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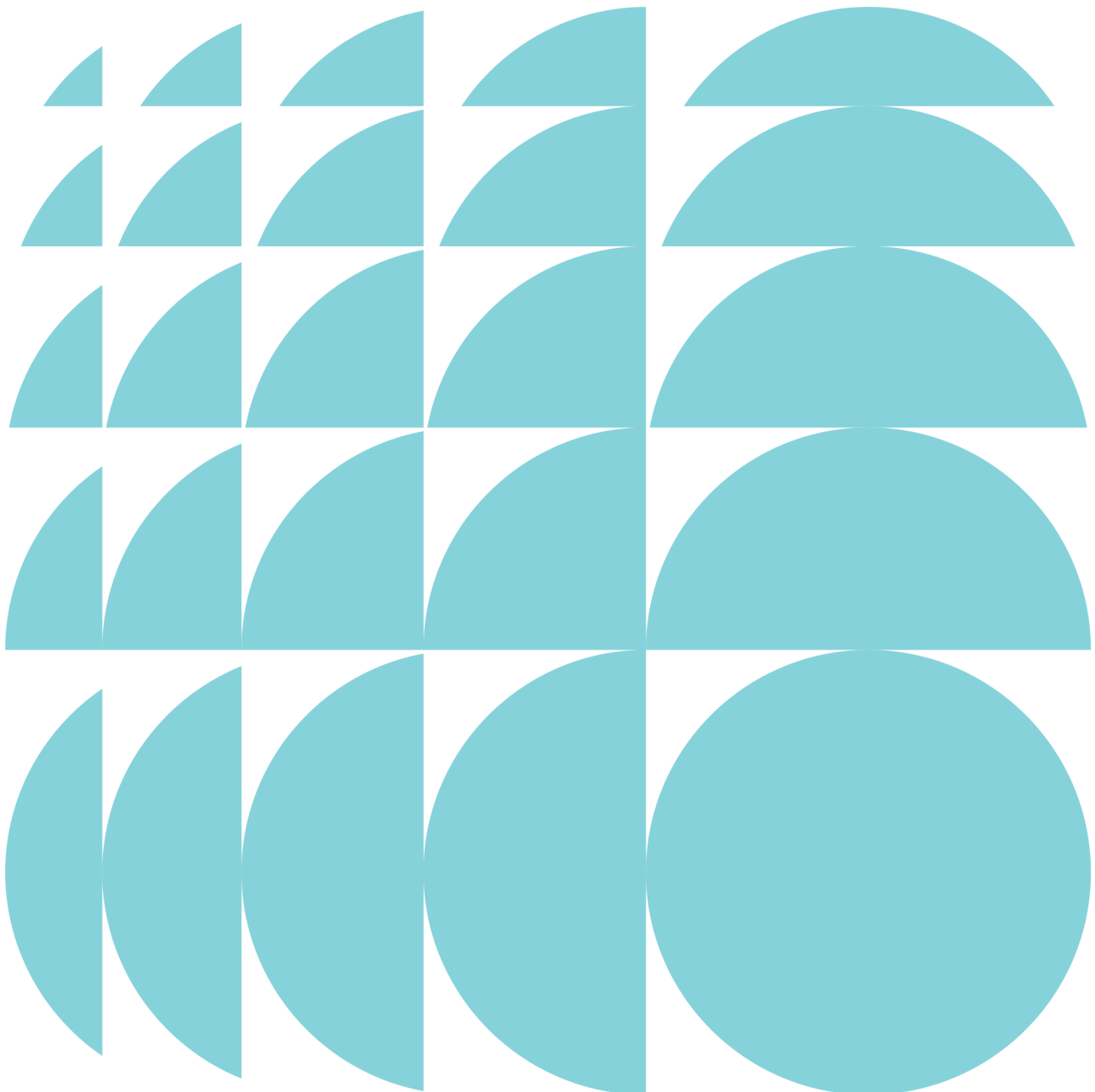
Environmental Impact Statement SSD-11429726

26-42 Eden Street and 161-179 Princes Highway,
Arncliffe
Eden Street Communities Plus

Submitted to Department of Planning, Industry
and Environment

On behalf of Arncliffe Eden Property Pty Ltd

19 July 2021 | 218757



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VERSION NO.	DATE OF ISSUE	REVISION BY	APPROVED BY
Preliminary Draft	31.05.2021	YL	JM
Draft	4.06.2021	YL	JM
Final	05.07.2021	YL	JM
Final – RFI Amendment	19.07.2021	YL	JM

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Statement of Validity

Development Application Details

Applicant name	Arncliffe Eden Property Pty Ltd
Applicant address	Suite 101/25 Angas Street, Meadowbank, NSW 2114
Land to be developed	26-42 Eden Street and 161-179 Princes Highway, Arncliffe
Proposed development	Demolition of existing buildings on site and the construction of a mixed-use residential and retail development with publicly accessible open space

Prepared by

Name	Jim Murray
Qualifications	Master of Urban and Regional Planning
Address	173 Sussex Street, Sydney
In respect of	State Significant Development – Development Application

Certification

I certify that I have prepared the content of this EIS and to the best of my knowledge:

- it is in accordance with Schedule 2 of the Environmental Planning and Assessment Regulation 2000;
- all available information that is relevant to the environmental assessment of the development to which the statement relates; and
- the information contained in the statement is neither false nor misleading.

Signature



Name	Jim Murray
Date	30 June 2021

Executive Summary

This Environmental Impact Statement (EIS) is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of a State Significant Development Application (SSDA) for the development of land at 26-42 Eden Street and 161-179 Princes Highway, Arncliffe (the site) into a mixed-use precinct with retail and residential uses, involving both market and social housing as part of the NSW Land and Housing Corporation (LAHC)'s 'Communities Plus' initiative.

This EIS has been prepared by Ethos Urban on behalf of Arncliffe Eden Property Pty Ltd and is based on the Architectural Plans (**Appendix A**) and Urban Design Report (**Appendix B**) prepared by Group GSA, and other supporting technical documentation appended to the report. It seeks approval for the following development:

- Demolition of all existing buildings and structures on the site;
- Site preparation works, excavation and tree removal;
- The construction of a mixed-use development comprising:
 - 744 apartments across (4) buildings between 19-23 storeys in height, as follows:
 - 186 market housing apartments in Building A;
 - 202 market housing apartments in Building B;
 - 180 social housing apartments in Building C; and
 - 176 market housing apartments in Building D;
 - 3,113m² retail gross floor area;
 - 240m² for a future childcare centre;
 - 3,706m² of communal open space;
 - 813 spaces of lower ground and basement car parking; and
- 4,870m² of publicly accessible open space including a 4,000m² park, an 870m² public plaza (meeting space), and through site link connecting Eden Street and the Princes Highway.

As the proposed development has a capital investment value above \$30 million and is being carried out on land owned by the NSW Land and Housing Corporation, it is State Significant Development (SSD) by virtue of Clause 10, Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

The proposed development is considered to exhibit planning merit. Having regard to environmental, economic, and social considerations, the carrying out of the development is justified for the following reasons:

- The proposal is permissible with consent and meets the statutory requirements of the relevant environmental planning instruments, including the relevant SEPPs and *Rockdale Local Environmental Plan 2011*.
- The proposal is consistent with and improves upon the Bayside Council's vision for the Eden Street LAHC site established within the Rockdale Development Control Plan 2011.
- The proposal will act as the catalyst for the regeneration of the Arncliffe Planned Precinct in a manner that is consistent with the relevant strategic planning documentation including the *Greater Sydney Region Plan*, *Eastern City District Plan* and *Bayside West Precincts 2036*.
- The proposal will deliver 180 new social housing dwellings on a key LAHC site, providing significant public benefits by housing people who are unable to access accommodation on the private market, in a location that is adjacent to high frequency public transport and town centre amenities.
- The development will enhance the amenity, vibrancy, and availability publicly accessible open space within Arncliffe, including the delivery of a new retail precinct and 4,000m² Eden Street Park which will be owned and maintained at no cost to Council.
- The proposal will not result in adverse environmental impacts and will create employment opportunities during construction and the ongoing retail uses.
- The proposal is suitable for the site and in the public interest.

1.0 Introduction

This Environmental Impact Statement (EIS) is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of a State Significant Development Application (SSDA) for the development of 26-42 Eden Street and 161-179 Princes Highway, Arncliffe (the site). It is proposed to redevelop the site into a mixed-use precinct with retail and residential uses, comprising both market and social housing, as part of the NSW Land and Housing Corporation (LAHC)'s 'Communities Plus' initiative.

As the proposed development has a capital investment value above \$30 million and is being carried out on land owned by the NSW Land and Housing Corporation, it is State Significant Development (SSD) by virtue of Clause 10, Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP).

This EIS has been prepared by Ethos Urban on behalf of Arncliffe Eden Property Pty Ltd and is informed by the Architectural Plans (**Appendix A**) and the Urban Design Report (**Appendix B**) prepared by Group GSA, and other supporting technical documentation appended to the report (refer to Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) and the relevant Secretary's Environmental Assessment Requirements (SEARs), which have been included at **Appendix C** and **Section 1.7**.

1.1 Overview of the Proposal

This EIS seeks approval for the following development:

- Demolition of all existing buildings and structures on the site;
- Site preparation works, excavation and tree removal;
- The construction of a mixed-use development comprising:
 - 744 apartments across (4) buildings between 19-23 storeys in height, as follows:
 - 186 market housing apartments in Building A;
 - 202 market housing apartments in Building B;
 - 180 social housing apartments in Building C; and
 - 176 market housing apartments in Building D;
 - 3,113m² retail gross floor area;
 - 240m² for a future childcare centre;
 - 3,706m² of communal open space;
 - 813 spaces of lower ground and basement car parking; and
- 4,870m² of publicly accessible open space including a 4,000m² park, an 870m² public plaza (meeting space), and through site link connecting Eden Street and the Princes Highway.

1.2 Development Objectives

A number of overarching objectives have guided the built form and design of the proposed development. These are summarised as follows:

- Seamlessly integrate the provision of social and market housing on a key opportunity site owned by LAHC, providing for a mixed tenure development with good social outcomes while optimising the value for money return for the NSW Government in line with the stated goals of the Communities Plus programme;

- Deliver a high quality built form with a vibrant mix of complimentary land uses including market and social housing, retail floorspace, a childcare centre and public open space, providing for an activated mixed use precinct that exhibits design excellence.
- Deliver a precinct that integrates with and respects the surrounding urban environment and the desired future character of the area envisioned under the *Bayside West Precincts 2036 Plan*, through a built form that enables uplift and urban renewal without introducing adverse environmental impacts.
- Provide for a high standard of street level activation, passive surveillance, and residential amenity through vibrant, well landscaped and diverse publicly accessible open spaces, retail tenancies and communal open space that catalyses the urban renewal of Arncliffe for the benefit of the local community.
- Meet the evolving needs of social housing tenants now and into the future through innovative, accessible, and adaptable apartment design.

1.3 Project Background and Communities Plus

The NSW Land and Housing Corporation (LAHC) is a public trading enterprise established under the *Housing Act 2001*. LAHC operates under the Department of Family and Community Services and is responsible for the management of the NSW Government's social housing portfolio, comprising some 130,000 properties. Social housing is primarily Government-owned accommodation that provides for individuals and families who are unable to access suitable accommodation on the private rental market.

LAHC is a self-funding agency, having historically funded the maintenance and provision of social housing through property sales and receipt of rental income from tenants. In 2015, LAHC launched the 'Communities Plus' program to deliver 23,000 new and replacement social housing dwellings, through the redevelopment of existing land. Notably, developments delivered under 'Communities Plus' are mixed-tenure, comprising a mixture of both social and market housing. This serves two purposes: to deliver truly integrated communities that avoids the concentration of large amounts of social housing, and to offset the cost of delivering new social housing.

26-42 Eden Street and 161-179 Princes Highway, Arncliffe (the 'Eden Street site') comprises one of the major sites identified for renewal and new social housing under Communities Plus. The site is owned by LAHC and currently comprises 142 social housing units. An invitation for Expressions of Interest (EOI) for redeveloping the site was released in May 2018 to private sector and not-for-profit organisations. Billbergia (Arncliffe Eden Property Pty Ltd) was successful in its tender for the site and is now partnering with LAHC to deliver 180 new social housing dwellings, contained within Building C. These dwellings will be managed by Evolve Housing, a Community Housing Provider (CHP).

To facilitate the site's redevelopment, *State Environmental Planning Policy (State and Regional Development) Amendment (Eden Street) 2018* was adopted on 12 October 2018 to amend the SRD SEPP to include the site as a LAHC State Significant Development Site. Furthermore, the Bayside West Precincts (Arncliffe, Banksia, and Cooks Cove) including the subject site had their planning controls amended under *State Environmental Planning Policy Amendment (Arncliffe and Banksia Precincts) 2018*, to reflect the NSW Government's *Bayside West Precincts 2036* plan to revitalise the area. The site retained its B4 Mixed Use zoning; the site's height limit increased from 28 metres to 70 metres, and the floor space ratio (FSR) limit increased from 2.5:1 to 4:1.

1.4 State Significant Development

The proposed development is State Significant Development (SSD) pursuant to Clause 10, Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) as it is located on land owned by LAHC, is being carried out on behalf of LAHC, and has a capital investment value of more than \$30 million (as further discussed in **Section 5.2.3** below).

1.5 Strategic Need for the Proposal

The proposed development has significant strategic merit. The 180 new social housing dwellings are critical social infrastructure and will deliver significant public benefits by housing people who are unable to access accommodation on the private market.

Social housing typically caters to low to very low income households, which typically comprise some of the most vulnerable members of society and include people in poor health (mental and physical) or escaping violent or abusive situations. There is an urgent need to increase the quality and quantity of social housing to meet the needs of NSW's most vulnerable in response to the unique social and economic challenges currently facing NSW as the state recovers from the COVID-19 pandemic, including unprecedented unemployment and economic hardship. The current NSW social housing portfolio cannot meet demand. As of 2017, there were approximately 60,000 approved applicants on the social housing waiting list.

Furthermore, the proposed development is consistent with the strategic planning direction for the site as documented by the *Bayside West Precincts 2036 Plan*, which identifies the Arncliffe Planned Precinct, in addition to the Banksia and Cooks Cove Planned Precincts, as being well placed for urban renewal to accommodate additional housing with an expected 5,000 new homes over the next 20 years. Under the 2036 Plan, the site is identified as being for 'High density housing with mixed use opportunities' (**Figure 1**) which is entirely consistent with the proposed development. Consistency with the 2036 Plan and other strategic documentation is further provided in **Section 5.1** below.

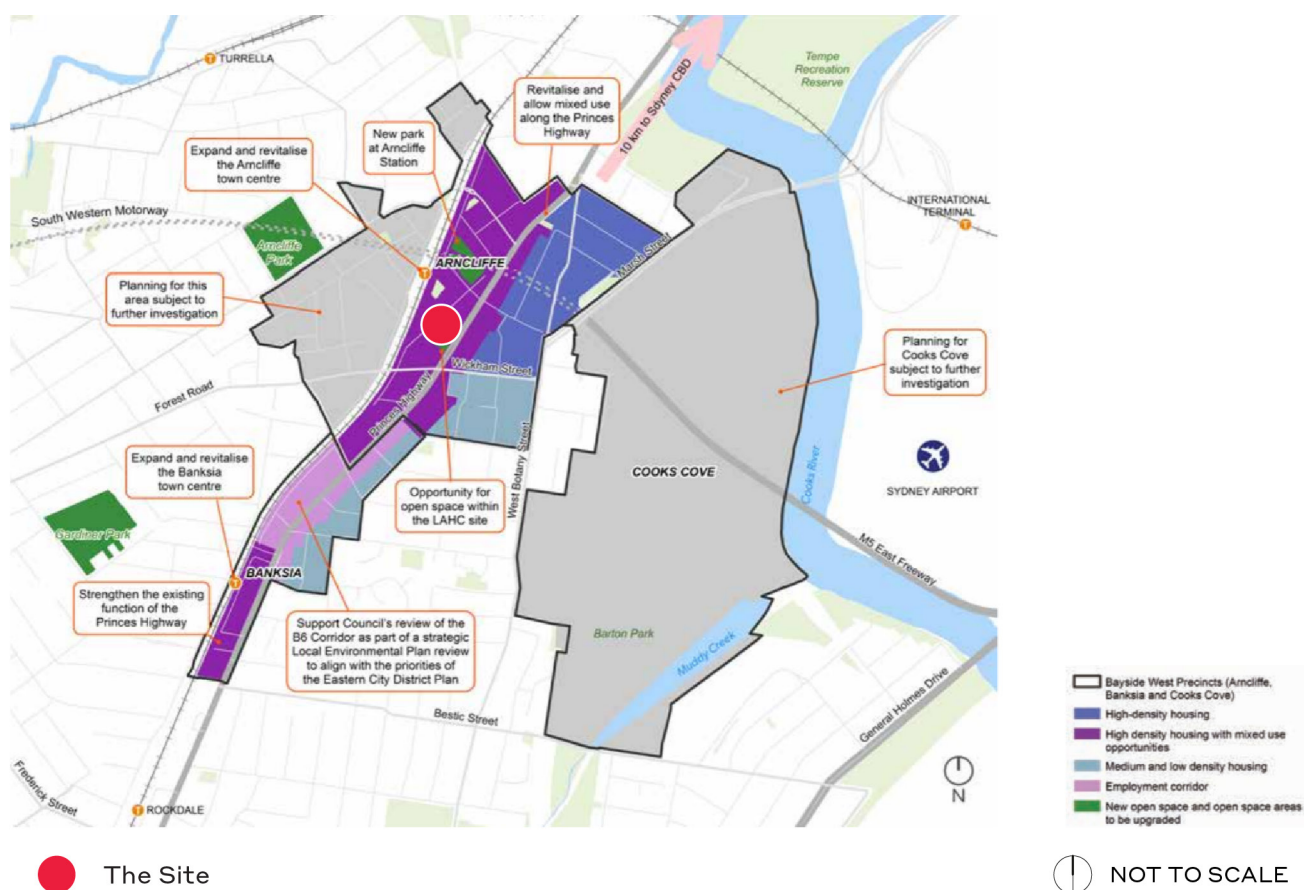


Figure 1 Location of the site within the Bayside West Planned Precincts (Arncliffe, Banksia, Cooks Cove) Masterplan

Source: DPIE

The proposed development responds to the need to improve the quantity and quality of NSW's social housing portfolio and the desired future character of Arncliffe and exhibits strategic merit.

1.6 Analysis of Alternatives

The site is associated with social housing, being owned by the Land and Housing Corporation, and identified as a key LAHC development site under Clause 10 of Schedule 2 of the SRD SEPP. This is reinforced by the site's inclusion in the 'Communities Plus's scheme. Therefore, development of the site for other purposes (e.g., entirely commercial uses) would be contrary to the site's strategic responsibility and long standing residential land use.

The following scenarios have been considered:

- Do nothing.
- Upgrade the existing social housing buildings at the site.
- Redevelop the site to provide new social housing supported by market housing (the proposed development).

Doing nothing would fail to deliver the substantive public benefits offered by the proposed development. It would not result in the construction of high quality social housing at a key opportunity site owned by LAHC as envisioned under the Communities Plus initiative and would not contribute to urban renewal in Arncliffe as envisioned under the *Bayside West Precincts 2036 Plan*. The site would continue to exhibit poor pedestrian permeability, poor street level activation, and poor residential amenity with a dated built form that does not meet the needs of social housing tenants today.

Similarly, upgrading the existing social housing buildings represents a missed opportunity to enable the site to make a major contribution to the renewal of the Arncliffe town centre. It would not respond to the need to increase social housing, or to activate the site under the outcomes of the 2036 Plan. It would also be contrary to the strategic planning work undertaken to date, including the designation of the site as a key LAHC development site under the SRD SEPP and the amended planning controls under the Bayside West Precincts Plan.

The proposed redevelopment of the site to provide new social housing, supported by market housing, with retail, publicly accessible open space and through site links provides a contemporary response in keeping with the strategic planning expectations for the site. The proposed development increases the total amount of social housing on the site and provides significant amenity improvements for future residents. Further, the new market housing will help fund the new social housing as discussed in **Section 1.3** above and result in the creation of a truly integrated community.

1.7 Secretary's Environmental Assessment Requirements

In accordance with section 4.39 of the EP&A Act, the Secretary of the DPIE issued the requirements for the project (SSD-11429726) on 18 December 2020. A copy of the Secretary's Environmental Assessment Requirements (SEARs) is attached at **Appendix C**. This EIS has been structured to respond to these SEARs.

Table 1 below provides a detailed summary response of the individual matters as listed in the SEARs and identifies where each requirement has been addressed in this EIS and the accompanying appended technical studies.

Table 1 Secretary's Environmental Assessment Requirements

Requirement	Relevant report section	Relevant appendix
General requirements		
A development application (DA) for State Significant Development (SSD) must include all relevant information and documents specified in Part 1 of Schedule 1 of the Regulation, including an environmental impact statement (EIS) (section 4.12(8) of the Act and clause 2(1)(e) of Schedule 1 of the Regulation).	Environmental Impact Statement – throughout report.	
The DA must be lodged on the NSW Major Projects planning portal (clause 50(1)(d) of the Regulation).		
The form and content of the EIS must be prepared in accordance with clauses 6 and 7 of Schedule 2 of the Regulation. Any document adopted or referenced in the EIS will form part of the EIS (clause 9(1) of Schedule 2 of the Regulation).		

Requirement	Relevant report section	Relevant appendix
<p>The EIS must include a report from a qualified quantity surveyor, certified to be accurate at the time of publication, providing:</p> <ul style="list-style-type: none"> a detailed calculation of the capital investment value (CIV) of the proposal (as defined in cl 3 of the Regulation), including details of all assumptions and components from which the CIV calculation, including consultant costs. an estimate of jobs that will be created during the construction and operational phases of the proposal. 	N/A	Appendix D
Key issues to be addressed		
<p>1. Statutory and strategic context The EIS must:</p> <ul style="list-style-type: none"> address all relevant legislation (including sections 1.3 and 4.15 of the Act and clauses 6 and 7 of Schedule 2 of the Regulation), Environmental Planning Instruments (EPIs), draft EPIs, plans, policies and guidelines. detail the nature and extent of any prohibitions, including partial prohibitions, that apply to the development. identify compliance with applicable development standards and provide a detailed justification for any non-compliances. address the requirements of any approvals applying to the site, including any concept approval or recommendations from any Gateway determination. comply with these SEARs (cl 3(8) of Schedule 2 of the Regulation). 	Environmental Impact Statement – throughout report.	
<p>2. Design excellence The EIS must include a Design Excellence Strategy demonstrating how:</p> <ul style="list-style-type: none"> the development will achieve design excellence in accordance with the relevant EPI provision and objectives for good design (of the built environment) in Better Placed. the detailed design has been reviewed by the SDRP, and advice addressed, prior to lodgement. design integrity will be maintained in subsequent stages of the planning process (such as post approval and in any modifications). 	Section 5.3	N/A
<p>3. Built form and design The EIS must:</p> <ul style="list-style-type: none"> explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. demonstrate how the proposed building (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality demonstrate how the detailed building design will deliver a high-quality development, including consideration of façade design, articulation, activation, roof design, materials, finishes, colours and integration of services. 	Section 4.6 Section 5.5	Appendix B
<ul style="list-style-type: none"> address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development. 	Section 5.15	Appendix F
<ul style="list-style-type: none"> assess how the development complies with the relevant accessibility requirements. 	Section 5.16	Appendix G
<ul style="list-style-type: none"> include a table identifying the proposed land uses, including a floor by floor breakdown of gross floor area (GFA), total GFA and FSR. 	Section 4.3	N/A
<ul style="list-style-type: none"> identify opportunities for Aboriginal culture and heritage to be incorporated holistically in the design proposal. 	Section 5.11	Appendix B
<p>4. Visual impacts The EIS must include a Visual Impact Assessment, with photomontages, justifying potential visual impacts associated with the proposal when</p>	Section 5.7	Appendix H

Requirement	Relevant report section	Relevant appendix
compared to the existing situation and a compliant development (if relevant), when viewed to and from key vantage points.		
5. Public domain The EIS must demonstrate how the development: <ul style="list-style-type: none"> • maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site). • reflects relevant design guidelines and advice from Council and the Department. • ensures the public space is welcoming, attractive and accessible for all. • maximise permeability and connectivity. • ensures public spaces have excellent amenity, suitable for their intended use, such as through adequate facilities, solar access, shade and wind protection. • maximises street activation. • minimises potential vehicle, bicycle and pedestrian conflicts. 	Section 4.7	Appendix B
6. Trees and landscaping The EIS must include a Landscape Plan and Arborist Report, that: <ul style="list-style-type: none"> • details the proposed landscaping and planting, including proposals for native vegetation communities and plant species. • demonstrates how the development proposes to protect and increase the urban tree canopy. • includes justification for any tree and vegetation removal. • demonstrates how the development maximises opportunities for green infrastructure, consistent with Greener Places. 	Section 4.8 Section 5.19	Appendix I (landscape) Appendix J (arborist assessment)
7. Environmental amenity The EIS must: <ul style="list-style-type: none"> • demonstrate how the proposal achieves a high level of environmental amenity within the proposal and on surrounding buildings, assessing impacts associated with view loss, ventilation, pedestrian movement, access to landscape and outdoor spaces, visual privacy, lighting and wind. 	Section 5	Appendix B (urban design) Appendix H (visual impact) Appendix K (wind impact)
<ul style="list-style-type: none"> • provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding buildings and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development. 	Section 5.6	Appendix A
<ul style="list-style-type: none"> • provide an assessment of the development against State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development and the associated guidelines. 	Section 5.9	N/A
8. Social housing The EIS shall: <ul style="list-style-type: none"> • detail the integration and mix of private and social housing. • outline the intended operation of the social housing by community housing provider/s. 	Section 4.4	N/A
9. Development contributions and public benefit The EIS must: <ul style="list-style-type: none"> • include a Social Infrastructure Study to support any proposed community infrastructure on the site. 	N/A – no community infrastructure floorspace is proposed.	
<ul style="list-style-type: none"> • address the requirements for monetary contributions, dedication of land and/or works-in-kind and include details of any proposals for further material public benefit. Where the development proposes alternative public benefit or a departure from an existing contributions framework, this is to be agreed with Council and the relevant State agency, prior to lodgement. 	Section 4.10	N/A

Requirement	Relevant report section	Relevant appendix
10. Transport, traffic, parking and access (operation and construction) The EIS must include: <ul style="list-style-type: none"> a Traffic and Transport Impact Assessment which provides: <ul style="list-style-type: none"> the predicted transport mode share split for the proposal development. an analysis of the existing traffic network, including the road hierarchy, current daily and peak hour vehicle movements and existing performance addressed levels of nearby intersections. a forecast of additional daily and peak hour vehicle movements as a result of the proposal (using SIDRA modelling or similar at 5 year intervals) and identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cycle conflict). proposals to mitigate any traffic impacts, including intersection upgrades to achieve acceptable performance. details of car parking provision, having regard to relevant parking rates, specifications and standards. details of proposed vehicular access, loading, deliveries and servicing arrangements, and any proposed infrastructure improvements or measures to reduce potential conflicts with pedestrians and cyclists. proposals to improve walking and cycling, such as connections into existing walking and cycling networks, high quality end-of-trip facilities and adequate bicycle parking for visitors, employees and residents (provided in accordance with the relevant rates, specifications and standards). measures to promote sustainable travel choices for employees, residents or visitors, such as minimising car parking provision, encouraging car share and public transport, cycling and walking, implementing a green travel plan and providing end of trip facilities. 	Section 5.10	Appendix N
<ul style="list-style-type: none"> a Construction Traffic Management and Pedestrian Management Plan providing details of predicted construction traffic movements, routes and access arrangements, and outline how construction traffic impacts on existing traffic, pedestrian and cycle networks would be appropriately managed and mitigated. 	Section 5.10.1	Appendix N
11. Noise and vibration The EIS must include a noise and vibration assessment in accordance with the relevant EPA guidelines, including Development Near Rail Corridors and Busy Roads – Interim Guideline. This assessment must detail construction and operational noise impacts on nearby sensitive receivers and outline the proposed management and mitigation measures that would be implemented.	Section 5.13	Appendix P
12. Ecologically Sustainable Development (ESD) and climate change The EIS must: <ul style="list-style-type: none"> identify how ESD principles (as defined in clause 7(4) of Schedule 2 of the Regulation) will be incorporated into the design, construction and ongoing operation of the development. demonstrate how future buildings will meet or exceed the relevant industry recognised building sustainability and environmental performance standards. demonstrate how the proposal incorporates measures to minimise carbon emissions, reflecting the Government's goal of net zero emissions by 2050, and the consumption of resources, water (including through water sensitive urban design) and energy. 	Section 5.18	Appendix Q
13. Contamination The EIS must include a preliminary investigation assessing and quantifying any soil addressed or groundwater contamination and demonstrating that the site is suitable (or may be made suitable after remediation) for the proposed use, in accordance with the <i>State Environmental Planning Policy No 55 - Remediation of Land</i> and the associated guidelines.	Section 5.20	Appendix R

Requirement	Relevant report section	Relevant appendix
Where recommended in the preliminary investigation, or requested by the Planning Secretary, the EIS must also include a detailed site investigation, a remediation action plan and/or a preliminary long-term environmental management plan.		
14. Heritage The EIS must include: <ul style="list-style-type: none"> a statement of heritage significance and an assessment of the impact on the heritage significance of any heritage items, or conservation areas, on and adjacent to the site in accordance with the relevant guidelines. address any archaeological potential and significance on the site and the impacts the development may have on this significance. 	Section 5.12	Appendix O
<ul style="list-style-type: none"> an Aboriginal Cultural Heritage Assessment Report in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site, including archaeology. 	Section 5.11	Appendix S
15. Flooding The EIS must: <ul style="list-style-type: none"> identify any flood risk on-site having regard to adopted studies for the development site, consideration of any relevant provisions of the NSW Floodplain Development Manual and the potential effects of climate change, sea level rise and an increase in rainfall intensity. assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions to mitigate flood risk where required. 	Section 5.21	Appendix T
16. Ground conditions The EIS must demonstrate that the proposed development can be accommodated on the site, having regard to any geotechnical and acid sulphate soil impacts.	Section 5.20	Appendix R
17. Stormwater and drainage The EIS must include an Integrated Water Management Plan that: <ul style="list-style-type: none"> is prepared by a suitably qualified person in consultation with Council and any other relevant drainage authority. details the proposed drainage design for the site including on-site detention facilities, water quality measures and the nominated discharge point. demonstrates compliance with Council or other drainage authority requirements and avoid adverse impacts on any downstream properties. Where drainage infrastructure works are required that would be handed over to Council, provide full hydraulic details and detailed plans and specifications of proposed works that have been prepared in consultation with Council and comply with Council's relevant standards.	Section 5.22	Appendix U
18. Biodiversity The EIS must assess any biodiversity impacts associated with the proposal in accordance with the <i>Biodiversity Conservation Act 2016</i> and the Biodiversity Assessment Method 2020, including the preparation of a Biodiversity Development Assessment Report, unless a waiver is granted.	Section 5.23	Appendix V
19. Waste and servicing The EIS must: <ul style="list-style-type: none"> identify, quantify and classify the likely waste to be generated during construction and operation. describe measures to be implemented to minimise, reuse, recycle and safely dispose of this waste. identify appropriate servicing arrangements. 	Section 5.25	Appendix W <small>(construction)</small> Appendix X <small>(operational)</small>
20. Social impact The EIS must include Social Impact Assessment in accordance with the Social Impact Assessment Guideline.	Section 5.14	Appendix CC
21. Staging	N/A – no staging is proposed	

Requirement	Relevant report section	Relevant appendix
If relevant, the EIS must provide details regarding the staging of the proposed development.		
22. Aviation The EIS must include a report prepared by a suitably qualified Aviation expert: <ul style="list-style-type: none">identifying whether the proposed development is located within any of the applicable Australian Noise Exposure Forecast (ANEF) contours.providing details of any flight paths that may be impacted by the proposed development.assessing any potential impacts, including construction cranes, of the development on the aviation operations and protected airspace of any nearby airports and affected flight paths of any existing HLS.address the need for approval from the Department of Infrastructure, Transport, Regional Development and Communications, as required.	Section 5.8	Appendix Y
23. Air quality The EIS must include an air quality assessment of onsite and offsite air quality impacts, including odours, in accordance with the relevant EPA guidelines. The assessment must detail construction and operational air quality impacts both onsite and on nearby sensitive receivers and outline the proposed management and mitigation measures that would be implemented.	Section 5.24	Appendix Z
24. Utilities The EIS shall: <ul style="list-style-type: none">identify and address the existing capacity to service the proposed development and any augmentation requirements for utilities in consultation with relevant agencies.identify any potential impacts of the proposed construction and operation on existing utility infrastructure and demonstrate how these assets will be addressed protected, or impacts mitigated.	Section 5.26	Appendix AA
Plans and documents		
The EIS must include all relevant plans, architectural drawings, diagrams, lists, certificates, and any other documentation required under Schedule 1 of the Regulation. If the Department identifies any other document required to be included in the EIS before the DA is lodged, those documents must also be included in the EIS.	N/A – noted.	
Consultation		
During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, Government Architect NSW (through the NSW SDRP process), utility providers, community groups and affected landowners, as identified in any meeting with the Department before the DA is lodged. The EIS must describe the consultation process, the issues raised during consultation, and how the proposal addresses those issues. Where amendments have not been made to address an issue, a succinct explanation should be provided.	Section 3	Appendix BB

2.0 The Site

2.1 Site Location and Context

The site is located in Arncliffe, in the Bayside Local Government Area (LGA) as shown in **Figure 2** below. Surrounding land uses are predominantly a mix of low, medium, and high density residential. Arncliffe railway station is located approximately 100 metres to the northwest of the site.

The site is located within the Arncliffe Planned Precinct, as identified under the *Bayside West Precincts 2036 Plan* (see **Section 5.1**). Within the Planned Precinct, the site is identified as being for 'High density housing with mixed use opportunities'. Planned Precincts are areas with good access to existing or planned transport infrastructure that have the potential to provide for significant growth in housing and jobs.

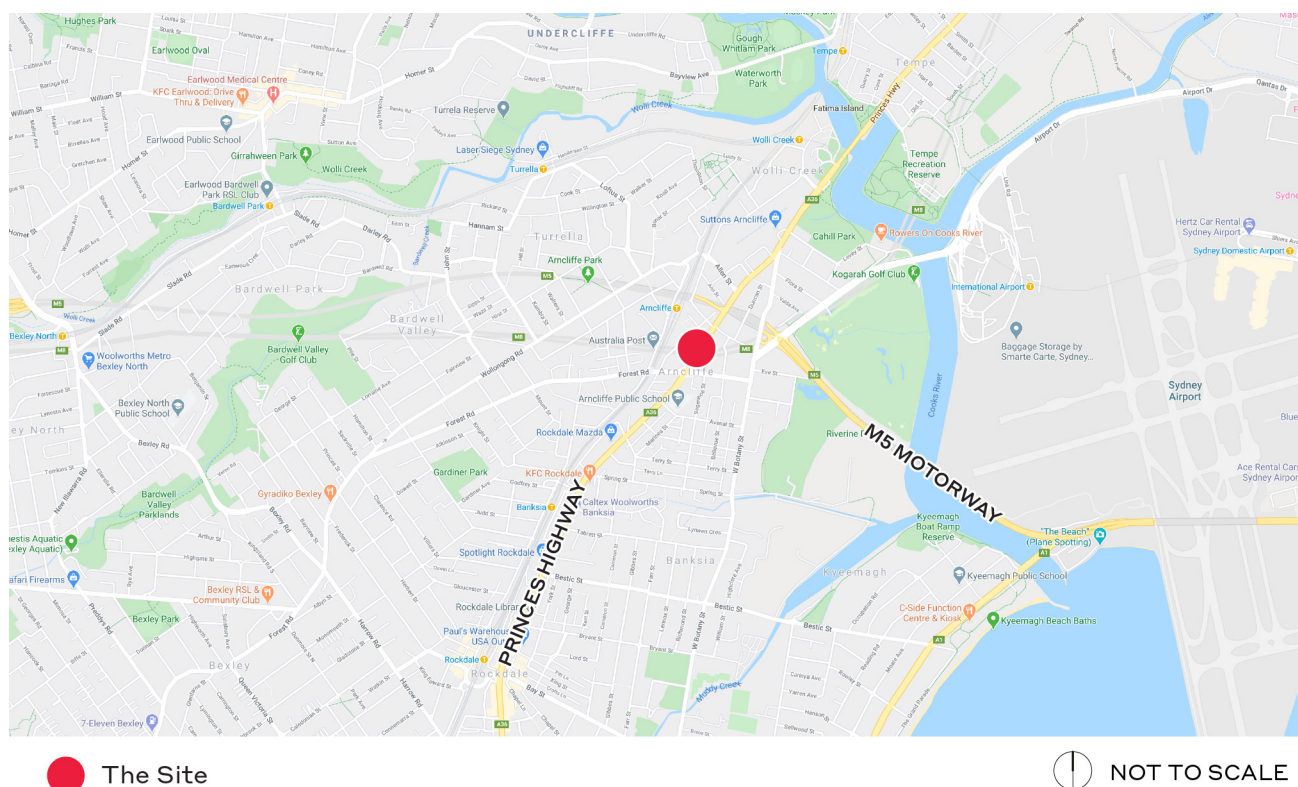


Figure 2 Site context

Source: Google Maps, edits by Ethos Urban

2.2 Site Description

The site is known as 26-42 Eden Street and 161-179 Princes Highway, Arncliffe. It is 13,440.3m² in size and is irregular in shape. It comprises the Eden Street State Significant site (see **Section 5.2.2**). The site comprises a total of 13 allotments, as described in **Table 3** and **Figure 3** below. A site survey has been prepared by SDG, and is attached to this EIS at **Appendix E**.

Table 2 Site legal description

Lot no. (Figure 4)	Title	Approx. area (m ²)
1	Lot 1 / DP447649	6,207.3m ²
2	Lot 12 / DP23701	616m ²
3	Lot 11 / DP23701	622m ²
4	Lot 10 / DP23701	639m ²
5	Lot 9 / DP23701	658m ²
6	Lot 8 / DP23701	651m ²
7	Lot 7 / DP23701	611m ²
8	Lot 1 / DP23701	641m ²
9	Lot 2 / DP23701	632m ²
10	Lot 3 / DP23701	861m ²
11	Lot 26 / DP1228031	837m ²
12	Lot 25 / DP1228031	425m ²
13	Lot 3 / DP1094906	125m ²
Total site area		13,440.3m²

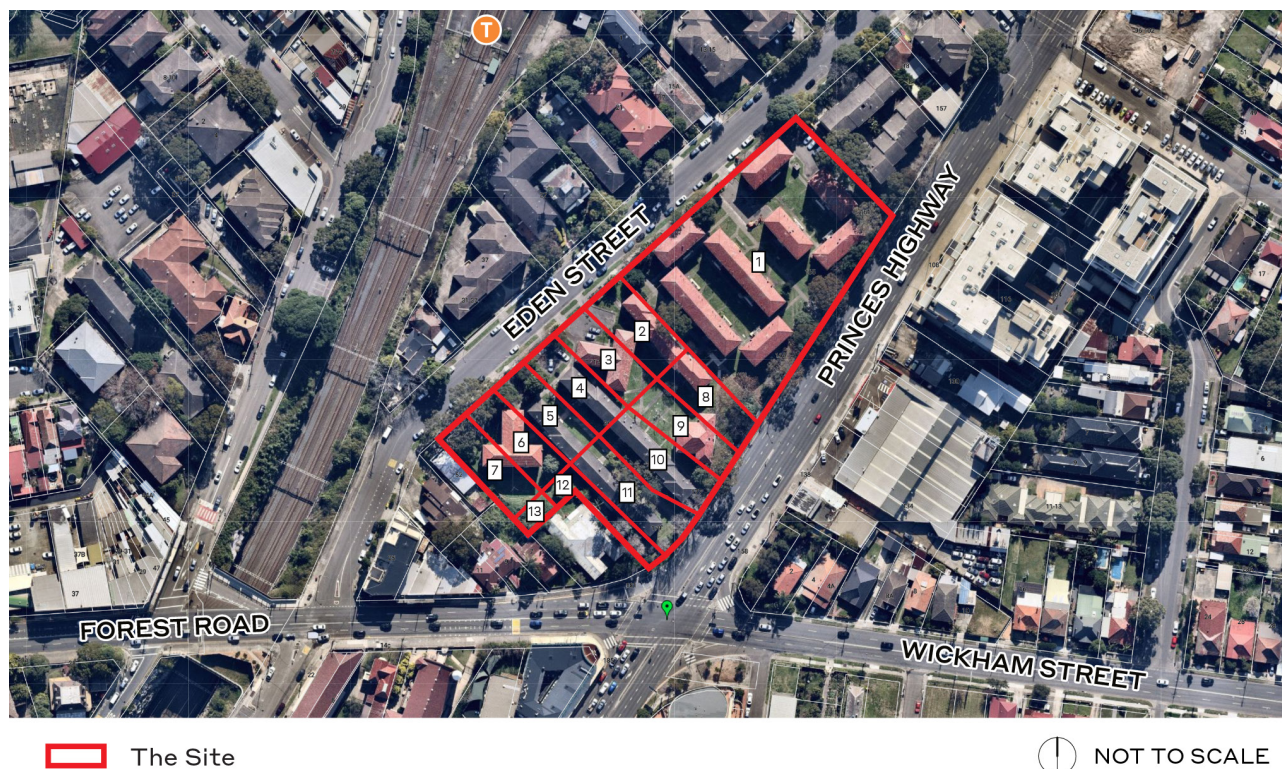


Figure 3 Site aerial and subject lots

Source: Nearmap, additional edits Ethos Urban

2.3 Existing Development

Existing development on site comprises 14 x 3 storey residential buildings containing 142 social housing dwellings, at grade car parking and landscaping. The existing buildings are outdated and generally no longer meet the needs of tenants. The dwellings do not accommodate permanent residents and are currently used as temporary housing. They are proposed to be vacated in late 2022 – refer to **Section 4.4** below. **Figures 4 – 7** illustrate the existing development on site.



Figure 4 View from the northern end of Eden Street looking south

Source: Ethos Urban



Figure 5 View from the southern end of the Eden Street looking northeast

Source: Ethos Urban



Figure 6 View from the corner of Princes Highway and Forest Road looking north

Source: Ethos Urban



Figure 7 View from the northern end of the Princes Highway looking southwest

Source: Ethos Urban

2.4 Access and Transport

As shown in **Figure 10**, the site is well served by Sydney's arterial road network. The Princes Highway, forming part of the A36 arterial route, is located directly adjacent to the site. Access to the M5 Motorway tunnels is provided approximately 280 metres to the east. The new M8 Motorway tunnels also pass within proximity of the site, with access to the M8 provided via the St Peters interchange approximately 3 kilometres to the northeast. The site is also in the immediate proximity of Airport Drive which provides access to Kingsford-Smith Airport and Mascot.

The site is also very well served by public transport. Arncliffe railway station is located 100 metres to the northwest of the site. The station is served by T4 Eastern Suburbs and Illawarra Line services by Sydney Trains, with frequent services to the Sydney CBD and Southern Sydney. Arncliffe station is approximately 8-9 kilometres southwest of the Sydney CBD, with a travel time between it and Central station of around 17 minutes. It should also be noted that the site is within relative proximity of Wolli Creek railway station approximately 1 kilometre to the northeast, which offers interchange with T8 Airport and South Line services to the Airport, Mascot and South Western Sydney. The site is also serviced by the 420 bus service, which operates between Eastgardens and Burwood via Sydney Airport and Rockdale, and the 422 between Kogarah and Central.

Existing vehicular access is from Eden Street only (**Figure 8**). Existing pedestrian access is provided from both Eden Street and the Princes Highway. Although the site currently contains pedestrian through-site links, they are narrow and uninviting (refer **Figure 9**).



Figure 8 On-site parking accessed from Eden Street

Source: Ethos Urban



Figure 9 Existing through-site link

Source: Ethos Urban

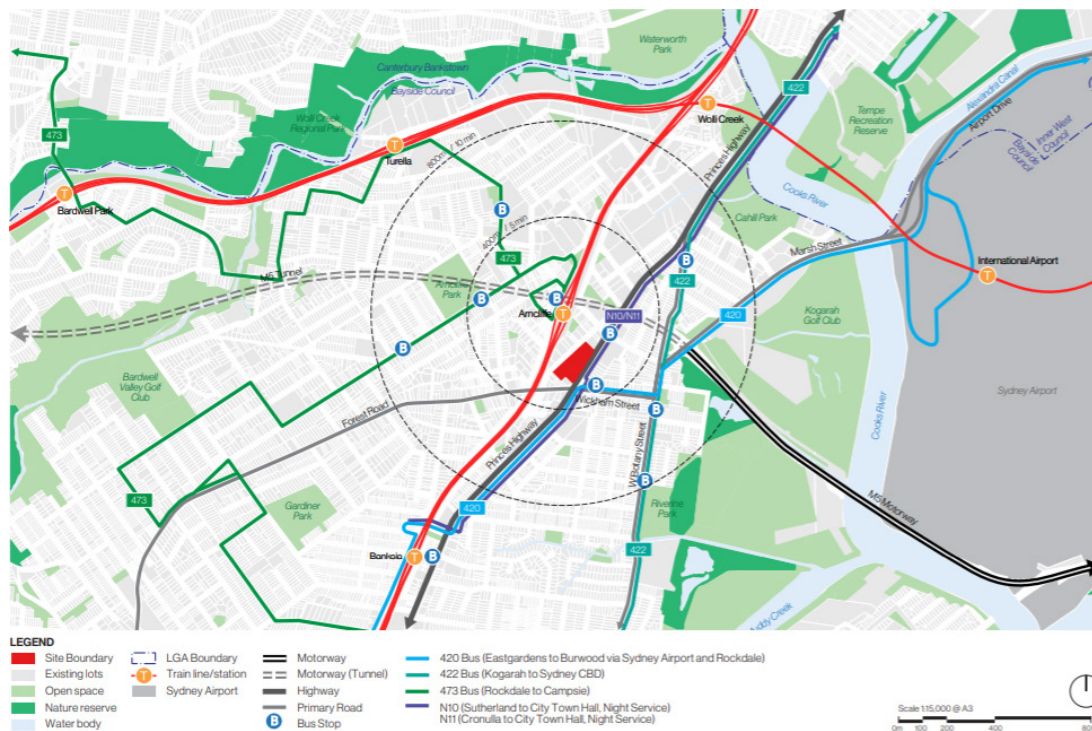


Figure 10 Existing road and public transport arrangements at the site

Source: Group GSA

2.5 Site Topography

The site slopes from south to north with an approximate change in level of 11 metres across the site as shown in **Figure 11** below. The highest point of the site is its south-western corner at Eden Street, while its lowest part is its north-western corner at Eden Street near The Arcade.



Figure 11 Site Topography

Source: Group GSA

2.6 Surrounding Development

Surrounding land uses are predominantly residential and comprise a variety of densities ranging from detached dwellings to high density apartments. Immediately to the northeast of the site are two 4-storey apartment buildings known as 20-24 Eden Street (**Figure 12**), with other apartment buildings and detached dwellings located further north. Residential apartment buildings, ranging from 2-4 storeys, are located across the site's long Eden Street frontage to the northwest (**Figure 13**).

To the south of the site, between the site and the Forest Road, are a number of detached dwellings, attached dwellings, as well as shop top housing and retail uses at the corner of Forest Road and Eden Street (**Figure 14**). To the east of the site, across the Princes Highway, are remnant industrial uses in addition to the recently constructed 10 storey mixed-use 'Endeavour Apartments' at 118 Princes Highway (**Figure 15**).



Figure 12 20-24 Eden Street

Source: Ethos Urban



Figure 13 Residential flat buildings across Eden Street

Source: Ethos Urban



Figure 14 Residential dwellings and shop top housing to the south of the site

Source: Ethos Urban



Figure 15 Endeavour Apartments, 118 Princes Highway

Source: Ethos Urban

3.0 Pre-Lodgement Consultation

In response to the SEARs, pre-lodgement consultation was undertaken with the following bodies:

- The Department of Planning, Industry and Environment (DPIE);
- Bayside Council;
- The NSW Government Architect through the State Design Review Panel (SDRP) process;
- Relevant utility providers; and
- The local community.

The following sections summarise the consultation process undertaken to date, the issues raised by the stakeholders during consultation, and how the project team has responded to and addressed these issues.

3.1 Department of Planning, Industry and Environment

The applicant met with the DPIE Key Sites team on 4 November 2020 and 11 May 2021 to discuss the proposal and representatives from the Key Sites team attended the SDRP meetings (9 September 2020; 21 October 2020; and 3 March 2021). DPIE have not provide any formal feedback in addition to the SEARs.

3.2 Bayside Council

A pre-DA meeting with held online between the project team and Bayside Council on 30 November 2020 to discuss the project. Present at the meeting were members from the project team (including applicant, project architect, planning team, and transport consultant), representatives from Council, and representatives from the Land and Housing Corporation (LAHC).

Pre-DA comments were provided by Council in the SEARs response. **Table 3** considers the Council's Pre-DA comments.

Table 3 Response to Council feedback

Issue	Applicant's response
Should the proposal not include a community facility, full compliance with the height and floorspace ratio controls should be met.	The proposal does not include a community facility. The SSDA proposes minor variations to the maximum height and floor space ratio controls which are justified on planning grounds. Clause 4.6 variation requests are provided at Appendix L and Appendix M , with further discussion provided in Section 5.3 .
The setback to Eden Street does not comply with the DCP front setback requirement of 3 metres (Part 7. 7 of the DCP). This should be amended to comply.	The design of the development has been amended to comply with the minimum 3 metre setback along Eden Street. Refer to drawing DA-4120 of the Architectural Plans at Appendix A demonstrating compliance.
Consideration should be given to increasing the amount of deep soil zones where possible.	The proposed development includes a 941m ² of deep soil area within Eden Street Park (refer to drawing DA-4300) comprising 7% of the site area which achieves the ADG design criteria.
The Princes Highway frontage of the site is identified as an Active Street Frontage in the Rockdale LEP 2011. Residential apartments cannot be supported at ground level on either frontage.	Residential apartments are not proposed at ground level on the Princes Highway frontage.
Consideration of the safety and visual privacy concerns onto the outdoor space of the childcare centre.	Safety and visual privacy have been considered in the design of the childcare centre. Refer to the CPTED Assessment prepared by Ethos Urban at Appendix F and Section 5.15 below.
Inclusion of mitigation measures to reduce impacts from potential noise and vibration from the retail uses at ground level to the residential units above.	The proposal has been designed to mitigate noise from all sources including the Princes Highway, the rail line and the future retail precinct.
An acoustic report, odour report and detailed waste management report should be provided with the application.	The following reports have been attached to the EIS: <ul style="list-style-type: none"> • Noise and Vibration Assessment at Appendix P (refer to Section 5.13);

Issue	Applicant's response
	<ul style="list-style-type: none"> Construction Waste Management Plan at Appendix W (refer to Section 5.25); and Operational Waste Management Plan at Appendix X (refer to Section 5.25). <p>Odour will be addressed as part of the fitout of future tenancies given that tenants are yet to be confirmed. The layout of the tenancies have been designed so that no adverse odour impacts are expected.</p>

3.3 NSW Government Architect

The project team met with the NSW Government Architect's State Design Review Panel (SDRP) on three occasions: 9 September 2020; 21 October 2020; and 3 March 2021. As the project was granted an architectural design competition waiver (**Appendix GG**), the SDRP process has been utilised to ensure that the proposal demonstrates Design Excellence.

The SDRP confirmed in their notes from the 3 March 2021 meeting that they were satisfied with the ongoing evolution of the proposed development, including incorporation of the Panel's design recommendations. This was summarised in the letter issued by GANSW following the third meeting as follows:

Engagement to date with the SDRP process and advice provided by the panel has been sincere and positive. Numerous aspects of the project continue to develop and improve through a collaborative discussion.

A summary of the key topics discussed in these meetings is provided in **Table 4** below.

Table 4 NSW Government Architect comments and feedback

Comment
Meeting 1 – 9 September 2020
<ul style="list-style-type: none"> The SDRP found the scheme presented to be a comprehensive response to the site and brief, being one that "has engaged with the challenge in many ways" but found more thorough examination of the presented principles to be required. The SDRP questioned the need for GFA to be distributed in four towers as opposed to a longer, lower built form. Given the site's historical context, the SDRP recommended that a rigorous response to Aboriginal habitation and the continuing Indigenous narrative post-colonial occupation be provided. More fine-grain and outwards facing activation of the retail tenancies was found to be required with regards to proposal's public spaces. The presented scheme involved all vehicle movements (supermarket deliveries, servicing, retail, and resident parking) using one driveway, which was not supported. Clearer traffic modelling was found by the SDRP to be required. The SDRP supported the indistinguishable nature of the social housing tower (Building C) from the market housing. The SDRP noted that a comprehensive ESD strategy is required given the development's size and scope.
Meeting 2 – 21 October 2020
<ul style="list-style-type: none"> The SDRP found that "many of the concerns raised by the panel in SDRP 01 have been meaningfully interrogated by the project team and strong improvements to the proposed design were noted." The SDRP supported the now clearer definition between private and public space, which was found to improve legibility within the site. The newly introduced Meeting Place and other public open spaces for the community were strongly encouraged, but it was noted that further refinement was needed, including opportunities for more activation. Amendments to the podium and ground plane made the SDRP more supportive of distributing GFA in four towers, as "contributing to a richer and more contextual spatial outcome." Retail uses were redistributed across the site through a network of smaller alleys and finer grain tenancies within the podiums, which was found by the SDRP to improve perimeter activation and hence supported. The Aboriginal Culture and Heritage response by the project team was found to be promising but was still too surface level. The amended distribution of communal open space was found to be encouraging, including the provision of new rooftop gardens to ensure around-the-year solar access.

Comment
<ul style="list-style-type: none"> The presented scheme at that point did not include a rooftop garden for Building C and instead an overshadowed location at podium level, which was not supported. The 4,000m² new public park (Eden Street Park) now being entirely open to the sky was supported. The demarcation between truly public and privately owned space was found to require further clarification. Amended traffic circulation measures to separate vehicle movements was supported but the parking provision was found to be excessive. The development of the built form was found by the SDRP to have resulted in improvements where the buildings meet the ground. The development's approach to sustainability was found to require further development.
Meeting 3 – 31 March 2021
<ul style="list-style-type: none"> The SDRP confirmed that the design in general had continued to develop and improve through collaborative discussion. Amendments to the landscaping scheme were commended as being “meaningful and positive”. Definition between private and public space was found to have been further improved. Further consultation with the Aboriginal Community and the development of strategies around Indigenous landscape, including connection to Country ideas informing design decision making at an architectural level was found to be positive. The overall massing and open space proposition were now supported, including relocation of the Building C communal open space to the rooftop. The reduction in car parking by 150 spaces was supported. The development of two consolidated podiums (Buildings A+B; Buildings C+D) was supported but further refinement was encouraged. The overall site planning strategy and open space provision was found to perform well in terms of solar access to communal spaces, but a rigorous assessment of building sustainability was encouraged.

The design review panel process has been an iterative process and the proposal has been amended to respond to the Panels comments.

3.4 Utility Providers

Consultation was undertaken with the following utility providers as detailed in the Infrastructure Management Plan (IMP) at **Appendix AA**:

- Sydney Water (water authority);
- Jemena (gas authority);
- Ausgrid (electrical authority).

The IMP concludes that there is generally adequate infrastructure capacity to support the proposed development. The applicant will continue to consult with the relevant infrastructure providers should the development progress to the Construction Certificate stage. Further discussion is provided in **Section 5.26** below.

3.5 Community Consultation

Community consultation undertaken is discussed in detail in the Communication and Engagement Report at **Appendix BB**. Consultation was undertaken over a three-week period in May 2021 and was focused on community and neighbours in and around the site who were considered likely to have an interest in the proposal. The following consultation was undertaken:

- Written communication and an opportunity for a briefing was sent by LAHC to Local Members of Parliament (MP's), Bayside Council and Non-Government social housing and support organisations in the local area as follows:
 - Local MPs and Council:
 - Federal Member for Barton, Linda Burney MP;
 - State Member for Rockdale, Stephen Kamper MP;
 - Bayside Council General Manager, Meredith Wallace;

- Non-Government Organisations:
 - St George Area Tenant Council;
 - St George Mental Health Team; and
 - 3 Bridges Community.
- An A5 project flyer with an invitation to drop-in events was prepared and distributed via letterbox drop to approx. 2,000 households in and around the site on 6 May 2021.
- 500 copies of the A5 project flyer were also handed-out at the entrance to Arncliffe Station, on the afternoon of 11 May 2021.
- A dedicated web page on Billbergia's website, www.billbergia.com.au/arncliffe/ was established, including project information and ability to contact the project team.
- Two drop-in events were held at Coronation Hall in Arncliffe and staffed by members of the project team, alongside representatives from LAHC, the Department of Communities and Justice (DCJ) and Evolve Housing. An Arabic interpreter was also present. The drop-in events were held as follows:
 - Monday 17 May from 2pm to 4pm; and
 - Tuesday 18 May from 5pm to 7pm.

The above initiatives resulted in the following outcomes:

- Approximately 16 people attended the two drop-in events. Of the people who attended, three people wrote comments on feedback forms. Other attendees provided verbal comments or raised questions about the proposal directly with project team members.
- Currently, no enquiries have been received through the project webpage.

Questions were raised by attendees with regards to the scale of development, parking and traffic, retail and shopping, environmental performance, public transport, green space, and expected construction impacts. These issues are discussed in detail in **Appendix BB**.

There was general support for the proposed retail and active street frontages, Eden Street Park, and access to greenspace. Some concerns were raised about the parking rates being either excessive or insufficient, as well as construction impacts. No significant opposition was voiced in relation to the proposed development.

3.6 Post Lodgement Consultation

The proposed development will be placed on public exhibition in accordance with the *Environmental Planning and Assessment Regulation 2000*. During the public exhibition period Council, State agencies and the public will have an opportunity to make submissions on the project.

4.0 Description of the Proposed Development

This EIS seeks approval for the following development at 26-42 Eden Street and 161-179 Princes Highway, Arncliffe (the Eden Street site):

- Demolition of all existing buildings and structures on the site;
- Site preparation works, excavation and tree removal;
- The construction of a mixed-use development comprising:
 - 744 apartments across (4) buildings between 19-23 storeys in height, as follows:
 - 186 market housing apartments in Building A;
 - 202 market housing apartments in Building B;
 - 180 social housing apartments in Building C; and
 - 176 market housing apartments in Building D;
 - 3,113m² retail gross floor area;
 - 240m² for a future childcare centre;
 - 3,706m² of communal open space;
 - 813 spaces of lower ground and basement car parking; and
- 4,870m² of publicly accessible open space including a 4,000m² park, an 870m² public plaza (meeting space), and through site link connecting Eden Street and the Princes Highway.

This chapter provides a detailed description of the proposed development. It has been informed by the Architectural Plans (**Appendix A**) and Urban Design Report (**Appendix B**) prepared by Group GSA, and other supporting technical documentation appended to the report. The built form of the proposed development is the result of an extensive urban design process by the applicant and Group GSA that responds to the unique development opportunities and surrounding context the Eden Street site possesses. An artist's impression of the proposed development is shown in **Figure 16** below.



Figure 16 Artist's impression of the proposed development, viewed from the Princes Highway

Source: Group GSA

4.1 Numerical Overview

A numerical summary of the key parameters proposed development is provided in **Table 5**.

Table 5 Key development information

Component	Proposal
Site area	13,440.3m ²
GFA	Residential: 61,160m ² (62,985m ² including wintergardens) Retail: 3,113m ² Childcare: 240m ² Total: 64,513m ² (66,338m ² including wintergardens)
FSR	4.80:1 (4.94:1 including wintergardens – refer to Section 5.3.2 below)
Maximum height	Building A: RL 95.05m Building B: RL 98.25m Building C: RL 89.65m Building D: RL 91.2m
Maximum height (storeys)	Building A: 22 storeys (including lower and upper ground floors) Building B: 23 storeys Building C: 19 storeys Building D: 22 storeys
Apartments	Building A: 186 Building B: 202 Building C: 180 (social housing) Building D: 176 Total: 744
Apartment mix	Studio: 9 (1.2%) 1 bedroom: 323 (43.4%) 2 bedroom: 262, including 3x 2 bedroom townhouses (35.2%) 3 bedroom: 150 (20.2%)
Vehicular parking	Residential: 654 Visitor: 75 Retail: 78 Childcare: 6 Total: 813 car spaces Motorcycle: 67 spaces Bicycle: 392 spaces
Communal (residents') open space	3,706m ²
Publicly accessible open space	Eden Street park: 4,000m ² Public plaza (meeting space): 870m ² Total: 4,870m ²

4.2 Demolition and Site Preparation Works

It is proposed to demolish all existing structures and buildings on site to facilitate the proposed development. In addition to this all existing vegetation will be removed from the site in accordance with the Arborist Report at **Appendix J**.

It is then proposed to undertake all necessary site preparation works, including excavation and bulk earthworks, to accommodate the proposed development. Demolition and site preparation details will be finalised once a detailed construction methodology is prepared for the project prior to construction.

4.3 Apartment Typology, Tenure and GFA Breakdown

The proposed development provides 744 apartments across four towers, in accordance with the apartment and GFA breakdown provided in **Table 6** below¹.

Table 6 Apartment and GFA breakdown

Apartment type	Building A	Building B	Building C	Building D	Total
GFA breakdown					
Retail	3,113m ² across site				3,113m²
Childcare	N/A			240m ²	240m²
Residential	17,411m ²	17,503m ²	11,999m ²	14,247m ²	61,160m²
Apartment typology breakdown					
Tenure type	Market housing	Market housing	Social housing	Market housing	N/A
Studio	0	0	9	0	9
1 bedroom	46	73	100	104	323
2 bedroom	68	98	63	33 ²	262
3 bedroom	72	31	8	39	150
Total	186	202	180	176	744

4.4 Social Housing Arrangements

The apartments in Building C comprise social housing, while apartments in Buildings A, B and D comprise market housing. There are 180 social housing and 564 market residential apartments in total proposed at the site. The social housing apartments, and Building C in general, have been designed to achieve 'tenure blindness' whereby the building's tenure is not perceptible from the public domain and all four buildings read as one holistic and highly integrated precinct. Building C shares its podium with Building D (refer to **Section 4.6.3**).

The social housing dwellings will be owned, operated, and managed by Evolve Housing, an accredited Community Housing Provider (CHP) and one of Australia's largest CHPs. Evolve Housing will be responsible for the maintenance and repairs of Building C, and will facilitate some community activities, and administer some social services for its residents.

Social housing residents will be former residents of the site, who generally have a right to return to the site once it is redeveloped, and/or applicants on the Department of Families and Community Services Housing Pathways register. The existing units at the site were previously occupied by long term social housing tenants, who have already been relocated to enable the redevelopment of the site. Relocated tenants were asked by the Department of Communities and Justice (DCJ) on whether they wish to return to the new social housing units following redevelopment, with 108 expressing interest.

The units are currently being used as temporary accommodation for tenants whose housing security has been affected by COVID-19. There are currently 139 households living on-site. All residents will need to be relocated in late 2022 to enable redevelopment, with transition planning already commenced. Evolve has dedicated staff on site for next two years to support households in preparation for relocating. If current households in the temporary program identify they have a preference to remain in Arncliffe (i.e. – children now attending school in Arncliffe) they will have the opportunity to be allocated into the new site once developed.

4.5 Site Access and Servicing

All vehicular movements are proposed via Eden Street. The vehicular entrance and exit to the retail and residential carpark are provided at the southern end of the site, adjacent of which is the loading dock and servicing area, incorporating both retail and residential loading docks, with these access arrangements shown in **Figure 17**.

¹ As consistent with the Architectural Plans, the apartments within the podiums have been assigned to the most relevant building, generally on the basis of what building circulation core they are accessed from. The three walk-up apartments with access from Eden Street Park have been assigned to Building D.

² Including the 3x walk-up two bedroom townhouses.

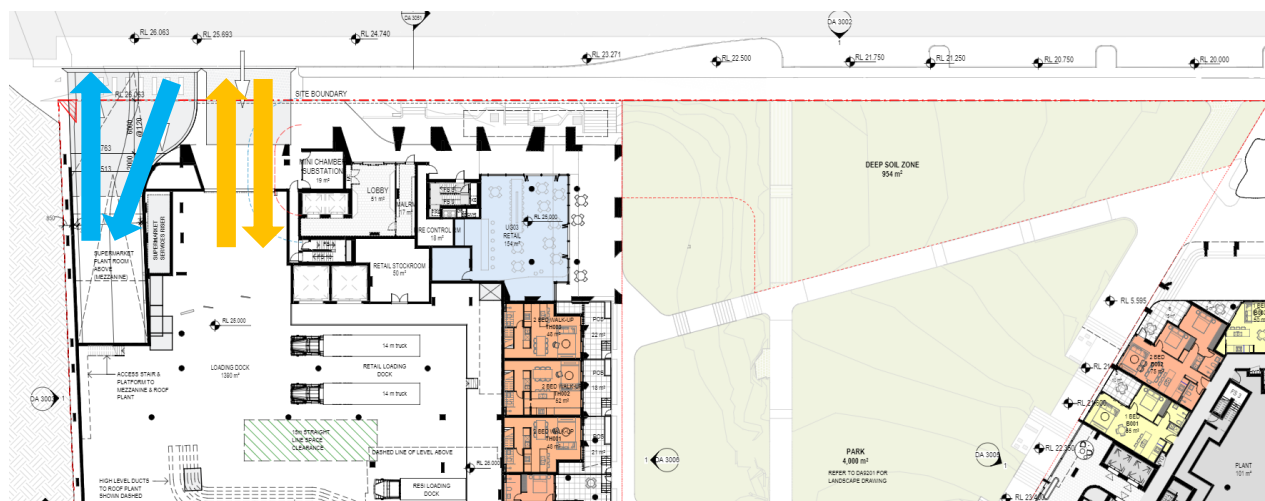


Figure 17 Parking (blue arrows) and loading/servicing (orange arrows) vehicular access arrangements

Source: Group GSA, additional edits Ethos Urban

Pedestrian access will continue to be provided from the Princes Highway and Eden Street. As shown on the Architectural Plans, the Building A lobby entrance is provided from the Princes Highway at the northern end of the site, and the Building B lobby is provided from Eden Street Park. The Building C lobby entrance is provided from Eden Street, and the Building D entrance is provided adjacent to the childcare centre near the Princes Highway.

4.6 Built Form and Urban Design

The built form of the proposed development comprises a shared 3 storey basement for vehicular parking, above which the development is separated into two distinct building precincts: Buildings A and B at the northern end of the site (the 'North Precinct'), and Buildings C and D at the southern end (the 'South Precinct'). The Precincts are separated by a large 4,000m² new publicly accessible open space (Eden Street Park) as shown in **Figure 18**. The built form of each Precinct comprises a distinct podium with a two tower built form above.

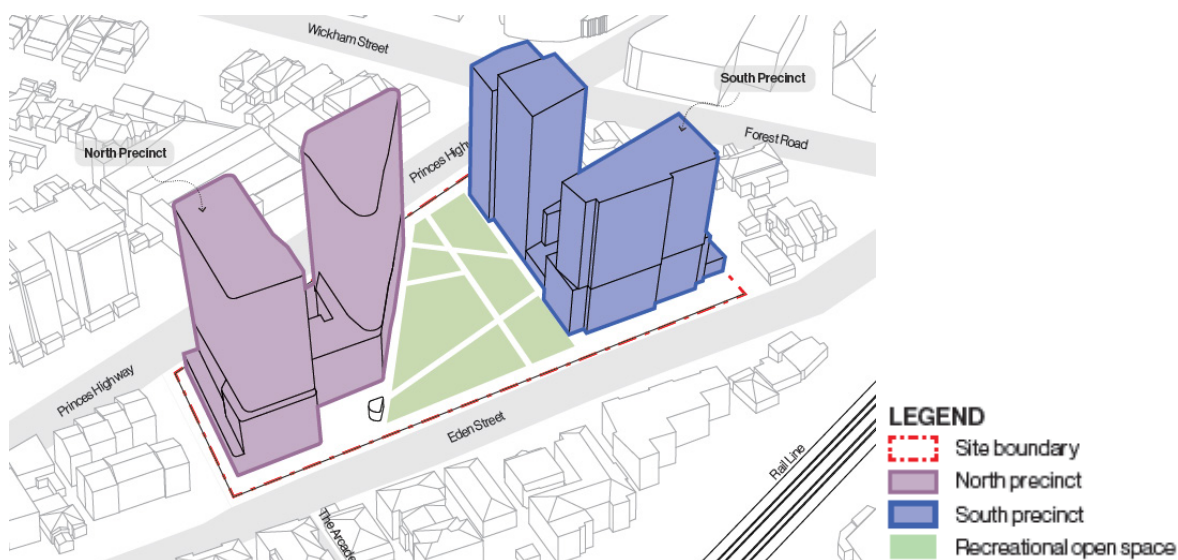


Figure 18 The development is divided into two precincts separated by Eden Street Park

Source: Group GSA

The built form is shown in detail in the Architectural Plans prepared by Group GSA at **Appendix A**, with further discussion provided below. The podiums accommodate mixed-uses, comprising both retail tenancies, floorspace for a childcare centre and residential apartments. The towers accommodate residential apartments.

Owing to the sloping topography of the site, as described in **Section 2.5** above, the buildings have both a lower ground and an upper ground level. The upper ground level provides street level pedestrian access for the Princes Highway frontage of the site, as well as the southern end of the Eden Street frontage. However, owing to the northern end of the Eden Street boundary being the lowest point on the site, street level access at that location is instead provided via the lower ground level (through the Public Meeting Place, see **Section 4.7.2** below).

4.6.1 Shared Basement Levels

The proposed development comprises three basement levels shared between all four buildings. The basement envelope generally sits below the entirety of the site except for the Eden Street Park's deep soil zone. 238 residential parking spaces are provided in level B1, 268 spaces in level B2, and 223 spaces in level B3, for a total of 729 residential spaces (including 75 visitor spaces). An additional 67 motorcycle parking spaces and 392 bicycle spaces, in addition to building servicing and plant uses are also accommodated within the basement.

Access between the basement levels is provided through internal vehicular ramps within the carpark, with the entrance provided from Eden Street as discussed in **Section 4.5** above (via the lower ground level retail parking area). Pedestrian access to the basement is provided from all four building circulation cores in addition to two escalators from the Public Meeting Space (further described in **Section 4.7.2**). An excerpt from the Architectural Plans of the layout of Level B1 is provided in **Figure 19** below.



Figure 19 Basement level 1 proposed layout

Source: Group GSA

4.6.2 North Precinct

The North Precinct comprises two residential towers (Buildings A and B) above a 7 storey mixed-use podium. The ground floors contain a number of retail spaces that will introduce street level activation and vibrancy to the Eden Street Precinct. The architecture of the North Precinct is characterised by a number of public open spaces, including a retail precinct on the lower ground floor, a new Public Meeting Place (including retail kiosk), additional public spaces for movement, and a consistent street wall to the new Eden Street Park. Further detailing on the design principles and evolution of the Precinct is presented in the Urban Design Report at **Appendix B**.

Lower Ground Level

The lower ground level of the North Precinct podium provides a public plaza 'Public Meeting Place' at its frontage to Eden Street, including associated retail kiosk (further discussed at **Section 4.7.2** below). This directly links to a covered retail precinct with tenancies connected through interconnected retail arcades, introducing a fine grain character to the site. The retail area comprises a number of smaller tenancies envisaged as food and beverage (such as cafes) and/or speciality/boutique retail stores, as well as a larger 500m² tenancy below Eden Street Park that is capable of accommodating a neighbourhood supermarket.

Access is also provided from the Pacific Highway frontage of the site to the retail precinct via a set of escalators known as the 'Moving Place' (**Section 4.7.3**). Escalators also provide access from the Public Meeting Place to the below ground carpark. An excerpt from the Architectural Plans showing the North Precinct lower ground floor plan is provided in **Figure 20** below.



Figure 20 North Precinct lower ground floor plan, with Meeting Place and retail precinct

Source: Group GSA

Upper Ground Level

The upper ground level of the North Precinct provides two additional retail tenancies at the Princes Highway frontage to introduce activity to what is currently an uninviting area for pedestrians, with the Building A lobby entrance in between. This space is known as the 'Connecting Place' and is further described in **Section 4.7.3**. As aforementioned, an open area at the south western end of the Precinct contains an open air escalator providing access to the retail tenancies below (the 'Moving Place'; **Section 4.7.3**). An excerpt from the Architectural Plans showing the North Precinct upper ground floor plan is provided in **Figure 21** below.

Pedestrian entrances to the residential buildings are also provided at this level; the Building A lobby entrance is provided off the Princes Highway and the Building B lobby is provided from Eden Street Park. A communal residents' open space is also provided within the built form. To ensure that a high standard of passive surveillance is provided to the public domain, and to prevent the appearance of blank facades, continuous residential apartments have been provided facing Eden Street Park, the Public Meeting Place below, and surrounding through site links.



Figure 21 North Precinct upper ground level floor plan

Source: Group GSA

Upper Podium Levels

The upper podium levels of the North Precinct comprise residential apartments, between levels 1-6 (inclusive). A typical floor plan (level 5 pictured) is provided in **Figure 22** below. Access to the podium apartments is provided through the building circulation cores of Buildings A and B. On level 7 atop the podium, a large landscaped communal open space area for residents has been provided in between the tower built forms.



Figure 22 North Precinct podium upper levels floor plan

Source: Group GSA

Residential Towers

Residential apartments are provided within the residential towers, between levels 7-20 inclusive (Building A) and levels 7-21 inclusive (Building B). Additional landscaped communal rooftop gardens have been provided at level 21 (Building A) and level 22 (Building B) on top of the towers to provide further amenity and opportunities for respite for residents.

A typical floor plan of North Precinct residential towers is provided in **Figure 23** below (levels 13-15 shown).

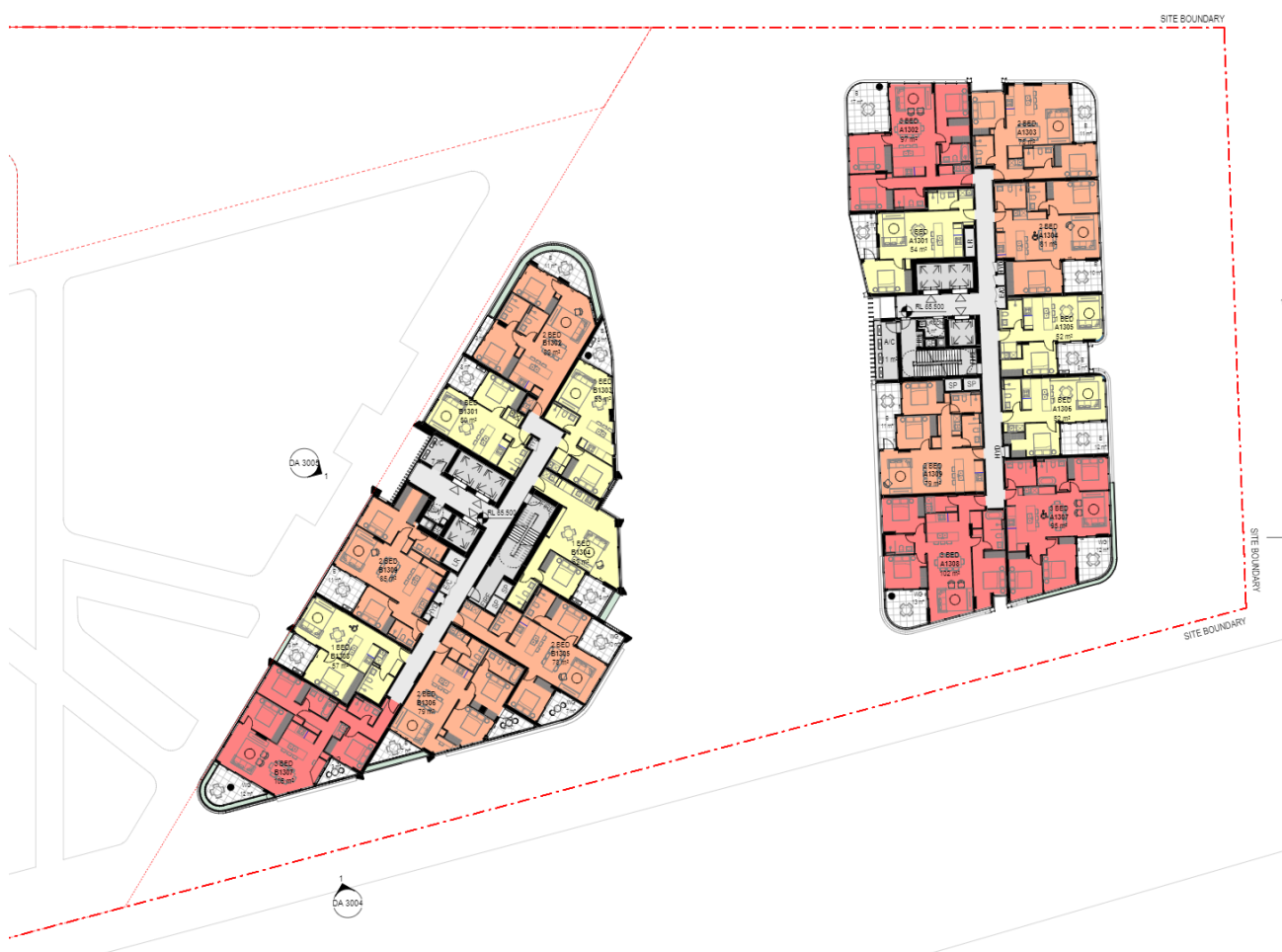


Figure 23 Typical North Precinct towers (Buildings A and B) floorplan

Source: Group GSA

4.6.3 South Precinct

The South Precinct comprises Buildings C and D, located above a two-storey shared podium (although the towers themselves maintain distinctive podium built forms until level 6). This introduces a more varied approach to the built form. The South Precinct podium accommodates the site's retail parking, the shared loading and servicing dock, complimented by additional retail tenancies and residential apartments. Further detail on the design principles and evolution of the Precinct is presented in the Urban Design Report at **Appendix B**.

Lower Ground Level

Due to the sloping nature of the site as discussed in **Section 2.5**, the South Precinct lower ground level is located entirely below ground. The lower ground level of the South Precinct podium comprises 84 vehicular parking spaces for the retail tenancies of the site (including 6 spaces for the childcare centre), comprising 72 spaces for customers and 12 spaces for staff.

The retail parking area also accommodates through traffic travelling between the carpark entrance on the upper ground floor and the residential basement parking below, with a roller shutter provided at the entrance to the basement levels for residential security. The North Precinct lower ground floor plan is provided in **Figure 24**.

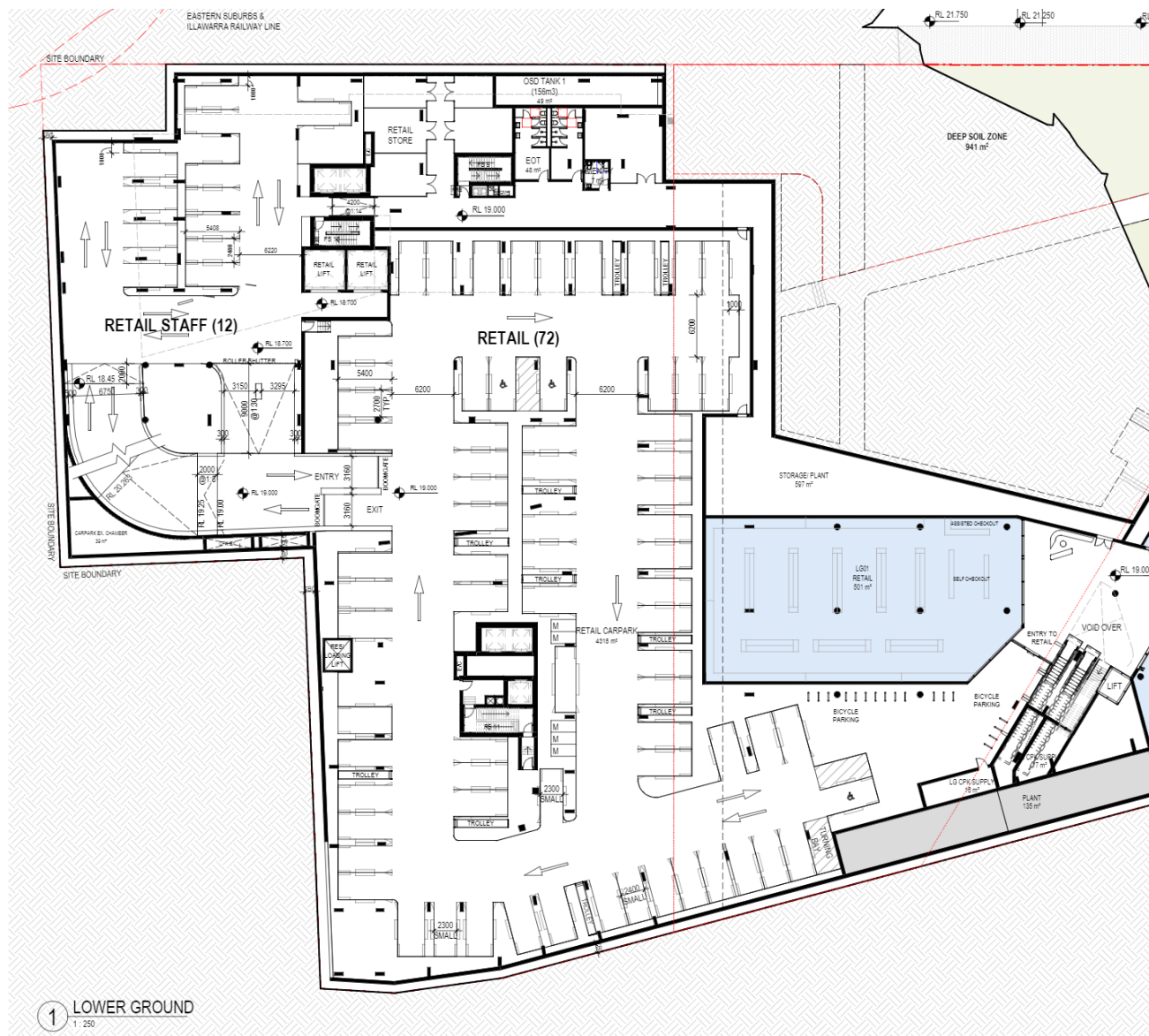


Figure 24 South Precinct lower ground level floor plan, with retail parking

Source: Group GSA

Upper Ground Level

The upper ground level of the South Precinct podium comprises the shared retail and residential loading docks for the site, accessed from Eden Street adjacent to the carpark entrance. To enable additional activation towards the street frontages, an additional retail tenancy has been provided below Building C facing Eden Street, and a 240m² childcare centre tenancy is provided below Building D facing the Princes Highway. The tenancy is capable of accommodating up to 40 children.

As with the retail tenancies, consent is sought for the childcare use and tenancy shell only. The fitout and operation of the childcare centre will be subject to a future approval. Nevertheless, the space has been designed for compliance with the relevant regulations and operational requirements.

Ground level apartments face the continuous Eden Street Park frontage providing additional passive surveillance, including three 2-storey, walk-up townhouses. The residential building lobbies are also located at this level, the Building C entrance being provided from Eden Street and the Building D entrance adjacent to the childcare centre, near the Princes Highway. The South Precinct lower ground floor plan is shown in **Figure 25** below.

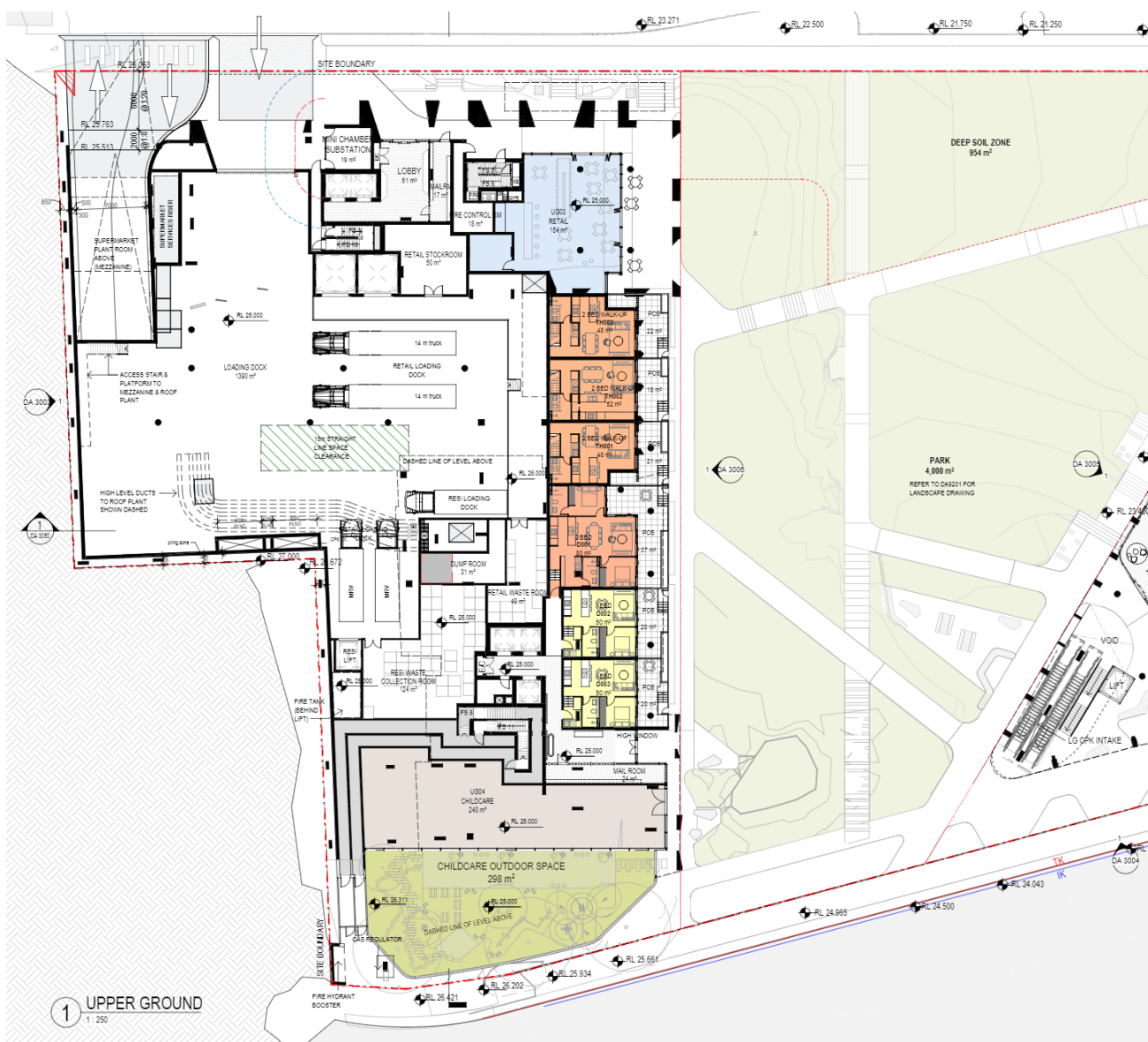


Figure 25 South Precinct upper ground level floor plan

Source: Group GSA

Upper Podium Levels

Level 1 of the South Precinct podium comprises the second level of the 2-storey walk-up townhouses, a void to the loading dock below, residential apartments at its southern end along the Princes Highway frontage, and a landscaped communal open space near the southern boundary. More apartments and a larger shared communal open space is provided atop the podium at level 2, as shown in the Architectural Plans excerpt at **Figure 26**.

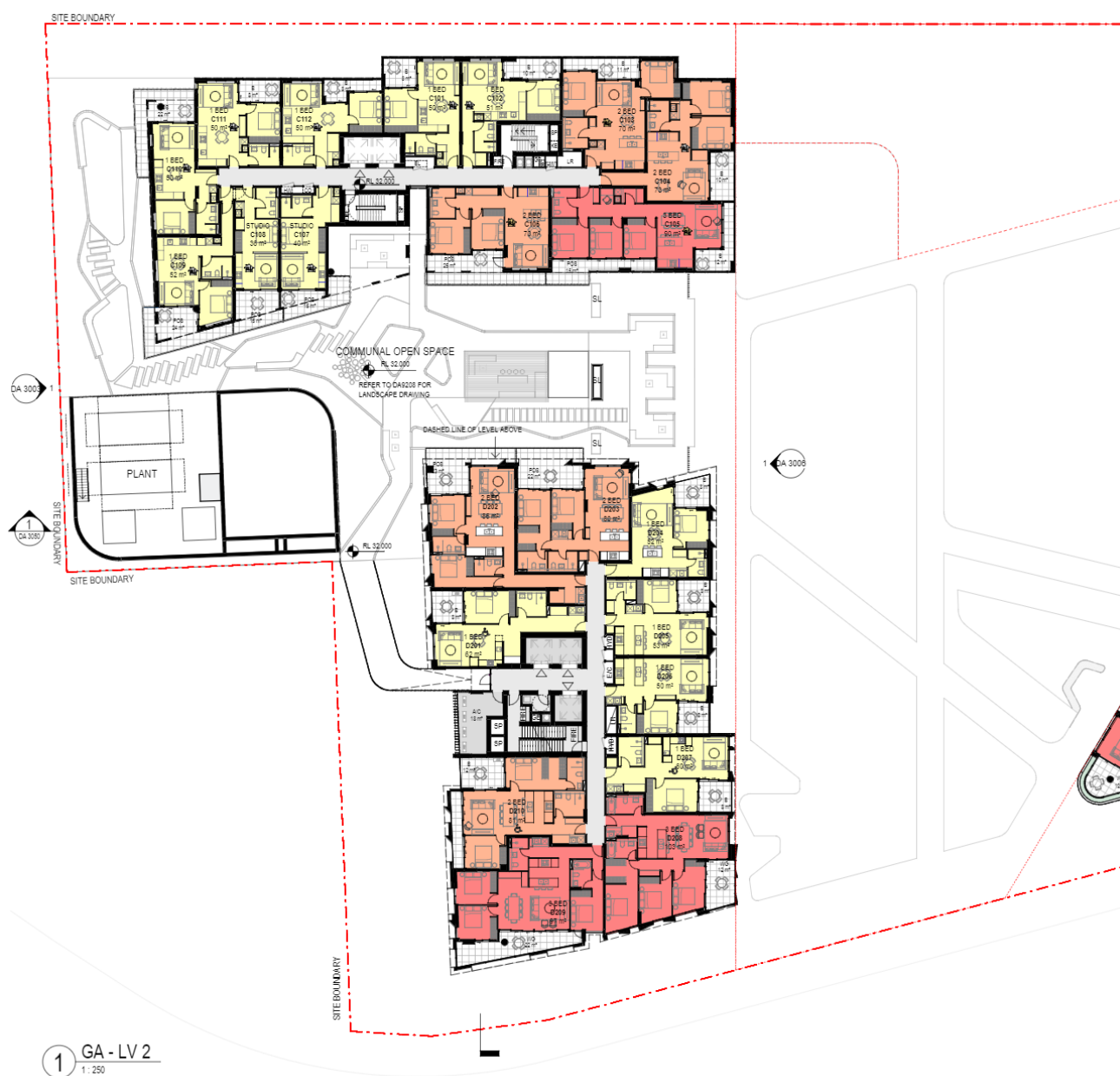


Figure 26 South Precinct level 2 podium floorplan

Source: Group GSA

Residential Towers

Apartments are provided within the residential towers, between levels 2-18 inclusive (Building C) and levels 2-20 inclusive (Building D), although for visual consistency with the North Precinct, the towers maintain their podium facades until level 6 (see **Figures 27 – 28**). Like the North Precinct, rooftop gardens have been provided on the rooftop of Building C, and level 19 of Building D for resident amenity.



Figure 27 South Precinct tower floorplan – typical levels 2-6 (level 5 pictured)

Source: Group GSA

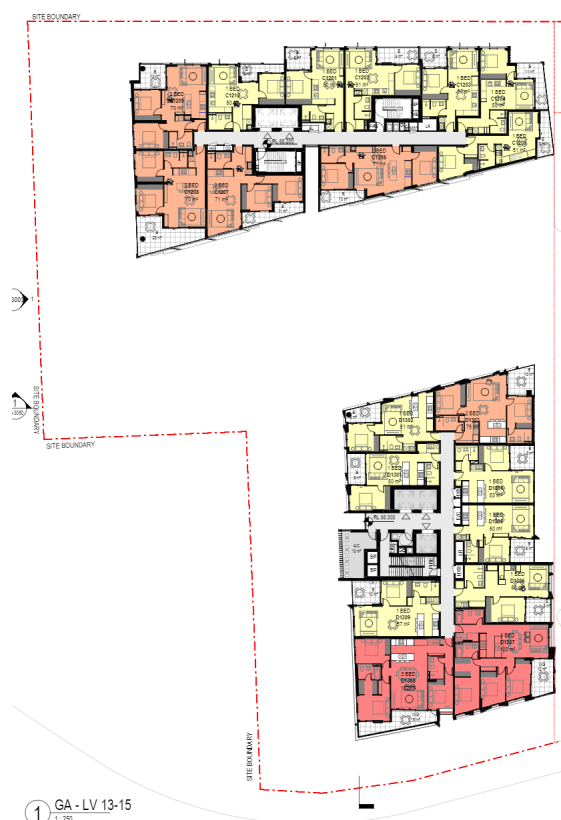


Figure 28 South Precinct tower floorplan – typical levels 6+ (levels 13-15 pictured)

Source: Group GSA

4.6.4 Communal Open Space

As discussed above, a number of communal open spaces are proposed, adding up to a total of 3,706m². These spaces are intended for access by residents only. Their locations are provided within the Communal Open Space Plan (DA-4200; **Figure 29**) at **Appendix A** – comprising:

- Upper ground level of the North Precinct podium;
- Level 1 of the South Precinct podium;
- Level 2 above the South Precinct podium;
- Level 7 above the North Precinct podium;
- Level 18 (rooftop) above Building C;
- Level 19 of Building D;
- Level 21 (rooftop) above Building A; and
- Level 22 (rooftop) above Building B.

Landscaping for the spaces will be undertaken in accordance with the Landscape Plans prepared by Group GSA at **Appendix I**, incorporating a diverse vegetative palette that maximises usage of native vegetation, as further discussed in **Section 4.8** below.

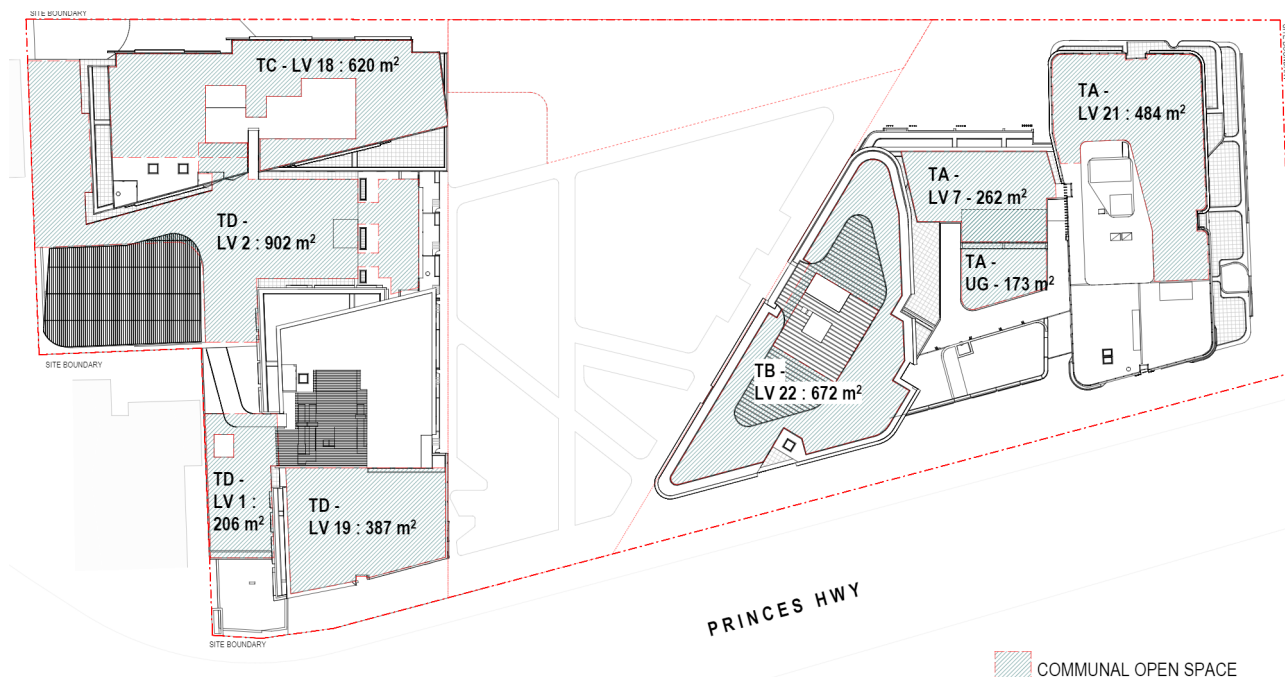


Figure 29 Communal open space across the site

Source: Group GSA

4.7 Publicly Accessible Open Spaces

In addition to the communal residents' open spaces, the proposed development also includes a number of diverse high quality open spaces accessible to the general public, in line with Council's vision for the site. This public benefit offering includes the following:

- A 4,000m² new park, Eden Street Park, incorporating a 'Discovery Play' area and a variety of lawns bisecting the North and South Precincts;
- A 870m² new 'Public Meeting Space' located in the North Precinct along the Eden Street frontage of the site;
- Two new spaces for movement, the 'Connecting Place' and 'Moving Place', along the North Precinct Princes Highway frontage; and
- A series of through site links, through Eden Street Park and along the site's northern boundary.

The design of these spaces is elaborated within the Urban Design Report prepared by Group GSA at **Appendix B**, and further summarised below.

4.7.1 Eden Street Park

A 4,000m² new public open park known as Eden Street Park will be provided at the site, in line with Arncliffe and Banksia DCP requirements (**Section 5.4**). This park is to provide a clearly defined publicly accessible open space for the enjoyment of residents, the Arncliffe local community, and visitors alike. The park provides a number of distinct, yet interconnected elements intersected by pedestrian pathways and through-site links, including a children's Discovery Play area, tree shaded lawn (deep soil area), central sloping lawn and terraced lawns, as shown in **Figure 30**.

The Discovery Play area is located at the southern side of Eden Street Park and is intended for inclusive play for all ages, abilities, and cultures, and includes installations such as a children's climb and lookout, slide, swings, and tunnel and scramble area. The lawn areas provide opportunities for more passive respite, including for informal recreation and gatherings of both future residents and visitors. Seating areas are located along the lawns. The design of the Eden Street Park is further discussed in the Urban Design Report by Group GSA at **Appendix B**.

Vegetation and tree planting in the park will be plentiful and undertaken in accordance with the Landscape Plans prepared by Group GSA at **Appendix I**, incorporating a diverse palette of native and deciduous flora.



Figure 30 Eden Street Park, incorporating the Discovery Play area (red outline), deep soil tree shaded lawn (blue), central sloping lawn (green) and sloping lawns (purple)

Source: Group GSA, edits by Ethos Urban

4.7.2 Publicly Accessible Meeting Space

A multipurpose public plaza, known as the 'Public Meeting Space' (**Figures 31 – 32**) is proposed at the entrance to the lower ground retail area, fronted by the North Precinct podium, Eden Street Park, and the Eden Street frontage. The space has been designed to facilitate movement between the retail precinct and the many public open spaces at the site, and to provide a central meeting point for the Eden Street community that is vibrant and highly activated, including areas to eat, sit, dwell, play and socialise.

To introduce further activation, the centre of the space incorporates an interactive water feature, as well as a retail kiosk and alfresco area, as further discussed in the Urban Design Report at **Appendix B**.

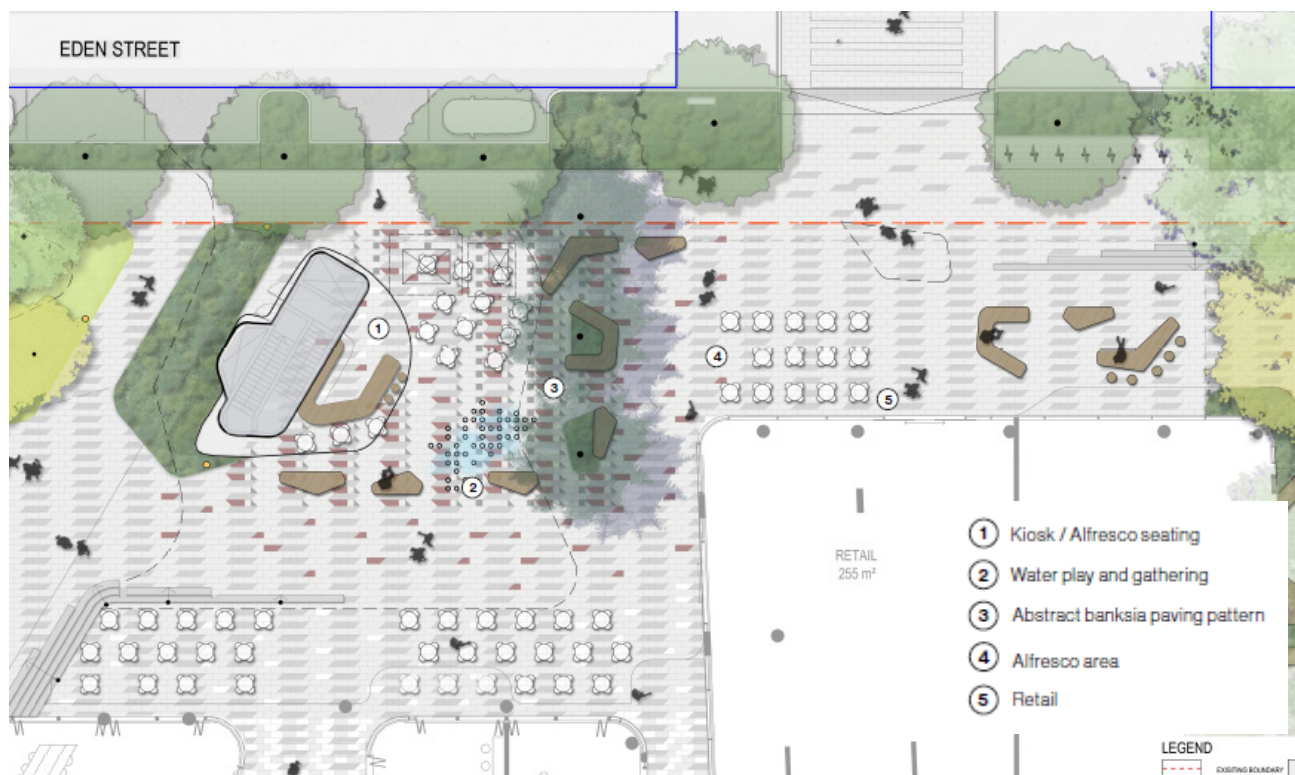


Figure 31 Proposed public meeting space design

Source: Group GSA



Figure 32 Artist's impression of the public meeting space

Source: Group GSA

4.7.3 Other Public Spaces

The proposed development provides a further two additional distinct public open spaces: the 'Connecting Place', and the 'Moving Place' (**Figure 33**). The 'Connecting Place' is located within the North Precinct at the entrance to the Building A lobby, flanked by retail tenancies. It has been designed to emphasise the connectivity of uses within the Eden Street precinct and incorporates amphitheatre seating steps and a group gathering deck that addresses the public domain, additionally interfacing with the through-site link at the northern boundary of the site (**Figure 34**).

The 'Moving Place' is located at the south western end of the North Precinct. It includes a set of open air escalators providing access to the lower ground retail area from the Pacific Highway frontage of the site. The 'Moving Place' introduces further vibrancy to the currently poorly activated Pacific Highway frontage and incorporates additional public seating (Figure 35).



Figure 33 Location of the 'Connecting Place' (blue rectangle) and 'Moving Place' (red) within the North Precinct

Source: Group GSA



Figure 34 'Connecting Place'

Source: Group GSA



Figure 35 'Moving Place'

Source: Group GSA

4.7.4 Publicly Accessible Through Site Links

A series of through-site links have been included in the proposed development to significantly improve site permeability through safe and highly legible connections, connecting the Princes Highway to Arncliffe railway station via the new Eden Street precinct and the existing Arcade north of Eden Street (Figure 36). This includes a number of links through the Eden Street Park, as well as a new landscaped link at the northern boundary of the site, as further delineated within the Urban Design Report.

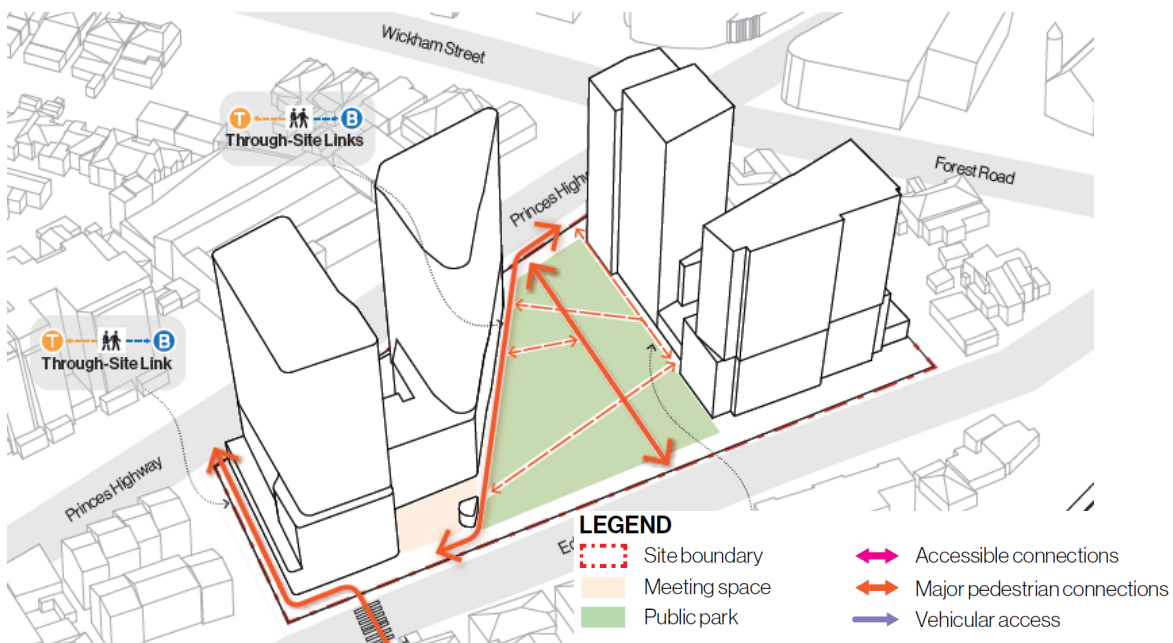


Figure 36 Proposed through site links and pedestrian connections

Source: Group GSA

4.8 Landscaping

Landscaping and planting at the site, including for all residents' communal open spaces, publicly accessible open spaces, and streetscapes will be undertaken in accordance with the Landscape Plans prepared by Group GSA at **Appendix I**, an excerpt of which is provided in **Figure 37** below. Further discussion of landscaping initiatives is also provided in the Urban Design Report at **Appendix B**.



Figure 37 Upper ground street level landscaping plan

Source: Group GSA

The development will result in a net increase in vegetation at the site compared to current site conditions. A comprehensive vegetative palette is proposed that incorporates a variety of native and deciduous species, including the Sandstone Woodland and Eastern Suburbs Banksia Scrub planting palettes, that emphasises connection to country and the integration of ecology with the urban built environment. The exact species to be used is provided within the Urban Design Report at **Appendix B**.

Vegetation is to be primarily sourced from locally sourced seed and grown material. The Discovery Play area will include a demonstration productive garden comprising Indigenous food plants, enabling greater understanding of place and country for site visitors.

Extensive tree and vegetative cover will increase shade and help mitigate the urban heat island effect. Eden Street Park also includes a 941m² deep soil area at its frontage to Eden Street (refer to drawing DA-4300) comprising 7% of the site area, in line with ADG requirements.

4.9 Utilities and Infrastructure

Consent is sought to connect the proposed development to the relevant utilities infrastructure, including sewer drainage, potable water, gas services, and high and low voltage electrical infrastructure to enable its operation. Where necessary, extensions and amplifications to existing infrastructure may be required, as discussed in the Infrastructure Management Plan prepared by JHA Services at **Appendix AA** and **Section 5.26** below.

4.10 Public Domain Upgrades

To accommodate the proposed development and to provide for enhanced movement of pedestrians and vehicles the applicant has committed towards the delivery of the following public domain works subject to further consultation and collaboration with Council and other relevant agencies:

- Construction of a raised, marked pedestrian crossing across Eden Street directly adjacent to The Arcade, facilitating safe and efficient connectivity between the Princes Highway, the site and Arncliffe railway station; and
- The provision of a painted 'seagull' treatment within Eden Street accommodating dedicated right turn entry and exit lanes associated with the passenger vehicle access driveway.

As these works will be delivered on Council-owned land not owned by the applicant, the final design will be subject to the approval and consent of Council and any other relevant agencies. It is considered that the delivery of these works can be enforced through standard conditions of consent.

Furthermore, section 7.11 (formerly section 94) contributions to be paid by the proposed development will help fund the following additional public domain works as identified under the *Arncliffe and Banksia Local Infrastructure Contributions Plan 2020*:

- The provision of a dual lane bicycle lane within Eden Street along the eastern kerb alignment, between Forest Road and Burrows Street;
- The provision of a shared pedestrian / cycle path along the western Princes Highway footway, between Forest Road and Burrows Street; and
- If found to be necessary, the modification of the existing pedestrian refuge within Eden Street at Forest Road to prohibit right turn movements to and from Eden Street.

5.0 Assessment of Environmental Impacts

This section of the EIS assesses and responds to the environmental impacts of the proposed development. It addresses the matters for consideration as set out in the issued SEARs at **Appendix C**. The Mitigation Measures at **Section 6** complement the findings of this section.

5.1 Strategic Plans and Guidelines

The proposed development is consistent with the relevant regional and local strategic planning documentation, as assessed in **Table 7** below.

Table 7 Assessment against strategic planning documentation

Name of plan	Commentary
<i>Greater Sydney Region Plan</i>	<p>The <i>Greater Sydney Region Plan – A Metropolis of Three Cities</i> (GSRP) is the current strategic plan for the Greater Sydney metropolitan area. The proposed development exhibits a high degree of consistency with the relevant planning objectives of the GSRP, as it will:</p> <ul style="list-style-type: none"> • Provide additional employment-generating floorspace (retail and childcare) and key new publicly accessible open space, including the 4,000m² Eden Street Park, to support the Arncliffe community as it continues to grow, in accordance with Objective 6 – ‘Services and infrastructure meet communities’ changing needs’; • Improve opportunities for community events, community interaction and overall health and wellbeing through the delivery of a new retail precinct and significant publicly accessible open space, as consistent with Objective 7 that ‘Communities are healthy, resilient and socially connected’; • Provide a significant amount of diverse and high quality housing (including social housing) at a key LAHC site, as identified under Figure 15 of Objective 10 – ‘Greater housing supply’; • Help alleviate housing unaffordability through the provision of 180 new social housing dwellings within Building C, in accordance with Objective 11 for ‘Housing to be more diverse and affordable’; • Support the creation of a true mixed-use precinct adjacent to Arncliffe Station for not only site residents but also the entire Arncliffe community, in line with Objective 12 to create ‘Great places that bring people together’; • Co-locate employment floorspace and new dwellings adjacent to Arncliffe Station, thereby reducing the time required for residents to travel for their day-to-day activities in line with Objective 14 where ‘Integrated land use and transport creates walkable and 30-minute cities’; and • Provide a landmark development that will catalyse the ongoing growth of the Bayside West Precincts (Arncliffe, Banksia, and Cooks Cove), a key Growth Area under Figure 17 of the GSRP.
<i>Eastern City District Plan</i>	<p><i>Our Greater Sydney 2056 – Eastern City District Plan</i> (ECDP) details a range of opportunities, priorities, and actions specific to the Eastern Harbour City that assists and facilitates the implementation of the GSRP’s vision. The Eden Street site is identified as a key project under Planning Priority E2 (Working through collaboration) of the ECDP. The proposed development is also broadly consistent with the ECDP’s Planning Priorities, as it will:</p> <ul style="list-style-type: none"> • Provide additional employment-generating floorspace (retail and childcare) and key new publicly accessible open space, including the 4,000m² Eden Street Park, to support the Arncliffe community as it continues to grow, in accordance with Planning Priority E3 – ‘Providing services and social infrastructure to meet people’s changing needs’; • Improve opportunities for community events, community interaction and overall health and wellbeing through the delivery of a new retail precinct and significant community open space, as consistent with Planning Priority E4 for ‘Fostering healthy, creative, culturally rich, and socially connected communities’; • Deliver significant housing growth in an appropriate location with strong access to jobs and public transport, on the Arncliffe Communities Plus site listed under page 39 of Planning Priority E5 – ‘Providing housing supply, choice and affordability, with access to jobs, services and public transport’; • Support the renewal of Arncliffe into a “great place” and important local centre through the delivery of a truly mixed-use precinct, in line with Planning Priority E6 – ‘Creating and renewing great places and local centres, and respecting the District’s heritage’; • Support the creation of true mixed-use precinct servicing not only its residents but also the wider Arncliffe community, in line with Planning Priority E6 in ‘Creating and renewing great places and local centres, and respecting the District’s heritage’; and

Name of plan	Commentary
	<ul style="list-style-type: none"> Co-locate employment floorspace and new dwellings adjacent to Arncliffe Station, thereby reducing the length required for residents to travel for their day-to-day activities in line with Planning Priority E10 – ‘Delivering integrated land use and transport planning and a 30-minute city’.
<i>Bayside Local Strategic Planning Statement</i>	<p><i>Future Bayside: Local Strategic Planning Statement</i> (LSPS) is the primary planning document for the Bayside LGA, defining the long-term vision for land use and infrastructure provision in the LGA and giving guidance to its future character.</p> <p>Arncliffe is identified for urban growth under the document’s structure plan, with the proposed development to further catalyse the suburb’s ongoing uplift and renewal on a key opportunity site. Furthermore, the LSPS notes that Arncliffe and Banksia are to accommodate a significant amount of the future housing planned within the LGA (3,500 new dwellings by 2036). In this regard, the development will deliver 744 apartments across four towers, including 180 new social housing dwellings, providing a large contribution towards the meeting of this target.</p> <p>The proposed development is consistent with the 24 ‘Bayside Planning Priorities’ of the LSPS, as it will:</p> <ul style="list-style-type: none"> Provide high quality publicly accessible spaces, including a new retail precinct, a 870m² public meeting space, and 4,000m² new publicly accessible park, and through site links, thereby aligning with Bayside Planning Priority 5 - ‘Foster healthy, creative, culturally rich and socially connected communities’; Provide new dwellings at a key opportunity site immediately adjacent to high frequency public transport connections, thereby aligning land use with transport planning in accordance with Bayside Planning Priority 6 to ‘Support sustainable housing growth by concentrating high density urban growth close to centres and public transport corridors’; Deliver a diverse range of studio, 1 bedroom, 2 bedroom and 3 bedroom apartments (refer to Section 4.3), helping meet Bayside Planning Priority 7 to ‘Provide choice in housing to meet the needs of the community’; Provide 180 new social housing apartments to meet the needs of those unable to access housing on the private market, in line with Bayside Planning Priority 8 to ‘Provide housing that is affordable’; Provide robust public space and urban design outcomes in accordance with the planning provisions, that respects the existing character of Arncliffe through high quality and activated publicly accessible open space, in accordance with Bayside Planning Priority 9 to ‘Manage and enhance the distinctive character of the LGA through good quality urban design, respect for existing character and enhancement of the public realm’; Co-locate employment floorspace and dwellings adjacent to Arncliffe Station, thereby reducing the length required for residents to travel for their day-to-day activities in line with Bayside Planning Priority 12 for ‘Delivering an integrated land use and a 30-minute city’; and Provide retail and childcare floorspace that meets the needs of Arncliffe’s growing population, aligning with Bayside Planning Priority 15 for ‘Growing investment, business opportunities and jobs in Bayside’s strategic centres and centres’.
<i>Bayside West Precincts 2036</i>	<p>The <i>Bayside West Precincts 2036 Plan</i> (2036 Plan) was prepared by the DPIE to guide the transformation of the Bayside West Precincts (Arncliffe, Banksia, and Cooks Cove). Under the 2036 Plan, the site is identified for ‘High density housing with mixed use opportunities’ (refer to Figure 1 above). The proposed development is entirely consistent with the 2036 Plan.</p> <p>Under the 2036 Plan, the Eden Street site is identified for the delivery of new social and affordable housing (page 16), and to provide for a new public park (page 23). In this regard, the proposed development responds to both these outcomes by providing 180 new diverse and high quality social housing dwellings in Building C, and providing a 4,000m² publicly accessible park (Eden Street Park) at the centre of the site.</p> <p>The 2036 Plan also identifies the need for “Expansion of the Arncliffe and Banksia centres to allow for increased commercial activity around these transport hubs”. The proposed development provides 3,353m² of retail and childcare floorspace to meet the needs of the growing Arncliffe community and transform the Eden Street site into an active centre which will enhance the vibrancy and liveability of the town centre. The precinct and new publicly accessible open space will attract surrounding residents, thereby further allowing it to “become vibrant and active and provide for the growing community” (page 18).</p> <p>The proposed development is entirely consistent with the desired future character of Arncliffe outlined in the <i>Bayside West Precincts 2036 Plan</i>.</p>

5.2 State Environmental Planning Instruments

An assessment of the proposed development against the relevant State-level Environmental Planning Instruments (EPIs) is provided below.

5.2.1 Environmental Planning & Assessment Act 1979

The *Environmental Planning & Assessment Act 1979* (EP&A Act) establishes a specific assessment system to consider projects classed as State Significant Development (SSD). SSD is development deemed to be of State significance and includes for example projects of a certain value that are being completed on sites regarded as important to the NSW Government. As noted, the proposed development that is the subject of this DA is categorised as SSD, as further discussed in **Section 5.2.2** below.

Table 8 provides an assessment of the proposed development against the objects of the EP&A Act.

Table 8 Objects of the EP&A Act

Object	Comment
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,	<p>The proposal has the potential to provide a range of social and economic benefits, including the provision of much-needed high quality social housing, and retail floorspace catalysing the development of the Arncliffe Planned Precinct. Social impact is further discussed in Section 5.14.</p> <p>The proposal will be monitored through the delivery and operational period, to ensure that it does not result in any adverse environmental impacts. This is detailed further in the Mitigation Measures in Section 7 of the EIS.</p>
(b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,	The principles of Ecologically Sustainable Development, as set out in Schedule 2 of the EP&A Regulation, as well as other relevant economic, environmental, and social considerations have been addressed in this EIS at Section 5.18.1 .
(c) to promote the orderly and economic use and development of land,	The proposal provides for the orderly and economic development of the site generally in accordance with established planning parameters, facilitating the delivery of a new, high-quality mixed-use development.
(d) to promote the delivery and maintenance of affordable housing,	The proposed development will provide 180 new social housing dwellings in Building C, hence significantly improving the quantity and quality of social housing in NSW in accordance with the principles of the 'Communities Plus' initiative.
(e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,	The site is not considered to have habitat suitable for any threatened flora and fauna, as was confirmed in the Biodiversity Development Assessment Report Waiver at Appendix V . This waiver considered the values of the site and confirmed that a Biodiversity Development Assessment Report is not required.
(f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),	A Heritage Impact Statement is provided at Appendix O and an Aboriginal Cultural Heritage Assessment Report (ACHAR) is provided at Appendix S . Refer to Section 5.11 and 5.12 .
(g) to promote good design and amenity of the built environment,	The design of the proposed development has been subject to an extensive and ongoing SDRP process as further outlined in Section 3.3 above.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The proposed development will achieve the highest standards in construction and maintenance.
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	Consultation has been undertaken with various levels of government and government agencies during the preparation of this SSD DA as outlined in Section 3 .
(j) to provide increased opportunity for community participation in environmental planning and assessment.	<p>Community consultation and participation to date has informed, and will continue to assist, the development and operation of the proposed development. This is detailed in Section 3 of the EIS.</p> <p>Further consultation will be carried out during exhibition of the application, through the design development process, prior to the commencement of construction, and throughout the construction period.</p>

As required by Clause 7(1)(d)(v) of Schedule 2 of the EP&A Regulation, the following additional approvals set out in **Table 9** are either not required by virtue of the fact that the project is SSD, or because they are not required in order to permit the proposed development to occur.

Table 9 Other Legislation

Act	Approval Applicable/ Required
Approvals that do not apply to State Significant Development	
<i>Coastal Protection Act 1979</i>	N/A
<i>Fisheries Management Act 1994</i>	N/A
<i>Heritage Act 1977</i>	N/A
<i>National Parks and Wildlife Act 1974</i>	N/A
<i>Native Vegetation Act 2003</i>	N/A
<i>Rural Fires Act 1997</i>	N/A
<i>Water Management Act 2000</i>	Yes
Legislation that must be applied consistently	
<i>Fisheries Management Act 1994</i>	No
<i>Mine Subsidence Compensation Act 1961</i>	No
<i>Mining Act 1992</i>	No
<i>Petroleum (Onshore) Act 1991</i>	No
<i>Protection of the Environment Operations Act 1997</i>	No
<i>Roads Act 1993</i>	No
<i>Pipelines Act 1967</i>	No

5.2.2 State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (State and Regional Development) 2011 (SEPP SRD) identifies development that is State Significant Development (SSD). Clause 8(b) of the SEPP identifies that development is SSD for the purposes of the EP&A Act if it is specified in Schedule 1 or 2 of the SEPP. Clause 10 'Development at NSW Land and Housing Corporation Sites' of Schedule 2 of the SEPP specifies that:

- (1) *Development on land identified as a NSW Land and Housing Corporation Site on the State Significant Development Sites Map [is SSD] if the development—*
 - (a) *is carried out by or on behalf of the NSW Land and Housing Corporation, and*
 - (b) *has a capital investment value of more than \$30 million.*

The proposal is SSD as it is located on the Eden Street site (**Figure 38**) within the SEPP, is being carried out on behalf of the NSW Land and Housing Corporation as part of the 'Communities Plus' programme and has a capital investment value (CIV) of more than \$30 million, as the Quantity Surveyor's Report at **Appendix D** confirms the proposed development has a CIV of \$253,350,091 (\$253 million).



Figure 38 The Eden Street site as identified under the SRD SEPP

Source: SRD SEPP

5.2.3 State Environmental Planning Policy (Affordable Rental Housing) 2011

State Environmental Planning Policy (Affordable Rental Housing) 2011 (SEPP ARH) applies to development for the purposes of affordable housing. Clause 6(2) of SEPP ARH states the following:

- (2) *In this Policy, residential development is taken to be for the purposes of affordable housing if the development is on land owned by the Land and Housing Corporation.*

Therefore, as the Eden Street site is owned by LAHC, it is considered that 100% of the residential floorspace of the site is affordable housing, within the context of SEPP ARH.

Under clause 13 of SEPP ARH, development used for the purposes of affordable housing is eligible for bonus floorspace. As the site has an existing FSR limit (under the RLEP 2011) that is greater than 2.5:1, and more than 50% of the floorspace of the site is to be used for affordable housing (under the definition established under clause 6(2) earlier), clause 13(2)(b)(i) applies, which states the following:

- (2) *The maximum floor space ratio for development to which this Division applies is the existing maximum floor space ratio for any form of residential accommodation permitted on the land on which the development is to occur, plus—*
- (b) *if the existing maximum floor space ratio is greater than 2.5:1—*
- (i) *20 per cent of the existing maximum floor space ratio—if the percentage of the gross floor area of the development that is used for affordable housing is 50 per cent or higher*

The site has a maximum FSR of 4:1 under clause 4.4 of the LEP. Therefore, a maximum FSR of 4.8:1 is permissible with consent by virtue of clause 13(2)(b)(i). The proposal includes a request to vary the maximum FSR by 2.8% under clause 4.6 of the LEP to accommodate wintergardens in specific locations to mitigate traffic noise from the Princes Highway. The clause 4.6 variation request is provided at **Appendix M** and discussed further at **Section 5.3.2** below.

5.2.4 Other State EPIs

An assessment of the proposed development against the relevant additional State level EPIs is provided in **Table 10** below.

Table 10 Assessment against additional SEPPs

SEPP	Commentary
<i>State Environmental Planning Policy No 55 – Remediation of Land</i> (SEPP 55)	A Detailed Site Investigation (DSI) has been provided at Appendix R , confirming that the site is suitable for the proposed development. This issue is further discussed in Section 5.20 below.
<i>State Environmental Planning Policy No 65 – Design Quality of Residential Apartment Development</i> (SEPP 65)	The proposed development is consistent with SEPP 65 and its accompanying Apartment Design Guide (ADG). Detailed assessment of the proposed development against the ADG is provided at Section 5.9 below.
<i>State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004</i> (SEPP BASIX)	A BASIX Certificate for the proposed development has been prepared by Integreco and is attached at Appendix DD .
<i>State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017</i> (SEPP Education)	Consent is sought for the childcare use and tenancy shell only, with the fitout and operation of the centre to be sought as part of a future approval. The tenancy has been designed to be capable of compliance with the relevant policies and guidelines.
<i>State Environmental Planning Policy (Infrastructure) 2007</i> (SEPP Infrastructure)	<p>Clauses 101, 102 and 104 of SEPP Infrastructure apply to the proposed development as it is traffic-generating development fronting a classified road (the Princes Highway). Hence, Consultation and the concurrence of Transport for NSW (TfNSW) is required.</p> <p>Traffic impacts are further discussed in the Traffic and Parking Impact Assessment at Appendix N and Section 5.10, demonstrating that the proposed development will not generate adverse traffic impacts, including on the Princes Highway.</p> <p>A Noise and Vibration Assessment is provided at Appendix P. It concludes that wintergardens are required in specific locations on the Princes Highway frontage to enable certain apartments to achieve the required LAeq levels.</p>
<i>Biodiversity Conservation Act 2016</i>	The DPIE issued a BDAR waiver on 16 February 2021 (refer to Appendix V), as further discussed in Section 5.23 below.

5.3 Rockdale Local Environmental Plan 2011

The *Rockdale Local Environmental Plan 2011* (RLEP 2011) is the site's principal environmental planning instrument. An assessment against the relevant clauses of the RLEP 2011 is provided in **Table 11** below.

Table 11 Assessment against RLEP 2011

Clause	Control	Commentary
2.1 – Land use zones	B4 Mixed Use	<p>Residential accommodation and retail premises are permissible with consent in the B4 zone.</p> <p>The proposed mixed use residential development adjacent to Arncliffe Station is entirely consistent with the zone objectives to integrate retail and residential uses in accessible locations to maximise public transport patronage and encourage walking and cycling.</p>
4.3 – Height of building	70m	Buildings C and D comply with the maximum height limit. The maximum height of Building A is 74.3 metres, and the maximum height of Building is 74.85 metres. The variations are proposed to enable the provision of safe, high quality roof top communal open space and mechanical plant. No habitable floor space is located above the 70 metre height limit. A Clause 4.6 request to vary the development standard is provided at Appendix L .
4.4 – Floor space ratio	4:1 (4.8:1 including SEPP ARH bonus)	The proposed FSR is 4.94:1. The proposed variation is a direct result of providing wintergardens in lieu of open balconies for specific apartments facing the Princes Highway. The wintergardens are required to reduce the noise impacts from the Princes Highway. The proposal would comply with the maximum FSR of 4.8:1 if the wintergardens were not required. A Clause 4.6 request to vary the development standard is provided at Appendix M .
5.10 – Heritage conservation	N/A	No heritage items are located on the site and the site is not located within a Heritage Conservation Area. However, two local heritage items (dwellings) are located on the western side of Eden Street opposite the site. A Heritage Impact Statement (HIS) is attached at Appendix O . The HIS confirms that the proposed development will not result in adverse heritage impacts. This issue is further discussed in Section 5.12 below.

Clause	Control	Commentary
6.11 – Active street frontages	The Princes Highway boundary of the site is identified as an Active street frontage under the Active Street Frontages Map of the RLEP 2011.	As shown on the Architectural Plans at Appendix A , retail tenancies and a childcare centre is proposed along the entire length of the Princes Highway podium frontages. Hence, the proposed development is compliant with this control.
6.14 – Design excellence	In accordance with subclause 6.14(6) an architectural design competition was waived by the NSW Government Architect (refer to Appendix GG). The applicant and Group GSA have met with the NSWGA Design Review Panel on three occasions prior to the lodgement of the SSDA. The design has been developed in response to the DRP feedback and exhibits design excellence as outlined in Section 3.3 and in further detail in the Urban Design Report (Appendix B). The DRP meeting notes are provided at Appendix HH and discussed at Section 3.3 above.	It is understood that the DRP will review the design during the assessment period and appropriate conditions of consent will be included to maintain design integrity post determination.

5.4 Rockdale Development Control Plan 2011

It is noted that SSD applications are treated differently to regular 'local' and 'regional' developments, with a range of other legislation not applying (Section 4.41 and 4.46 of the EP&A Act) and other legislation needing to be applied consistently with the terms of any SSD consent (Section 4.42 of the EP&A Act). Accordingly, in this instance Development Control Plans are specifically excluded from being applicable to SSD applications per Clause 11 of the *State Environmental Planning Policy (State and Regional Development) 2011*.

Notwithstanding, Section 7.7 of the RDCP 2011 outlines site-specific controls and an indicative built form study (**Figure 39**) for the Eden Street site, as well as precinct-specific controls for Arncliffe and Banksia. The proposal has been designed with reference to the site-specific development controls and an assessment is provided at **Table 12** below.



Figure 39 DCP indicative built form study for the Eden Street site

Source: Rockdale City Council (now Bayside Council)

Table 12 Assessment against RDCP 2011 site-specific controls for Arncliffe Town Centre

Control	Commentary
Desired future Neighbourhood character	
Provide a vibrant mixed use Town Centre, extending along the east side of the rail line, with activity during the day and night.	The proposal will contribute to an ongoing vibrant mixed-use centre by providing retail, childcare and residential floorspace, a 870m ² public accessible outdoor meeting space, and a new 4,000m ² publicly accessible park and through-site link at the centre of the site.
Eden Street and Burrows Street become retail streets, complementing Firth Street and extending the Town Centre uses and activity to the east of the rail line. Streetscape improvements delivered alongside development will further enhance the character and amenity of these streets.	The proposed development will incorporate ground floor retail uses along Eden Street.
Existing and new pedestrian links improve access to the railway station and create a more walkable centre.	The proposed development will significantly improve pedestrian connectivity and permeability between the Railway Station and the Princes Highway through the delivery of a new through-site links.
Eden Street Park is a new local park catering to new residents with a centrally located lawn, gardens and significant tree planting.	The proposed development will provide a new multipurpose 4,000m ² public accessible park as discussed in Section 4.7.1 .
Taller buildings near the station visually reinforce the area as a centre and assist in highlighting the location of key connections and open spaces.	The proposed development is four tall buildings adjacent to the station.
Land use	
Ensure retail and business uses are provided at the ground level of existing and planned retail streets particularly on Eden Street and Burrows Street and sites adjoining Wooroona Reserve to the east.	Commercial (retail and childcare) uses are provided at ground level along Eden Street and the Princes Highway.
Development adjoining Princes Highway and parts of Eden Street should provide showroom and other commercial uses at lower levels.	
High-quality residential development is encouraged above retail and commercial uses within the town centre, and as a standalone use on sites outside of the centre.	Residential apartments designed to achieve the Apartment Design Guide design criteria are proposed above the ground floor.
Built form	
Tall towers on larger sites should be slender and well proportioned.	The proposed towers are considered to be slender and well proportioned, with the envelopes established under the DCP built form study as a basis.
Provision of high quality residential amenity in terms of privacy and built form by complying with SEPP 65 - Design Quality of Residential Apartment Development and Apartment Design Guide.	The proposed residential towers will comply with SEPP 65 and its accompanying Apartment Design Guide, providing a high level of residential amenity. Assessment against the ADG is provided in Section 5.9 below.
Side setbacks are to include deep soil zones and appropriate landscaped treatment.	As shown in the Urban Design Report at Appendix B , 7% (941m ²) of the site area is deep soil zone in accordance with the Apartment Design Guide. Landscaping elements are integrated throughout the development at ground, podium, and roof levels.
A front setback of 3 metre is required, unless a specific setback is recommended in 4.1 Building Setback of this chapter.	As shown in the Building Separation Diagrams provided within the Architectural Plans at Appendix A , the proposed development will provide a minimum setback 3 metres or more to Eden Street, and a 6 metre setback to the Princes Highway.
Public domain	
6 metre setback and provision of a positive covenant applying to this setback, for the purposes of permitting unrestricted access for public thoroughfare, landscape and public domain maintenance on sites adjoining the Princes Highway. Where a site has more than one frontage, this requirement shall apply to each street frontage. Proposed landscape improvements include significant 'boulevard tree planting and the creation of a	As shown in the Building Separation Diagrams provided within the Architectural Plans at Appendix A , the proposed development will provide a 6 metre setback to the Princes Highway. Significant landscaping improvements are also proposed (refer to the Landscape Plans – Appendix I).

Control	Commentary
dual footpath that allows for the staged delivery of the setback and continued pedestrian access during transition.	
A new park to be delivered through the redevelopment of the Housing NSW site on Eden Street.	The proposed development will deliver a new high quality, activated 4,000m ² publicly accessible park.
New through site links between Princes Highway and Eden Street.	The proposed development provides well-proportioned and legible through site links along the northern boundary and through the publicly accessible park. The proposal will significantly improve pedestrian connectivity and permeability between the Princes Highway and Eden Street.
Site specific controls – Eden Street Development Site, Arncliffe Town Centre	
Ensure the new public park is to be located to maximise solar access;	The development has been designed to that the park will have excellent solar access throughout the year. Overshadowing impacts are further discussed in Section 5.6 below.
Provide a minimum width of 50m along the Eden Street frontage with a site area of 4000m ² ;	The proposed park is 4,000m ² and has a width of 70 metres along Eden Street.
Ensure direct through site links are incorporated within the new park and integrate with the new space into the surrounding streetscape;	The park includes through site links between Eden Street and the Pacific Highway.
Ensure new through site links will be provided in accordance with the diagrams on pages 7 106 and 7 107	As shown in the Urban Design Report at Appendix B , the new through site links will be provided generally in accordance with Council's diagrams.
Provide pathway connections through the public park connecting Princes Highway to Eden Street and Arncliffe Station	The park includes through site links between Eden Street and the Pacific Highway.
Ensure a generous landscape interface to Princes Highway with existing trees, additional tree planting, garden zones that must incorporate storm water treatment gardens	As shown in the Urban Design Report, the Princes Highway (and Eden Street) interfaces will feature generous and extensive site landscaping works.
Provide landscape setbacks as per "Figure 7.7.13 Public Domain and Open Space Network Diagram" on page 7 87	Landscape setbacks are proposed consistent with the diagram.
Ensure the new park will play a key role in the community providing new landscaping and areas for passive and active recreation activities	The new park will be the central focus of the new Eden Street community and has been designed to accommodate passive and active recreation.
Ensure building setbacks and site through links are in accordance with "Figure 7.7.42 Built Form and Character" on page 7 109 and through site links as shown on page 7 106 and 7 107	The proposal complies with the building setbacks to the Princes Highway and provides a through site link in accordance with the DCP.
The configuration of buildings and structures must ensure that a minimum of 50% of the area of parks and green spaces receive a minimum of 3 hours during lunch hours (12pm - 2pm) on 21 June (mid winter)	As demonstrated within the Overshadowing Diagrams (DA-4201, DA-4202 and DA-4204) provided within the Architectural Plans at Appendix A , more than 50% of the communal and publicly accessible open space will receive a minimum of 3 hours during lunch hours midwinter.
Promote slender buildings, towers exceeding 8 storeys should have maximum floor plates of 800m ² gross floor area	The proposed towers are slender in nature. All towers have a maximum floor plate of less than 800m ² .

5.5 Built Form

The general built form parameters of the proposed development have been established by the development standards in the RLEP 2011 and the site-specific indicative built form study and setback controls in the RDCP (refer **Figure 39** above) and ADG. The proposed development generally falls within the indicative built form envelope as demonstrated in the RDCP assessment at **Table 12** above and the ADG assessment at **Table 13** below.

Minor variations are proposed to the height of Building A and Building B; and wintergardens are proposed in certain locations on the Princes Highway frontage which results in a minor variation to the maximum permissible gross floor area. These variations are appropriate in the circumstances and are addressed at **Appendix L** and **Appendix M**.

The proposal adjusts the RDCP built form configuration to improve solar access, increase views and reduces overshadowing to the surrounding area. The proposed built form maintains complies with the key RDCP and ADG separation and setback controls as illustrated by **Figure 40**.

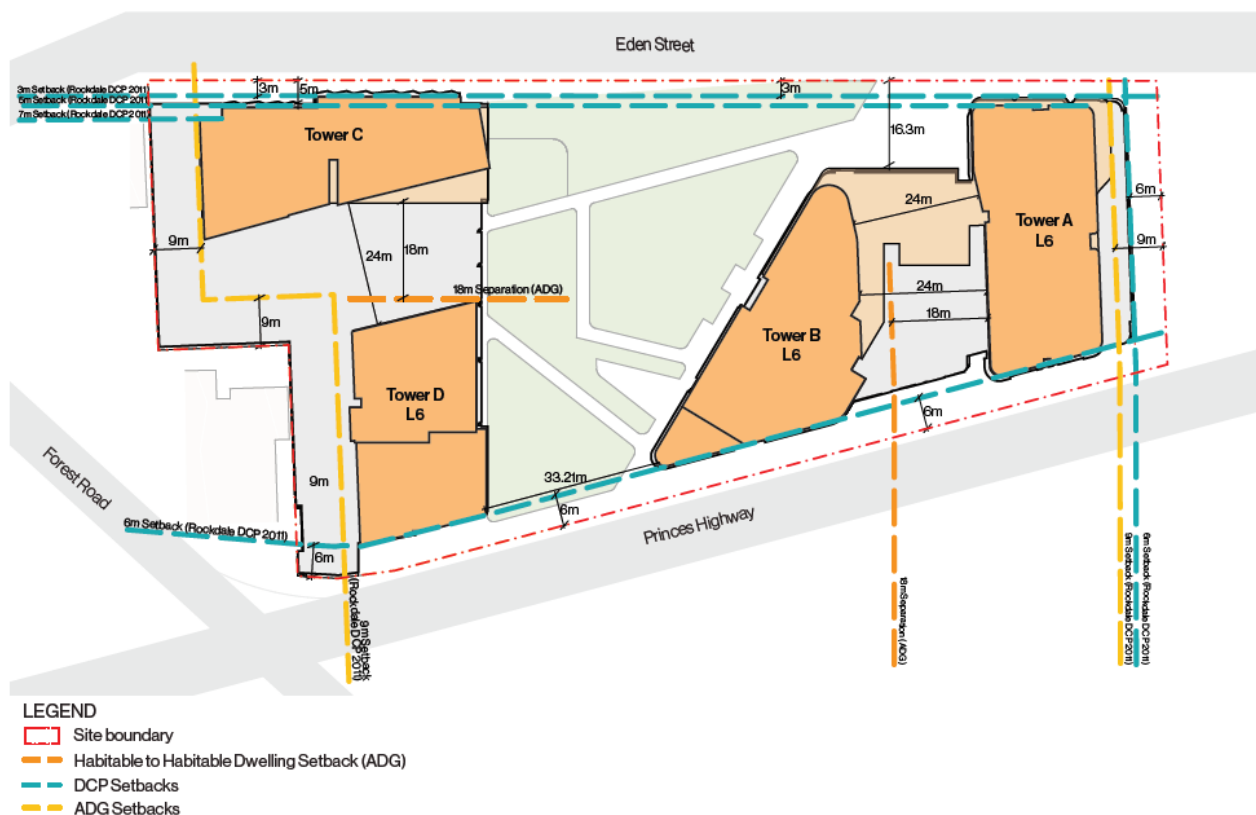


Figure 40 Built form compliance diagram

Source: Group GSA

5.6 Overshadowing and Solar Access

Overshadowing Diagrams have been provided within the Architectural Plans at **Appendix A**. Existing overshadowing impacts from the current built form on the site are shown in drawings DA-4560 through DA-4583 of the Architectural Plans. Overshadowing impacts of the proposed development onto the surrounding environment and are shown in drawings DA-4550 – DA-4559 and include a comparison of the proposed development against the DCP indicative built form study.

The Overshadowing Diagrams demonstrate that overshadowing generated by the proposed development is not unreasonable, and consistent with the DCP study.

5.6.1 Overshadowing of Surrounding Residential Buildings

The towers have been designed so that shadows cast are slender and fast-moving throughout the day. The Overshadowing Diagrams demonstrate that the proposal will generally maintain 2 hours direct sunlight to the residential dwellings in the surrounding area on June 21 (winter solstice), in accordance with the Rockdale DCP 2011, with the exception of two detached dwellings at 7 Forest Road and 181 Princes Highway.

We note the proposal reduces solar access to 7 Forest Road below 2 hours, however, results in an improved outcome compared to the DCP built form study through enabling direct sunlight to the dwelling between 2pm-3pm. The proposal also reduces solar access to the vacant and derelict 181 Princes Highway property below 2 hours. The Overshadowing Diagrams demonstrate this is consistent with the impacts of the DCP envelope.

The overshadowing impacts of the proposed development are appropriate in the circumstances.

5.6.2 Overshadowing of Existing and Future Open Spaces

The overshadowing analysis demonstrates that the proposal will generally provide greater solar access than the RDCP built form layout to the surrounding open spaces.

Section 7.7 of the Rockdale DCP requires that a minimum of 2 hours sunlight be provided to the school grounds of St Xaviers Primary School and Arncliffe Public School between the hours of 12pm – 2pm. Drawings DA-4550 – DA 4522 confirm that during the winter solstice (hence representing a ‘worst case’ scenario), overshadowing will occur onto the St Xaviers campus only between 9am – 11am. Crucially, past 9am, the extent of this overshadowing onto the school playground will be minimal (**Figure 41**). By 12pm, shadows generated by the development will have departed the St Xaviers site. Owing to its distance from the site, the development will not generate any overshadowing onto Arncliffe Public School.

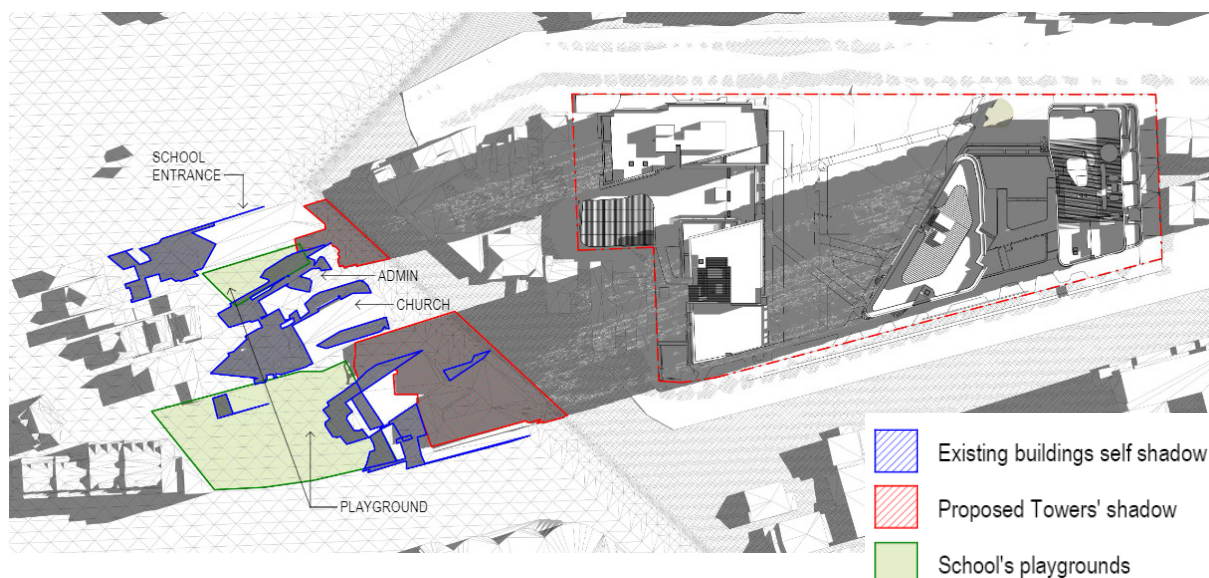


Figure 41 Overshadowing impacts onto St Xaviers Primary School at 10am. Note lack of overshadowing generated by the development (red outline) onto school playgrounds

Source: Group GSA

There are no existing public open spaces in the vicinity that will be impacted by overshadowing from the proposed development. The only significant public open space requiring assessment is the new Eden Street Park. Drawing DA-4204 confirms that the entirety (100%) of Eden Street Park receives a minimum of 2 hours direct sunlight during the winter solstice, with 62% of the park receiving a minimum of 4 hours (excerpt provided in **Figure 42**). 86% of the park is provided with solar access during 12pm-3pm (i.e. lunch hours).

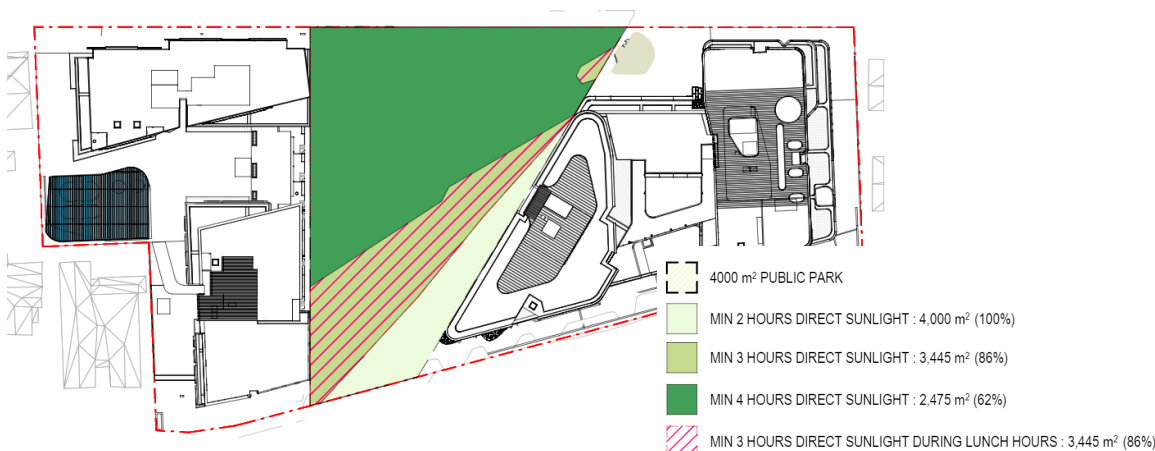


Figure 42 Overshadowing impacts onto Eden Street Park

Source: Group GSA

5.7 Visual Impact

A Visual Impact Assessment (VIA) is provided at **Appendix H**. The VIA considers the visual impacts of the proposed development from the immediate and surrounding area. Photomontages were prepared from six viewpoints:

- Princes Highway (south of the site)
- Princes Highway (north of the site)
- Eden Street
- Arncliffe local centre (Belmore Street)
- Forest Road
- Barden Street

The VIA understandably concludes that the new buildings of scale proposed will result significant visual impacts. However, the VIA considers such impacts to be acceptable for the following reasons:

- The proposal generally complies with the relevant environmental planning instruments, which establishes the intended bulk and scale of the site;
- The proposal results in a built form outcome consistent with the planning intent for the Arncliffe Planned Precinct an emerging node of substantial growth;
- The proposal does not block, occlude, or otherwise adversely impact significant views from the public domain to elements of high scenic value such as Botany Bay, the Cooks River, or the Sydney CBD skyline;
- The large scale Endeavour Apartments (118 Princes Highway; **Figure 15** above) opposite the Princes Highway sets the tone for the emerging visual character of the area, which the proposal is consistent with;
- The proposal includes a number of mitigation measures aimed at reducing the perceived bulk and scale; and
- The proposal is the product of a comprehensive and considered design process.

For these reasons, the VIA concludes that the visual impacts are considered reasonable and acceptable. The VIA also confirms that the

5.8 Airspace Impact

An Airspace Assessment of the proposed development is attached at **Appendix Y**. The report provides an assessment of the impact of the proposed development on airspace operations at and around Sydney Airport. Prescribed airspace around the airport include the Obstacle Limitation Surface (OLS), which permanent and temporary obstructions can penetrate, the Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) surface which temporary structures can penetrate for no more than three months with the support of the airport owner, and the Radar Terrain Clearance Chart (RTCC) surface which no structure can penetrate.

In summary, the Airspace Assessment finds that, for the proposed development:

- The maximum heights of each building and construction cranes will penetrate the Sydney Airport OLS surface;
- The maximum heights of the buildings and cranes remain below the PANS-OPS surface; and
- The maximum heights of the buildings and cranes remain well below the RTCC surface.

Due to the penetration of the OLS surface, an application will be made to the Sydney Airport Corporation Ltd, who will seek the input of the Civil Aviation Safety Authority (CASA) and the building authority to confirm there is no impact on safety or operational efficiency of aircraft activities.

The Aviation Assessment also confirms that as the development site is outside the 20 Aeronautical Noise Exposure Forecast (ANEF) contour, there are no restrictions on the proposed buildings due to aircraft noise.

Thompson GCS conclude that the proposed development will not present a risk to aviation safety or affect surveillance systems and navigation aids located on/within Sydney Airport, and that the development is supportable.

5.9 Residential Amenity

The proposed development is compliant with the relevant provisions of the Apartment Design Guide (ADG), ensuring that a high level of residential amenity is provided to future residents at the site. An assessment of the development's compliance against the ADG is provided in **Table 13** below.

Table 13 Assessment against the Apartment Design Guide

Objectives and Design Criteria			Commentary	Complies?
Part 3 Siting the Development				
3D Communal and Public Open Space				
Communal open space has a minimum area equal to 25% of the site.			The development exceeds the requirements for communal open space (COS): <ul style="list-style-type: none">• Site area = 13,440.3m²• Minimum COS required = 3,360m²• COS provided = 3,706m² (28%) Refer to drawing DA-4200 of Appendix A for details.	✓ Yes
Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid winter).			The development exceeds the minimum requirement of 50% direct sunlight to communal open space. <ul style="list-style-type: none">• COS provided = 3,706m²• 50% of COS = 1,863.5m²• Area achieving 2hrs solar access = 2,131m² (57%) Refer to drawing DA-4201 of Appendix A for details	✓ Yes
3E Deep Soil Zones				
Deep soil zones are to meet the following minimum requirements:			The development provides for 941m ² of deep soil area, meeting the 7% deep soil requirement in the Design Criteria section of the ADG. The entirety of deep soil area is located within Eden Street Park.	✓ Yes
Site Area	Minimum Dimensions	Deep Soil Zone (% of site area)		
Less than 650m ²	-	7%		
650m ² – 1,500m ²	3m			
Greater than 1,500m ²	6m			
Greater than 1,500m ² with significant existing tree cover	6m			
3F Visual Privacy				
Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows:			The design complies with the requirements for building separation for habitable to habitable, habitable to non-habitable and non-habitable to habitable façade conditions. The design has taken care to place windows and balconies in locations that minimise privacy concerns for residents. Refer to DA-4120 through DA-4123 of Appendix A for building separation diagrams.	✓ Yes
Building Height	Habitable rooms and balconies	Non-habitable rooms		
Up to 12m (4 storeys)	6m	3m		
Up to 25m (5-8 storeys)	9m	4.5m		
Over 25m (9+ storeys)	12m	6m		
3K Bicycle and Car Parking				
For development on sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or on land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre, the minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement			The site is located within 800m of Arncliffe station and is zoned B4 Mixed Use. The proposed parking rates strike an appropriate balance between the TfNSW rates and the Rockdale DCP rates; refer to further discussion in Section 5.10 below.	✓ Yes

Objectives and Design Criteria		Commentary	Complies?
prescribed by the relevant council, whichever is less. The car parking needs for a development must be provided off street.			
Part 4 Designing the Buildings			
4A Solar and Daylight access			
Living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid-winter in the Sydney Metropolitan Area and in the Newcastle and Wollongong local government areas.		518 (70%) of the apartments in the building receive a minimum of 2 hours direct sunlight during the required hours. Refer to drawings DA-4450 - DA-4453, and DA-4500 - DA-4501 of Appendix A for compliance diagrams	✓ Yes
A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid-winter.		108 (14%) of units do not receive direct sunlight due to their orientation.	✓ Yes
4B Natural Ventilation			
At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed.		The design has 335 apartments within the first 9 storeys of the development. Of these 335 apartments, 200 (60%) achieve cross ventilation. Refer to DA-4400 and DA-4401 of Appendix A for compliance details. Apartment layouts are generally open plan and minimise corners and corridors that could limit available air flow.	✓ Yes
Overall depth of a cross-over or cross-through apartment does not exceed 18m, measured glass line to glass line.		The maximum depth of through apartments is 13.m (Apt 109 through A509 and B104 through B504).	✓ Yes
4C Ceiling Height			
Measured from finished floor level to finished ceiling level, minimum ceiling heights are:		Residential level floor to floor heights have been set to ensure that the required ceiling heights are achievable. Additional height has been accounted for where a provision for insulation will be required under podium and roof levels (typically levels 5, 6 and top habitable levels) and structural transfers (upper ground level). Where residential apartments are located on upper ground level for Buildings A and D a floor to floor level of 4m has been provided. Refer to DA-3050 of Appendix A for floor to floor heights.	✓ Yes
Minimum ceiling height			
Habitable rooms	2.7m		
Non-habitable	2.4m		
For 2 storey apartments	2.7m for main living area floor 2.4m for second floor, where its area does not exceed 50% of the apartment area		
Attic spaces	1.8m at edge of room with a 30 degree minimum ceiling slope		
If located in mixed use areas	3.3m for ground and first floor to promote future flexibility of use		
These minimums do not preclude higher ceilings if desired.			
4D Apartment Size and Layout			
Apartments are required to have the following minimum internal areas:		All apartments are equal to or greater than the minimum internal areas required. Refer to DA-4000 through DA-4007 of Appendix A for unit mix and area diagrams.	✓ Yes
Apartment Type Minimum internal area			
Studio	35m ²		
1 bedroom	50m ²		
2 bedroom	70m ²		
3 bedroom	90m ²		
The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m ² each.			

Objectives and Design Criteria	Commentary	Complies?															
A fourth bedroom and further additional bedrooms increase the minimum internal area by 12m ² each.																	
Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms.	External glazing to all habitable rooms is greater than the minimum 10% required.	✓ Yes															
Habitable room depths are limited to a maximum of 2.5 x the ceiling height.	All habitable room depths of the proposed development comply with this control.	✓ Yes															
In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window.	All apartments comply with the maximum depths of apartments with open plan living.	✓ Yes															
Master bedrooms have a minimum area of 10m ² and other bedrooms 9m ² (excluding wardrobe space).	Bedrooms and master bedrooms have been designed to be equal to or greater than the minimum sizes required.	✓ Yes															
Bedrooms have a minimum dimension of 3m (excluding wardrobe space).	Generally complies. Where a bedroom has a minimum dimension below 3m in one direction due to façade articulation and non-retainer layouts caused by site constraints, a minimum dimension of 2.9m has been provided in the compromised direction and the size of the bedhead has been increased to compensate and provide for improved amenity.	✓ Generally complies															
Living rooms or combined living/dining rooms have a minimum width of: 3.6m for studio and 1 bedroom apartments 4m for 2 and 3 bedroom apartments.	All living rooms or combined/living dining rooms comply with the minimum width requirements.	✓ Yes															
The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts.	All cross-over and cross-through apartments comply with the minimum width requirements.	✓ Yes															
4E Private Open Space and Balconies																	
All apartments are required to have primary balconies as follows:	All apartments meet the minimum requirements for areas and depths as required. See DA-4100 through DA-4103 for details	✓ Yes															
<table><tr><th>Dwelling Type</th><th>Minimum Area</th><th>Minimum depth</th></tr><tr><td>Studio apartment</td><td>4m²</td><td>-</td></tr><tr><td>1 bedroom apartment</td><td>8m²</td><td>2m</td></tr><tr><td>2 bedroom apartment</td><td>10m²</td><td>2m</td></tr><tr><td>3+ bedroom apartment</td><td>12m²</td><td>2.4m</td></tr></table>			Dwelling Type	Minimum Area	Minimum depth	Studio apartment	4m ²	-	1 bedroom apartment	8m ²	2m	2 bedroom apartment	10m ²	2m	3+ bedroom apartment	12m ²	2.4m
Dwelling Type			Minimum Area	Minimum depth													
Studio apartment			4m ²	-													
1 bedroom apartment			8m ²	2m													
2 bedroom apartment	10m ²	2m															
3+ bedroom apartment	12m ²	2.4m															
The minimum balcony depth to be counted as contributing to the balcony area is 1m.																	
For apartments at ground level or on a podium or similar structure, a private open space is provided instead of a balcony. It must have a minimum area of 15m ² and a minimum depth of 3m.																	
	All ground and podium level apartments have been designed to comply with the minimum depth of 3m and area of 15m ² . Ground level townhouses and apartments to Building D typically exceed these requirements. Public open spaces on podiums have been extended to parapets where possible to maximise areas. Public open spaces on podium levels adjacent to community open spaces have had areas increased to comply and provide for extensive privacy planting.	✓ Yes															
4F Common Circulation and Spaces																	

Objectives and Design Criteria		Commentary	Complies?	
The maximum number of apartments off a circulation core on a single level is eight.		<p>Design guidance for this criteria states that, in instances where it is exceeded, “<i>no more than 12 apartments should be provided off a circulation core on a single level</i>”.</p> <p>No more than 12 apartments are accessed off a single building core on a typical floorplate. All cores have access to natural daylight from the lift lobby, and daylight and ventilation have been provided to all common area corridors.</p>	Complies with design guidance	
For buildings of 10 storeys and over, the maximum number of apartments sharing a single lift is 40.		<p>2 lifts are provided in Building C, and 3 lifts are provided in Buildings A, B and D.</p> <p>It was deemed by the design team that the provision of additional lifts may not provide any significantly greater amenity to occupants, and that the current provision still allowed for wait times that were within acceptable maximum ranges.</p> <p>This allows the cores to remain at an appropriate size, enabling them to be located either centrally to the floorplate or on the southern elevations to maximise the number of apartments per level with access to sunlight.</p>	✓ Yes	
4G Storage				
In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided:		<p>All apartments exceed the ADG minimum requirements for 50% of storage located within the apartment and 50% located in the basements.</p> <p>Refer to DA-4050 through DA-4054 of Appendix A for details.</p>		
Dwelling Type				Minimum Area
Studio apartment	4m ³			
1 bedroom apartment	6m ³			
2 bedroom apartment	8m ³			
3+ bedroom apartment	10m ³			
At least 50% of the required storage is to be located within the apartment.				

5.10 Transport and Traffic Impact

A Traffic and Parking Impact Assessment of the proposed development is attached at **Appendix N**. The document provides an assessment of the potential traffic and parking consequences of the project. The assessment concludes that the proposed site access, parking arrangements, and expected traffic generation and subsequent impact on surrounding intersections are appropriate.

The Traffic and Parking Impact Assessment makes the following conclusions:

- The proposed 564 car spaces and 75 visitor spaces for the market housing (Buildings A, B and D) comply with the minimum rates specified under TfNSW's *Guide to Traffic Generating Developments*.
- The proposed 90 car spaces for the social housing (Building C) complies with the requirements of SEPP ARH.
- The proposed 78 retail parking spaces complies with the requirements of the RDCP 2011.
- The proposed 6 childcare parking spaces comply with the RDCP 2011.
- The proposed 392 bicycle parking spaces and 67 motorcycle spaces comply with the RDCP 2011.
- The proposed development is expected to generate:
 - 289 vehicle movements during the weekday AM peak, including 146 inbound and 143 outbound;
 - 288 trips during the PM peak, including 178 inbound and 110 outbound; and

- and 383 trips during the weekend peak hour, including 191 inbound and 192 outbound.

These trips can be accommodated by the surrounding road network without resulting in noticeable impacts on the performance of any intersection. The performance of the intersection between Forest Road and Eden Street will be significantly improved by the prohibition of right turn movements to and from Eden Street.

- The proposed development will result in a minor increase in levels of pedestrian activity at and around the site, which can comfortably be accommodated by existing pedestrian infrastructure. The proposed through site links will significantly enhance site permeability, resulting in improvements to pedestrian access and mobility.
- The proposed site access arrangements are appropriate, as demonstrated by swept path diagrams for cars and trucks. Internal circulation and manoeuvrability for the carpark and loading dock are appropriate and AS2890 compliant.

The Traffic and Parking Impact Assessment confirms that the proposed development is supportable on traffic and parking grounds.

5.10.1 Construction Traffic Management

The Traffic and Parking Impact Assessment includes a preliminary Construction Traffic Management Plan (CTMP). The preliminary CTMP addresses traffic and access issues associated with demolition and construction works at the site, including traffic management arrangements, ingress and egress of construction traffic, and construction vehicles routes. The preliminary CTMP confirms that movements to and from the site will be minimised during peak hours, and the surrounding road network can comfortably accommodate the expected construction traffic. No unreasonable impacts on pedestrian safety or mobility are anticipated.

The CTMP will be finalised at the Construction Certificate stage. The proposed development is supportable on construction traffic management grounds.

5.11 Indigenous Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by WSP and is attached to this report at **Appendix S**. The ACHAR has been prepared in consultation with the Aboriginal community in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010). The ACHAR documents the process which has been undertaken for consulting, investigation and assessing Aboriginal cultural heritage and Aboriginal archaeology.

5.12 Non-Indigenous Heritage and Archaeology

A Heritage Impact Statement (HIS) is attached at **Appendix O**. The HIS provides an assessment of the impact of the proposed development on the significance of any relevant heritage items. The site itself does not contain any heritage items, nor is it located within a Heritage Conservation Area (HCA). A number of heritage items are located within the vicinity of the site, which are summarised from the report in **Table 14** below. No HCAs are located in the vicinity of the site.

Table 14 Heritage items in the vicinity of the site

Item name	Address	Significance	Item no. ³
Arncliffe Railway Station Group	Arncliffe Railway Station, Station St and road bridge on Forest Rd	State	I1
Glenwood	27 Eden St	Local	I12
The Bard of Avon	39 Eden St	Local	I13
Street plantings	Firth St	Local	I18
Arncliffe Post Office	35 Firth St	Local	I19
St Francis Xavier Church Group	2-6 Forest Rd	Local	I22
Arncliffe Public School and 'Teluba'	168-170 Princes Hwy	Local	I42

³ Item number as identified under Schedule 5 Environmental heritage of the *Rockdale Local Environmental Plan 2011*.

The items directly adjacent to the site are 'Glenwood', a Victorian villa at 27 Eden Street, and 'The Bard of Avon', a two storey late Victorian house at 39 Eden Street. The HIS confirms that the proposed development will not adversely impact the heritage significance or interpretation of these items, and the proposed public domain landscaping works will enhance their setting. The HIS also confirms that the proposed works will not adversely affect the heritage significance of the items further afield.

Attached to the HIS is a Non-Aboriginal Archaeological Assessment prepared by Artefact Heritage. The Archaeological Assessment concludes that "no former structures were identified within the study area", and that there is "no potential that significant archaeological remains are present within the study area".

Hence, the HIS confirms that the proposed development is considered to be acceptable from a heritage perspective.

5.13 Noise and Vibration

A Noise and Vibration Assessment of the proposed development has been prepared by Stantec and is attached to this EIS at **Appendix P**. The report assesses the likely noise and vibration impacts of the proposed development, during its construction and operational phases. The Assessment made the following conclusions:

- The noise impacts associated with the adjacent rail corridor will not exceed the relevant requirements of SEPP Infrastructure for both retail and residential areas. Vibrations due to trains passing will also comply with the relevant human comfort requirements of the SEPP.
- The acoustic impact associated with the Princes Highway is within acceptable limits subject to the implementation of nominated noise mitigation measures, including:
 - Replacing balconies with wintergardens for certain apartments that face the Princes Highway.
 - The installation of glazing to meet the relevant acoustic ratings.
 - Mechanical ventilation to certain apartments.
- With regards to noise impacts associated with the adjacent rail corridor, these are predicted to comply with the relevant requirements under SEPP Infrastructure for both retail and residential areas. Vibrations due to trains passing will also comply with the relevant human comfort requirements of the SEPP.
- With regards to mechanical plant and equipment noise emissions, under a worst-case scenario (noting that building plant equipment will be confirmed at the Construction Certificate stage), predicted noise levels onto surrounding sensitive receivers comply with the relevant requirements upon the implementation of mitigation measures including the installation of acoustic screens to mechanical plantrooms, and installation of attenuators for all carpark supply fans.
- With regards to loading dock and waste collection noise emissions, predicted noise levels at surrounding sensitive receivers due to dock activities comply with the relevant requirements.
- Noting that the childcare tenancy will be subject to a separate fitout and use DA in the future, a preliminary noise assessment indicates that the centre will comply with the relevant acoustic criteria for both indoor and outdoor play areas. A 1.8 metre acoustic barrier will be erected around the outdoor area.
- The predicted additional noise impact due to traffic generated by the development will largely be imperceptible compared to current traffic conditions and will comply with the NSW Road Noise Policy.
- For construction noise, there are no predicted adverse acoustic or vibration impacts following the erection of an acoustic barrier around the perimeter of the site and the implementation of noise mitigation measures for construction work as delineated within the report. Short and long term noise and vibration monitoring will be undertaken during construction to ensure that there are no exceedances.

Therefore, the Noise and Vibration Assessment concludes that the proposed development is supportable on acoustic and vibration grounds. The recommendations will be incorporated into the design of the proposed development.

5.14 Social Impact

A Social Impact Assessment (SIA) is attached at **Appendix CC**. The SIA analyses the envisaged social impacts that may arise from the proposed development, with regards to social trends and issues affecting the local and broader surrounding areas, in accordance with the *Draft Social Impact Assessment Guidelines* (DPIE, 2020).

The SIA found the overall long-term social impact of the development to be positive. Negative impacts related to the construction phase of the development and can be effectively mitigated through a Construction Management Plan. The SIA noted the following:

- The increased housing on site co-located with public transport, planned public open space, a childcare centre and convenient retail options is expected to improve way of life and accessibility for future residents.
- The improved access to open space facilitated by the proposed development, including the delivery of the Eden Street Park, will support resident and visitor wellbeing through opportunities for physical activity and social interaction, including between residents of social and market housing.
- The increased provision of social housing will support residents in the area experiencing housing stress and disadvantage. Former residents of the site returning post redevelopment will benefit from its improved quality and amenity.
- Negative impacts of the proposal relate to impacts during construction, including temporary loss of 142 social housing units (noting that the units have already been vacated prior to their use as COVID-19 crisis housing), and temporary impacts on amenity with regards to noise, traffic/parking, vibration, and air quality. These issues can be mitigated through the implementation of a Construction Management Plan.

Hence, the SIA concludes that the proposal represents a positive development for the Arncliffe community, and therefore is supported from a social impact perspective.

5.15 Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (CPTED) Assessment of the proposed development is attached at **Appendix F**. The CPTED Assessment provides an analysis of the potential opportunities for crime and the perceived fear of crime that may be associated with the proposed development, including a comparison with the existing built form at the site. The assessment also provides recommendations to minimise this crime risk.

The CPTED Assessment assigns the proposed development a default crime risk rating of 'moderate', which is then reduced to 'low' following the implementation of the recommendations given within the report. These recommendations and initiatives, such as residential access control, CCTV surveillance and environmental management will be further explored and effectively implemented at the design finalisation and operational stages of the development should this SSDA be approved.

The proposed development is a substantive improvement over existing site conditions, which exhibits very poor urban amenity as shown in **Figures 4 – 9** in **Section 2.3** above.

The CPTED Assessment finds that:

- The proposed development provides for a high level of natural surveillance, both to the development itself and surrounding area, including through active spaces, passive surveillance opportunities through windows, and accommodation of pedestrian activity. The retail tenancies and childcare centre are also expected to be occupied at various times, further improve passive surveillance to the streetscape.
- The proposed development provides for an appropriate level of territorial reinforcement without appearing overly 'fortified', with clear delineation between public and private space through design cues. The provision of active spaces such as the retail areas, through site link, meeting place and new public park will increase the presence of informal guardians.
- The proposed development provides for effective social inclusion, where there is no obvious physical and visual division of residents based on their tenure type. Building C has been carefully designed to form an integral part of the renewed Eden Street precinct.
- An appropriate level of CPTED initiatives is provided for the childcare centre, including the implementation of a 1.8 metre solid high fence and pedestrian access to the centre being separate from the other entrances of the

buildings. Landscaping treatments to the perimeter of the centre will minimise opportunities for members of the public to look into the childcare outdoor space. The future operator of the childcare centre may explore further initiatives for CPTED including installation of CCTV and management strategies for the outdoor play area.

- The development provides for appropriate access control through clear separation of residential entries from commercial spaces, and further benefits from the separation of lift cores and car parking areas for these uses. The development separates the mail and waste rooms between retail and residential uses, reducing the potential for theft by criminals stealing mail and preventing the disposal of retail waste into residential bins.

For these reasons, the report confirms that the proposed development is supportable on CPTED grounds.

5.16 Accessibility

An Accessibility Statement is attached at **Appendix G**. The report provides an assessment of the proposed development with regards to the Disability Discrimination Act (DDA), Building Code of Australia (BCA), relevant Australian Standards, and enhanced benchmark requirements set by the project for persons with mobility, sensory, or dexterity impairments.

The report confirms that the development is generally capable of compliance with the relevant requirements. Further work will be required during design development to ensure appropriate outcomes are achieved. This will be undertaken during the Construction Certificate stage, as consistent with industry best practice.

5.17 BASIX

A BASIX Certificate has been prepared by Integreco and is attached at **Appendix DD**.

5.18 Ecologically Sustainable Development

An Ecologically Sustainable Development (ESD) Report is attached at **Appendix Q**. The report identifies the key ESD initiatives that have been integrated into the design of the proposed development and considers relevant state and local government policy and planning instruments.

The key ESD initiatives of the proposed development include the following:

- Implementing design measures that achieves a NatHERS rating exceeding the requirements of the National Construction Code (NCC) Energy efficiency performance provisions;
- Integrating energy efficiency measures achieving a BASIX Energy score exceeding the BASIX Energy Target for high-rise residential buildings;
- Meeting the deemed to satisfy (DTS) provisions of the NCC Section J Energy efficiency for all retail premises;
- Deploying on-site renewable energy through a solar photovoltaic (PV) array, and integrating water efficiency and water reuse measures;
- Minimising waste through an operational waste management plan promoting responsible separation of waste, and diverting at least 85% of construction waste from landfill;
- Minimising pollution during and after construction, including through utilising materials with a low environmental impact; and
- Incentivising a modal shift away from private car ownership/use through transit-oriented development.

In summary, the ESD report concludes that the proposed development represents a holistic response to ESD and is supportable.

5.18.1 Principles of ESD

The EP&A Regulation lists 4 principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;

- Conservation of biological diversity and ecological integrity; and
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

Precautionary principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS has not identified any serious threat of irreversible damage to the environment and therefore the precautionary principle is not relevant to the proposal.

Intergenerational equity

Inter-generational equity is concerned with ensuring that the health, diversity, and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations by:

- implementing safeguards and management measures to protect environmental values;
- facilitating job creation during both the construction and operational phases of the proposed development;
- providing high quality social housing for use by both current and future generations; and
- providing high quality communal and public open space at the site for the enjoyment of both current and future generations.

The proposal has integrated short and long-term social, financial, and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Conservation of biological diversity and ecological integrity

The proposal is not considered to have a significant effect on the biological diversity and ecological integrity of its surrounding area, as confirmed in **Section 5.23** below.

Improved valuation, pricing, and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. These resources have all been addressed within this EIS in accordance with the issued SEARs. Mitigation measures (**Section 6**) have been implemented to ensure the responsible use of resources, and that no environmental resources are adversely affected by the proposal.

5.19 Tree Removal

An Arborist Report is attached at **Appendix J**. The report provides an analysis of the impact of the development on trees, including the trees within the subject site and the immediate vicinity (both within private and public properties). The report sets out a schedule of the relevant trees, an appraisal of the development's impact on trees, and any resultant impacts on local character and amenity. The report also provides a preliminary arboricultural method statement setting out appropriate protective measures for any trees to be retained.

The proposal involves a complete redevelopment of the site to facilitate new retail and housing close to Arncliffe Station generally in accordance with the RLEP 2011 and RDCP. The proposal includes significant new planting and publicly accessible open space. To enable this to occur it is proposed that the existing trees on the site be removed. No surrounding trees are to be removed.

To compensate for the removal of existing trees, an extensive replacement planting scheme will be implemented in accordance with the Landscape Plans at **Appendix I**, further discussed in **Section 4.8** above. The new trees will have potential to grow to a significant height. This includes semi-mature trees to be planted within available areas in prominent locations.

The Arborist Report concludes that the proposed development, as a whole, significantly improves the site's contribution to amenity and local character, subsequent to the replacement planting and the implementation of tree protection measures as discussed within the report.

5.20 Contamination and Ground Conditions

Contamination

A Stage 2 Detailed Site Investigation (DSI) is attached at **Appendix R**. The DSI follows the Stage 1 Preliminary Site Investigation (PSI) prepared by Reditus Consulting in 2019. The DSI assesses the contaminations of potential concern (PoTC) which were identified in the PSI and determines whether the site is/can be made suitable for the proposed development, and whether further remediation is required.

Sampling investigations were undertaken to determine the contamination status of soil at the site, with a total of 44 primary soil samples collected. It was found that all primary soil samples returned concentrations below the relevant human health and ecological site assessment criteria.

For the purposes of providing a preliminary waste classification, it was found that a number of the soil samples exhibited elevated concentrations of lead, and one sample exhibited elevated concentrations of Benzo(a)pyrene above that of the maximum criteria. These samples meet the Contaminant Threshold 1 criteria of General Solid Waste; such waste will need to be disposed of accordingly. Recommendations have been provided within the report aiming to ensure the site remains suitable for the development and the most beneficial waste classification is achieved.

The DSI confirms that the site can be made suitable for the proposed development, without requiring the preparation of a Stage 3 Remediation Action Plan (RAP).

Geotechnical Considerations

With regards geotechnical impacts, the DSI confirms that the site has a topsoil/hardstand layer comprised of grass, pavement, asphalt and/or concrete slab to a depth of 0.1m; below of which is the fill layer comprising silty sand to a depth of 1.1m; further below of which is sandy clay, silty clay and/or silty sand to a maximum depth of 4.1m below ground level. No asbestos was recorded in any of the soil samples analysed. The site has been identified as an area of extremely low probability for Acid Sulfate Soils (ASS), and accordingly no ASS is considered to be present at the site.

5.21 Flooding Impact

A Flood Impact Assessment Report is attached at **Appendix T**. The report confirms that the proposed development will not generate, and is not adversely affected by, significant flooding impacts. The report concludes that:

- The design of the proposed development ensures that all habitable floorspace is located at least 300mm above existing ground level and flood refuge will be available on higher levels via internal areas as well as proposed open areas on site.
- The site is generally flood free during both 1-in-100 year (1%AEP) and the Probable Max Flood (PMF) events;
- Flood characteristics at the site following construction are expected to be largely consistent with existing site characteristics;
- Overland flows from the Princes Highway through the site are expected to increase due to climate change but will remain shallow and of low hazard; and
- Compliance with the Bayside Council flood engineering requirements will be achieved.

The proposed development is supported on flood planning grounds.

5.22 Stormwater Impact

A Stormwater Management Plan (SMP) is provided at **Appendix U**. The design of the proposed development will incorporate two On Site Detention (OSD) tanks sized accordingly to meet the requirements of their respective catchment areas, with 137m³ and 300m³ of OSD volume provided, respectively. An in-ground stormwater pipe and pit upgrade system is proposed along Eden Street to direct stormwater from the site to the existing Council stormwater network in Burrows Street – this is consistent with Council’s preferred method of connection.

MUSIC modelling has confirmed that the proposed stormwater treatment achieves Council’s targets for a full range of pollutants, including for gross pollutants, total suspended solids, total phosphorus, and total nitrogen. The SMP confirms that the proposed development is capable of effectively managing stormwater discharge, so that there is no detrimental effect on water quality downstream of the site.

The proposed development is supported on stormwater grounds.

5.23 Biodiversity

In accordance with Section 7.9 of the *Biodiversity Conservation Act 2016*, an assessment of any SSD’s biodiversity impacts must be undertaken as part of the provision of any SSD DA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required.

The proposed development is in an urban environment and will not result in adverse environmental impacts with regards to biodiversity. An application was lodged on 10 November 2020 requesting that the DPIE, in consultation with Environment, Energy & Science Group, waive the requirement to prepare a BDAR on the grounds of the development being unlikely to impact biodiversity values in accordance with Clause 1.5 of the *Biodiversity Conservation Act 2016* and Clause 1.4 of the *Biodiversity Conservation Regulation 2017*.

The DPIE issued a BDAR waiver on 16 February 2021 (refer **Appendix V**).

5.24 Air Quality

An Air Quality Assessment is attached at **Appendix Z**. The report provides an assessment of the potential air quality impacts that are associated with the proposed development.

The assessment confirms that the proposed development will not be adversely affected by air quality, nor would it have an adverse impact on air quality. All pollutant levels at the site are expected to be within the relevant impact assessment criteria. The levels of air pollutants experienced at the site would be consistent with those experienced at the site’s surroundings, noting that density residential developments of a scale similar to the proposal already exist or have been approved in the vicinity of Princes Highway.

The report concludes that the proposed development is supportable.

5.25 Waste Generation and Management

A Construction Waste Management Plan (CWMP), and Operational Waste Management Plan (OWMP) are appended to this EIS at **Appendix W** and **Appendix X**, respectively.

5.25.1 Construction Waste

The CWMP identifies the expected waste generation during the demolition and construction phases of the proposed development, and how it will be managed, recycled, and reused.

The Construction WMP also outlines the site-specific operational measures to be undertaken at the site. All staff employed during the project’s demolition and construction stages will undertake site-specific induction training regarding waste management procedures to ensure environmentally appropriate waste management.

5.25.2 Operational Waste

The OWMP identifies the expected waste generation during the operational phase of the proposed development, and how this waste is to be managed.

Residential Uses

For Buildings A, B and D (market housing), one single waste chute will be installed with access on each residential level. Residents will wrap or bag their general waste before placing it in the chute. For Building C (social housing), one dual chute for the disposal of waste and recyclables will be installed.

The above rates require the collection of waste twice weekly for both general waste and recycling (comingled recyclables). The rates provided are estimates and bin sizes, quantities, and collection frequencies may require to be modified by the building manager as required.

Prior to collection, the building caretaker will be responsible for transporting the bins from each chute discharge room on basement level 1 to the residential waste collection room on upper ground level. Residents will liaise with building management regarding the transportation of bulky items to their respective bulky waste room.

Retail Uses

As retail tenants are not yet known, the rates provided in the Plan are estimates only. Sizes, quantities, and collection frequencies may require modification by the building manager as required and dependent on the final tenancy arrangement.

Retail and childcare staff will be responsible for the storage and maintenance of general waste, paper/cardboard, and comingled recyclables back of house. A private waste contractor will be engaged to collect the general waste and recyclables per an agreed schedule. To service the bins, a private collection vehicle will enter the site from Eden Street and reverse in the designated loading area on upper ground level.

5.26 Utilities and Services

An Infrastructure Management Plan (IMP) is attached at **Appendix AA**. The IMP outlines the proposed utility infrastructure requirements of the proposed development, and the development's impact on existing infrastructure capacity. In summary, the IMP found that:

- The existing sewer drainage infrastructure, operated by Sydney Water, is sufficient to service the proposed development;
- Potable water supply may require amplification to cater to the needs of the precinct, and pressure boosting pumps are to be installed to ensure that upper levels receive adequate water pressure;
- The existing gas mains are sufficient to meet the needs of the proposed development, as confirmed with Jemena; and
- A formal submission will be submitted to Ausgrid to determine the available capacity of electrical supply infrastructure (HV network), and to confirm viability of the proposed substation infrastructure.

The IMP concludes that there is adequate capacity to support the proposed development.

5.27 Building Code of Australia

An assessment of the proposed development against the Building Code of Australia (BCA) is attached at **Appendix EE**. The BCA Assessment ensures that the proposed development has been reviewed by an appropriately qualified Registered Building Surveyor, and that it complies, or is capable of compliance with, the relevant provisions of the BCA.

The BCA Assessment confirms that the design of the proposed development is capable of compliance with the BCA. The report identifies a number of matters which require further verification but notes that these matters can be clarified and resolved at the Construction Certificate stage, as is standard industry practice, without giving rise to inconsistencies with the development consent.

5.28 Fire Safety

A Fire Engineering Statement for the proposed development has been prepared by Stantec and is attached at **Appendix FF**. The statement relates to the fire safety design aspects of the development and confirms that it generally satisfies the Performance Requirements of the BCA as they relate to fire safety; with aspects to be further designed through performance-based Fire Engineering to achieve compliance at the Construction Certificate stage.

5.29 Wind Impact

A Wind Impact Assessment (WIA) is attached at **Appendix K**. The WIA contains a qualitative study of the expected wind impacts of the proposed development, including whether the proposed communal and public open spaces, building entry points, and balconies – comply with the relevant wind safety and comfort criteria.

In summary, the WIA finds that the relevant points of interest generally comply, or are capable of compliance, with the safety and comfort criteria. However, the WIA recommends the following mitigation measures:

- Extensive landscaping along Eden Street, Princes Highway, Eden Street Park and the through-site link;
- Provision of a solid horizontal windbreak for the building lobby entrances for Buildings A, B and C;
- Provision of horizontal and vertical wind mitigation measures (e.g. awnings, louvres) for the childcare centre;
- Provision of a minimum 1.8 metre balustrade along communal space perimeter locations indicated within the report; and
- Provision of a minimum 1.8 metre balustrade or equivalent along rooftop gardens facing south, southeast and west with landscaping close to any seating areas.

Following the implementation of the mitigation measures there are expected to be no adverse wind impacts. It must also be noted that the analysis was undertaken on the basis of maximum expected wind gusts and winds at the site would be generally much milder than delineated in the report. Mitigation measures have already been implemented into the design of the proposed development, while others will be further explored and implemented at the detailed design stage of the project. This will accompany the carrying out of detailed wind tunnel testing to reliably quantify the results and mitigation measures prior to construction.

5.30 Lighting

The design and location of lighting at the site will be finalised during the detailed construction drawings phase of the proposed development, prior to the commencement of works. All lighting will be designed in accordance with the relevant Australian Standards and guidelines, including *Australian Standard 4282(1997): Control of obtrusive effects of outdoor lighting*, to ensure that there are no adverse impacts on sensitive receivers. The recommendations of the CPTED report (**Appendix F**) in providing adequate lighting to communal and public open spaces will also be incorporated.

5.31 Site Suitability and the Public Interest

As discussed in **Section 1.5** above, there is a strong strategic need for the proposal due to its significant public benefits, including the delivery of significant public open space and new high quality social housing. For these reasons, it is suitable for the site and in the public interest. The project:

- is consistent with Council's vision for the Eden Street site outlined in the Rockdale Development Control Plan 2011;
- enhances and catalyses the ongoing development of the Arncliffe Planned Precinct in line with relevant strategic planning documentation including the *Greater Sydney Region Plan*, *Eastern City District Plan* and *Bayside West Precincts 2036*;
- delivers 180 new social dwellings on a key LAHC site, providing significant public benefits by housing people who are unable to access accommodation on the private market; and
- enhances the amenity, vibrancy, and availability public open space offering within Arncliffe, including through the delivery of a new retail precinct, childcare centre and 4,000m² Eden Street Park.

6.0 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) establishes a residual risk by reviewing the significance of environmental impacts and the ability to manage those impacts. The ERA for the Eden Street Communities Plus project has been adapted from Australian Standard AS4369.1999 Risk Management and Environmental Risk Tools.

In accordance with the SEARs, the ERA addresses the following significant risk issues:

- the adequacy of baseline data;
- the potential cumulative impacts arising from other developments in the vicinity of the site; and
- measures to avoid, minimise, and/or offset the predicted impacts where necessary involving the preparation of detailed contingency plans for managing any significant risk to the development.

Figure 42 below indicates the significance of environmental impacts and assigns a value between 1 and 10 based on:

- the receiving environment;
- the level of understanding of the type and extent of impacts; and
- the likely community response to the environmental consequence of the project.

The manageability of environmental impact is assigned a value between 1 and 5 based on:

- the complexity of mitigation measures;
- the known level of performance of the safeguards proposed; and
- the opportunity for adaptive management. The sum of the values assigned provides an indicative ranking of potential residual impacts after the mitigation measures are implemented.

Significance of impact	Manageability of impact				
	5 Complex	4 Substantial	3 Elementary	2 Standard	1 Simple
1 – Low	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)	2 (Low)
2 – Minor	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)	3 (Low)
3 – Moderate	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)	4 (Low/Medium)
4 – High	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)	5 (Low/Medium)
5 – Extreme	10 (High)	9 (High)	8 (High/Medium)	7 (High/Medium)	6 (Medium)

Figure 43 Risk Assessment Matrix

Source: Ethos Urban

Table 15 Environmental risk assessment

Item	Phase Construction/Occupation	Potential environmental impact	Proposed mitigation measures and/or comment	Significance of impact	Manageability of impact	Residual impact
Built form and visual impact	O	<ul style="list-style-type: none"> Visual impact of the development when viewed from the public domain. Potential for adverse overshadowing impacts. 	<ul style="list-style-type: none"> The proposed built form is generally consistent with the bulk and scale established under relevant planning controls as per Section 5.3. The built form has been designed with the DCP built form study as a basis and incorporates architectural elements to reduce perceived bulk and scale. Overshadowing analysis in Section 5.6 above confirms the proposed built form will not generate adverse overshadowing impacts. 	3	1	4 <i>Low/Medium</i>
Penetration of airport OLS surface	C/O	<ul style="list-style-type: none"> Penetration of the airport OLS surface during construction and by buildings A & B. 	<ul style="list-style-type: none"> An application will be made to the Sydney Airport authority and CASA to ensure there will be no safety impacts. Aircraft warning lights will be installed on construction cranes. 	1	1	2 <i>Low</i>
Transport, traffic, parking and access	C/O	<ul style="list-style-type: none"> Increased traffic on local road network during construction and/or operation. 	<ul style="list-style-type: none"> The proposal locates density in close proximity to Arncliffe railway station, embodying the principles of transit-oriented development. Allocation of parking at the site takes into account this proximity to public transport, striking balance between the ADG and DCP parking rates. The proposal incorporates bicycle parking spaces and initiatives to promote activate transportation. Co-location of retail and residential uses will minimise the need for travel and hence traffic generation. During construction, efforts will be made to minimise heavy vehicle movements during peak hours. 	3	2	5 <i>Low/Medium</i>
Aboriginal cultural and heritage impacts	C/O	<ul style="list-style-type: none"> Potential for Aboriginal archaeological objects to be found during construction. Consultation with the Aboriginal community, and opportunities for co-design 	<ul style="list-style-type: none"> Likelihood of Aboriginal archaeological objects on-site have been confirmed to be very low. Nevertheless, if objects are found, work will cease and the OEH is to be notified. Implement the findings and recommendations of the ACHA Report (Appendix S) and Urban Design Report (Appendix B) in relation to designing for Country. 	1	1	2 <i>Low/Medium</i>

Item	Phase Construction/Occupation	Potential environmental impact	Proposed mitigation measures and/or comment	Significance of impact	Manageability of impact	Residual impact
Impacts on non-Aboriginal heritage items	C/O	<ul style="list-style-type: none"> Impact on surrounding heritage items. Potential for archaeological objects to be found during construction. 	<ul style="list-style-type: none"> The proposed built form will not result in adverse impacts on surrounding items as confirmed in the Heritage Impact Statement (HIS; Appendix O). Archaeological Assessment confirms there is no significant potential for archaeological items to be located on site. Nevertheless, if items are found works will cease and an archaeologist notified to assess the finds. 	1	1	2 <i>Low</i>
Noise and vibration impacts	C/O	<ul style="list-style-type: none"> Noise and vibration impact during construction. Noise and vibration impact during operation. 	<ul style="list-style-type: none"> Implement the recommendations given in the Noise and Vibration Assessment (Appendix P), including incorporation of acoustic treatments into residential buildings where required. Ensure during future detailed design that building plant(s) chosen will not exceed the relevant acoustic criteria. Comply with nominated acoustic and vibration criteria during construction, subject to detailed construction methodology. 	2	2	4 <i>Low/Medium</i>
Social impact	O	<ul style="list-style-type: none"> Potential for poor integration of social and market housing. 	<ul style="list-style-type: none"> The proposed built form ensures that the social housing building (Building C) is indistinguishable from a design standpoint to its surroundings. Implement the findings of the Social Impact Assessment (Appendix CC). 	3	1	4 <i>Low/Medium</i>
CPTED and safety	O	<ul style="list-style-type: none"> Potential for crime and unsafe behaviour. 	<ul style="list-style-type: none"> Implement the findings and recommendations of the CPTED Assessment (Appendix F). 	2	2	4 <i>Low/Medium</i>
Biodiversity	C/O	<ul style="list-style-type: none"> Potential impacts on biodiversity, flora, and fauna. Tree removal. 	<ul style="list-style-type: none"> A BDAR Waiver has been issued for the project (Appendix V) confirming no significant impact on biodiversity values. Undertake landscaping and replacement vegetative planting at the site in accordance with the Landscape Plans (Appendix I). 	1	1	2 <i>Low</i>
Flooding and stormwater impact	O	<ul style="list-style-type: none"> Potential flood impacts during 1%AEP and PMF flood events. 	<ul style="list-style-type: none"> The Flood Impact Assessment Report (Appendix T) confirms the design of the proposed development will not generate adverse flood impacts and the site will be generally clear of flooding during 1%AEP and PMF events. 	2	1	3 <i>Low</i>

Item	Phase Construction/Occupation	Potential environmental impact	Proposed mitigation measures and/or comment	Significance of impact	Manageability of impact	Residual impact
		<ul style="list-style-type: none"> Potential for excessive/polluted stormwater runoff. 	<ul style="list-style-type: none"> Continue to ensure all habitable floorspace is located at least 300mm above existing ground level. Implement the design of OSD tanks and stormwater infrastructure in accordance with the Stormwater Management Plan (Appendix U). 			
Air quality impacts	C/O	<ul style="list-style-type: none"> Impacts on air quality. 	<ul style="list-style-type: none"> Air Quality Assessment (Appendix Z) confirms no adverse impacts on air quality. Minimise dust generation during construction, subject to detailed construction methodology. 	1	1	2 <i>Low</i>
Waste generation and management	C/O	<ul style="list-style-type: none"> Waste generation during construction. Waste generation during operation. 	<ul style="list-style-type: none"> Implement the findings and recommendations given in the Construction Waste Management Plan (Appendix W). Implement the findings and recommendations given in the Operational Waste Management Plan (Appendix X). 	2	1	3 <i>Low</i>
Adequacy of utilities and services infrastructure	O	<ul style="list-style-type: none"> Additional demand on existing utilities. 	<ul style="list-style-type: none"> Augment existing utilities where required in accordance with the Infrastructure Management Plan (Appendix AA). 	1	2	3 <i>Low</i>
Wind comfort and safety impacts	O	<ul style="list-style-type: none"> Adverse wind impacts leading to poor pedestrian comfort. 	<ul style="list-style-type: none"> Implement the findings and recommendations of the Wind Impact Assessment (Appendix K), noting that a number of initiatives have already been implemented. 	2	3	5 <i>Low/Medium</i>

7.0 Mitigation Measures

The measures required to mitigate the impacts associated with the proposed works are detailed in **Table 20** below. This section complements the discussion of environmental impacts in **Section 5** and those detailed in the appended consultants' reports.

Table 16 Mitigation measures

Mitigation Measures
<p>Detailed Design</p> <ul style="list-style-type: none"> All proposed buildings and structures will be designed and constructed in accordance with the relevant requirements of the Building Code of Australia, with reference to the BCA Assessment prepared by Blackett Maguire + Goldsmith (Appendix EE), Accessibility Statement prepared by Morris Goding Access Consulting (Appendix G), and Fire Engineering Statement prepared by Stantec (Appendix FF).
<p>Construction Management</p> <ul style="list-style-type: none"> A detailed Construction Environmental Management Plan is to be submitted to the Principal Certifying Authority prior to the commencement of construction works. Prior to commencement of demolition works an intrusive hazardous materials survey of all structures subject to demolition is to be prepared. All identified hazardous materials are to be recorded and maintained on an up-to-date register and subsequently removed by a SafeWork Licenced Asbestos Assessor and / or appropriately licensed removalist prior to any demolition activities (Appendix R). Following demolition, further in situ sampling of the site in accordance with the sampling design guidelines as stated in NSW EPA 1995 and referenced in the NSW ENM order of 2014 with the inclusion of pH, EC and NSW RTA T276 Foreign materials analysis in accordance with the recommendations of ADE Consulting Group (Appendix R). Noise and vibration during construction is to be managed in accordance with the Construction Environmental Management Plan, and the Noise and Vibration Assessment prepared by Stantec (Appendix P). A Construction Air Quality Management Plan should be prepared separately or form part of the Construction Environment Management Plan, with reference to the Air Quality Assessment prepared by Todoroski Air Services (Appendix Z). A detailed Construction Traffic Management Plan is to be submitted to the Principal Certifying Authority prior to the commencement of works, with reference to the preliminary CTMP provided within the Traffic and Parking Impact Assessment prepared by Stanbury Traffic Planning (Appendix N). Waste management during construction is to be managed in accordance with the Construction Environmental Management Plan, and the Construction Waste Management Plan prepared by Elephants Foot (Appendix W).
<p>Aviation</p> <ul style="list-style-type: none"> An application is to be made to the Sydney Airport authority and CASA before the encroachment of construction cranes into the Obstacle Limitation Surface (OLS) in accordance with the Airspace Assessment prepared by Thompson GCS (Appendix Y). The application will also be referred during the assessment process due to the encroachment of two of the four proposed buildings into the OLS.
<p>Transport, Access, and Parking</p> <ul style="list-style-type: none"> The detailed design of transport, access and parking arrangements should generally be consistent with the Traffic and Parking Assessment prepared by Stanbury Traffic Planning (Appendix N), with reference to Australian Standards AS2890 (Parking Facilities) and associated requirements Any intersection upgrade and public domain works will be designed and completed in consultation with the relevant road authority.
<p>Aboriginal Cultural Heritage</p> <ul style="list-style-type: none"> Ensure opportunities for Aboriginal cultural themes have been integrated into the design of the proposed development in accordance with the Aboriginal Cultural Heritage Assessment prepared by WSP (Appendix S), and the Urban Design Report prepared by Group GSA (Appendix B). Implement an unexpected finds protocol should be implemented during construction in the case of any unexpected finds.
<p>Noise and Vibration</p> <ul style="list-style-type: none"> Implement the recommendations given in the Noise and Vibration Assessment (Appendix P), including incorporation of acoustic treatments into residential buildings where required. Building plant is to be selected during detailed design must not exceed the relevant acoustic criteria. Noise and vibration during construction is to be managed in accordance with the Construction Environmental Management Plan, and the Noise and Vibration Assessment prepared by Stantec (Appendix P).
<p>Crime and Safety</p>

Mitigation Measures

- Implement the recommendations of the Crime Prevention Through Environmental Design (CPTED) Assessment prepared by Ethos Urban (**Appendix F**).

Flooding and Stormwater Impact

- Provide OSD tanks and stormwater infrastructure in accordance with the recommendations of the Stormwater Management Plan (**Appendix U**).

Archaeology

- In the event that unexpected historical archaeological objects or deposits are uncovered, works should cease and a qualified Archaeologist contacted to assess the significance of the material and recommend whether further investigation is required.
- If the finds are found to be Aboriginal objects, the Office of Environment and Heritage must be notified under section 89A of the *National Parks and Wildlife Act 1974*.
- Appropriate management and avoidance or approval under a Section 90 Aboriginal Heritage Impact Permit should then be sought if Aboriginal objects are to be moved or harmed.

Waste Generation and Management

- Waste management during construction is to be carried out in accordance with the Construction Waste Management Plan prepared by Elephants Foot (**Appendix W**).
- Waste management during operation is to be carried out in accordance with the Operational Waste Management Plan prepared by Elephants Foot (**Appendix X**).

Utilities and Services Infrastructure

- Where necessary, utilities and services infrastructure shall be extended and augmented in accordance with Authority requirements and specifications and with reference to the Infrastructure Management Plan prepared by JHA Services (**Appendix AA**) and appropriate negotiations with other affected property owners.

Air Quality

- Ensure that an appropriate level of air quality is maintained at the site during construction and operation, in accordance with the Air Quality Assessment prepared by Todoroski Air Services (**Appendix Z**).

Wind Impact

- Ensure a suitable level of wind pedestrian comfort is provided to all communal and public open spaces, building entry points, and balconies on the site.
- Implement the findings and recommendations of the Wind Impact Assessment (**Appendix K**).

Design Excellence

- To ensure the achievement of Design Excellence, the project team will be expected to:
 - retain lead roles over the relevant design decisions in the preparation of the design drawings for a construction certificate for the preferred design;
 - retain lead roles over design decisions in the preparation of the design drawings for the contract documentation; and
 - ensure that design continuity is maintained during all demolition and construction phases through to the completion of the project.

Operation of Retail Tenancies

- The detailed fit-out, operation, and signage for the food and drink tenancy and any retail stores are to be the subject of separate applications and future approvals.
- Any commercial kitchen be fitted must with appropriate commercial exhaust ventilation systems that filter and treat discharges in accordance with the relevant Australian Standards, including to prevent adverse odour impacts.

8.0 Conclusion

This Environmental Impact Statement (EIS) has been prepared to consider the environmental, social, and economic impacts of the proposed development, being the delivery of a new mixed-use precinct on the Land and Housing Corporation Eden Street State Significant Development Site. It has comprehensively addressed the issues outlined in the SEARs (**Appendix C**). The development comprises social housing, market housing, retail floorspace, including a childcare centre, and a diverse array of communal and public open spaces.

The EIS has considered and assessed a range of environmental issues including compliance with environmental planning instruments, consistency with the strategic planning framework, built form and urban design, visual impact, public domain, vegetation, environmental amenity, overshadowing, consistency with the ADG, social impacts, transport and traffic impacts, noise and vibration, contamination, Aboriginal and non-Aboriginal heritage, stormwater/flooding, waste management, air quality, utilities and BASIX compliance.

In doing so, the EIS has confirmed that the proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective.

Having regard to environmental, economic, and social considerations, the carrying out of the project is justified for the following reasons:

- The proposal is permissible with consent and generally meets the statutory requirements of the relevant environmental planning instruments,
- The proposal is consistent with and improves upon Council's vision for the Eden Street LAHC site under the Rockdale Development Control Plan 2011;
- The proposal enhances and catalyses the ongoing development of the Arncliffe Planned Precinct in line with relevant strategic planning documentation including the *Greater Sydney Region Plan*, *Eastern City District Plan* and *Bayside West Precincts 2036*;
- The proposal will deliver 180 new social dwellings on a key LAHC site, providing significant public benefits by housing people who are unable to access accommodation on the private market;
- The development will enhance the amenity, vibrancy, and availability public open space offering within Arncliffe, including through the delivery of a new retail precinct, childcare centre and 4,000m² Eden Street Park;
- The proposal will not result in unacceptable environmental impacts and will provide significant employment outcomes during both construction and operation; and
- The proposal is suitable for the site and in the public interest.

Overall, the proposal will facilitate the timely redevelopment of the Eden Street site as part of LAHC's 'Communities Plus' programme, making a vital contribution to the ongoing renewal and delivery of new social housing dwellings across the state. It is generally consistent with the substantive planning work undertaken at the site to date, including: *State Environmental Planning Policy (State and Regional Development) Amendment (Eden Street) 2018* amending the SRD SEPP to include the site; the new planning controls for the site under *State Environmental Planning Policy Amendment (Arncliffe and Banksia Precincts) 2018*; and site-specific requirements of the Rockdale DCP 2011.

On this basis and given the merits of the proposal, we have no hesitation in recommending the proposal be approved.