffe Town Centre can comply with solar access requirements of the ADG as shown on page 4.</p> <p>For 52 Eden Street:</p> <ul style="list-style-type: none"> Existing solar access is maintained to the windows on northern façade from 9:15am on 21 June and from 10.15am on 21 March which complies with the minimum 3 hour requirement under Section 4.4.2 of the Rockdale DCP 2011. Existing solar access is maintained to the windows on the western façade between 9.00am and 3pm on 21 June and 21 March which complies with the DCP requirement. There are three windows on the eastern façade. The proposal will maintain solar access to the window closest to Eden Street from 12pm onwards on 21 June which complies with the DCP requirement. The proposal will maintain solar access to the windows towards the rear of building from 2.30pm onwards on 21 June. On 21 March all three windows receive direct solar access from 12.30pm onwards. <p>In summary, the proposal will maintain a minimum of 3 hours solar access to the windows to habitable rooms at 52 Eden Street on 21 June and 21 March apart from two windows on the eastern façade.</p> <p>The whole of precinct development study has been updated (Attachment D) and incorporates the new 0m boundary setback. The study demonstrates that the future redevelopment of 52 Eden Street, 7 Forest Road and 181 Princes Highway can accommodate a uniform street wall podium which enables future development of the neighbouring sites to comply with Part 5.3(6) Mixed Use of the Rockdale DCP 2011.</p>

Item	Proponent's response
<p>We request that you also update the overshadowing analysis for the potential building envelopes and to clearly demonstrate that future development is capable of achieving the ADG recommendations for solar access.</p> <p>We note that the View from Sun at page 15 of the RTS design statement is too low-resolution to identify potential Buildings E1 and E2 and how they may meet the ADG recommended minimum solar access. Further and more detailed analysis of the updated development study should be provided to demonstrate that future development on neighbouring sites is capable of achieving a high level of solar access (and overall amenity) in line with the ADG.</p>	<p>The overshadowing analysis for the potential building envelopes has been updated, and is provided at Attachment D.</p> <p>The diagrams have been amended to show the revised 0m setback to the common boundary, with the conceptual Block E1 and Block E2 built forms amended, so that their podiums are built up to a party wall on the shared boundary.</p> <p>Block E2 continues to meet ADG requirements for solar access, as shown below:</p>



Hypothetical levels 1-6 floorplate



Hypothetical levels 7-8 floorplate