

1 June 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 23 May 2022. This letter should be read with reference to the following appended documentation:

- Traffic Statement prepared by Stanbury Traffic Planning (**Attachment A**);
- Amended Architectural Plans (including Height Blanket Diagrams) prepared by Group GSA (**Attachment B**);
- Updated Planting Schedule prepared by Group GSA (**Attachment C**); and
- Revised Flood Impact Assessment Report prepared by TTW (**Attachment D**).

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

Yours sincerely,



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Response to RFI

Item	Proponent's response
Princess Highway/Brodie Spark Drive intersection performance	
<p>1. The intersection performance tables contained within Appendix 6 of the revised Transport Impact Assessment show vehicle movements turning right from Princes Highway to Brodie Spark Drive are unchanged by the proposed development, despite an increase in trips being noted in the remainder of the report.</p> <p>Please have the traffic engineer review the tables to include accurate trip details and provide an updated detailed analysis of the specific impact on the Level of service (LoS) on the right turn from Princes Highway to Brodie Spark Drive, including existing and projected:</p> <ul style="list-style-type: none"> • vehicle trips • delays • saturation levels • overall LoS <p>The wider analysis of intersection performance should be updated as necessary to take account of any new /revised information</p>	<p>Refer to Traffic Statement by Stanbury Traffic Planning at Attachment A.</p>
Development on behalf of Land and Housing Corporation	
<p>2. The EIS states that the development is being carried out on behalf of Land and Housing Corporation (LAHC). Please provide information that addresses the following questions to substantiate this statement:</p> <ul style="list-style-type: none"> • Are the interests of the LAHC being accommodated? Or is the activity being carried out jointly? 	<p>LAHC has instigated the redevelopment of the site and LAHC is a significant beneficiary of the redevelopment of the site in terms of new social housing stock being created. The proposed development is made on behalf of LAHC.</p> <p>Under the 'Communities Plus' incentive, LAHC partners with private developers to redevelop key LAHC sites to include a mixture of social housing integrated with market housing. LAHC has engaged Arncliffe Eden Property Pty Ltd (Billbergia), who was successful in its tender for the site, to act for and on behalf of LAHC as its development partner. Further information is provided at Section 1.3 of the submitted EIS dated 19 July 2021.</p>
<ul style="list-style-type: none"> • Are there elements of control, supervision or direction by LAHC? 	<p>LAHC retains ownership of the land, and LAHC reviews and approves all project documentation prior to lodgement with DPE.</p>
<ul style="list-style-type: none"> • Who is paying for the activity? Who is supervising it? 	<p>Arncliffe Eden Property Pty Ltd (Billbergia) as the developer is paying to facilitate the development, as consistent with the objectives of the 'Communities Plus' scheme, under the supervision of LAHC.</p>

<ul style="list-style-type: none"> Is there an agreement between the two parties and what are its terms? 	<p>Yes, there is a project delivery agreement (PDA) in place between LAHC and Billbergia, which allocates risk, roles, and responsibilities between the parties. The PDA also enshrines LAHC's approval role, ensures the delivery of the project objectives, and sets out project milestones to ensure the social housing, as well as the project as a whole is delivered to program.</p>
<ul style="list-style-type: none"> Who owns the land? 	<p>The site is owned by LAHC, which is a 100% state owned corporation.</p>
<ul style="list-style-type: none"> Is LAHC an incidental beneficiary? 	<p>No, LAHC initiated the project and is a primary beneficiary of the project. The project is aligned with <i>Future Directions for Social Housing in NSW</i> as part of the 'Communities Plus' initiative, whereby the NSW Government partners with the private and community housing sectors to deliver more and better social housing at no cost to government.</p>

Flood levels

<p>3. The recommended finished floor levels and driveway RLs within the revised Flood Impact Assessment (FIA) do not appear consistent with the levels shown on the proposed plans. Please review the recommendations of the FIA and demonstrate how these have been incorporated into the proposal, including revised plans as necessary. Please also provide the AEP and PMF levels for the site so the adequacy of the recommended levels can be verified.</p>	<p>The Flood Impact Assessment Report has been updated by TTW at Attachment D to reflect design changes made to the proposal subsequent to the lodgement of the RTS.</p> <p>The site continues to be generally flood-free during both 1-in-100 year (1%AEP) and Probable Maximum Flood (PMF) events. The report confirms that all habitable floor levels continue to be 300mm above existing ground level and all openings to lower ground levels are to be 200mm above kerb level.</p>
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Amended plans

<p>4. Provide a height blanket diagram showing the proposed buildings measured against the 70m height plane across the site.</p>	<p>Height blanket diagrams have been provided at Drawing DA-4660 of Attachment B.</p>
<p>5. Provide amended elevation plans which:</p> <ul style="list-style-type: none"> clearly annotate the setback from the front face of the building (as it varies at different levels) to the side boundary at that location (ie. at the front face of the wall where elevation is taken from) remove the variable boundary lines for clarity remove the red height limit line for clarity, noting the height blanket diagram will be provided. 	<p>Updated elevation plans (Drawings DA-3005 – 3043) have been provided at Attachment B responding to the issues raised.</p>
<p>6. Update the car parking table on drawing DA 0000 to accurately reflect the car parking proposed on the lower ground (91 rather than 85) and basement level 1 (210 rather than 216).</p>	<p>Drawing DA-0000 in Attachment B has been updated with the correct car parking numbers.</p>
<p>7. Update the development summary table on drawing DA 0000 F to include wintergardens in the total GFA and FSR calculations.</p>	<p>Wintergardens have been included in GFA and FSR calculations.</p>
<p>8. Update the key on Drawing DA4101 to show 889m² of wintergarden instead of 848m².</p>	<p>Drawing DA4101 in Attachment B has been updated to show the correct wintergarden GFA.</p>

9. Update the key on Drawing DA4103 to show 482m² of wintergarden instead of 418m².

Drawing DA4103 in **Attachment B** has been updated to show the correct wintergarden GFA.

10. Provide an updated planting schedule confirming the number of replacement trees.

An updated planting schedule (Drawing DA-9300) is provided at **Attachment C**.

11. Provide an updated final consolidated set of architectural plans.

Attachment B has been issued as a complete architectural set.