ATTACHMENT 1 – Council Submission

SSDA 37 Archer Street, Chatswood

a) Landscape comments

Landscaping to Bertram Street

Insufficient soft / green landscaping is provided to the Bertram Street frontage for the interface with the adjoining residential Heritage Conservation Area (HCA).

Willoughby DCP Part L notes *"Setbacks greater than the minimum are encouraged, particularly at the interface with low density residential conservation areas."*

The development provides the minimum setbacks, with the majority occupied by paving, ramps, services and access points and the bleaches. The basement further restricts the deep soil area.

The bleaches should be removed to provide more soft / green landscaping buffer between the retail shop frontages and the residential properties in the HCA on Bertram Street.

Two further points are made regarding the bleaches:

- The bleaches are mostly accessed from the access ramp, which will require balustrading between the ramp and building due to the level differences, and therefore have limited integration with the retail frontages.
- The bleaches encourage looking into residential houses of the HCA and therefore should be removed. The Archer Street frontage and through site link should be the primary zones for active public space and outdoor seating.

The garden bed to the northern side of the driveway has a proposed soil depth of just 450mm with only low planting of ground covers grasses and low mounding shrubs. Taller planting should be provided to facilitate softening the bulk and scale of the development against the adjoining R2 low density conservation area, particularly in front of the service areas. Soil depth and volume must be provided to support at the very least a medium sized tree and some taller shrubs.

Fig. 1. 3D rendering view from Bertram Street; tree planting extends to the garden beside the driveway. Width of planting within the through site link along the northern boundary appears exaggerated.

Landscaping to Archer Street

The landscape plans show shrubs and planting up to the base of the bleaches. The use of the bleaches will encourage people walking through the garden beds leading to poor performance of the planting and insufficient landscape outcome. The Architectural Plans (Appendix D) appear to indicate paving within the landscape area in front of the bleaches. This further reduces the soft / green landscaping.

The extent of the bleaches into the landscape area should be reduced and designed to prevent / discourage access through the gardens. The width of stepping is requested to be minimised to provide soft / green landscaping.

As discussed below in relation to the through site link, the 3D renderings show planters mixed in with the bleaches, which is not shown on the landscape plans or architectural plans. Integration of planting with the bleaches and upper paving level should be considered in providing more planted landscape area within the Archer Street setback.

Through site link

Landscape Plan does not provide clear delineation between paving and landscape area; Paving and planting are shown to be overlaid on both the Landscape Plans (Appendix F) and Architectural Plans (Appendix D) in the through site link and on the Archer Street frontage. There must be a clear distinction of the extent of paving and clear indication of the planted out landscape area being provided.

The basement extends to the boundary on the North and South sides. Section 02 on Drawing No. LA LP 112 / 01 within the Landscape Plans (Appendix F) annotate a soil depth of 1000mm to support the landscaping and proposed trees. However, the RLs show a total depth to the basement structure of less than 530mm. Willoughby DCP requires a minimum of 600mm soil depth to be included in landscape area calculations, this area

should also be for planting of trees shrubs and grasses and should be not include areas of paving.

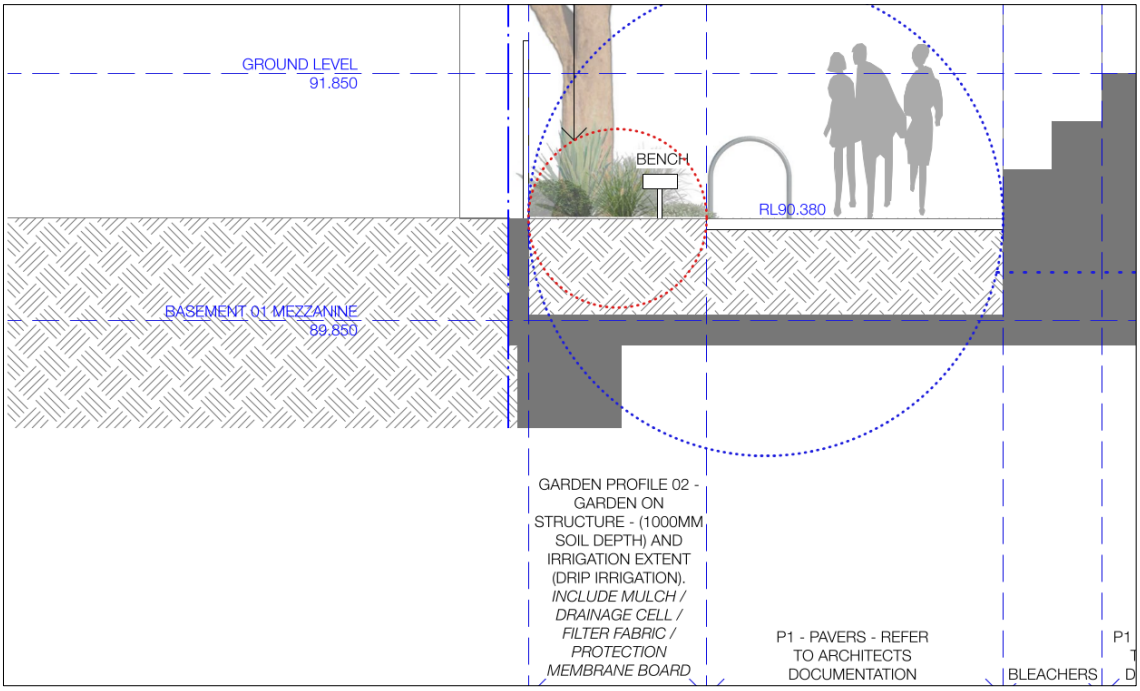

Fig. 2. Extract of Section 02 from Details and Sections (Dwg. No. LA LP 112 / 01) from Appendix F Landscape Plans; RLs indicate a soil depth less than 530mm.

For planting of large canopy trees (13-18m high with 16m spread) on structures the Apartment Design Guide (ADG) requires a minimum depth of 1200mmm, with an area of 10m x 10m or equivalent with a soil volume of 150m^3 per tree; the landscape plans show 5 trees which exceed 18m in height to be planted on structure. These figures from the ADG also assume fortnightly irrigation.

A **minimum** soil depth of 1200mm could be capable of supporting the proposed canopy tree species. The required soil depth must exclude any subsurface drainage provisions and surface mulch, therefore, a depth greater than 1200mm must be provided to the top of the basement structure.

In addition to the minimum soil depth requirements, sufficient soil volume must also be provided to support the trees. The landscape plans show a total soil volume for the area over structure being 205.83m^3 equating to 41.1m^3 per tree, which is insufficient to support large canopy trees. Noting also that majority of this soil area is covered be paving, which limits gaseous exchange for feeder roots.

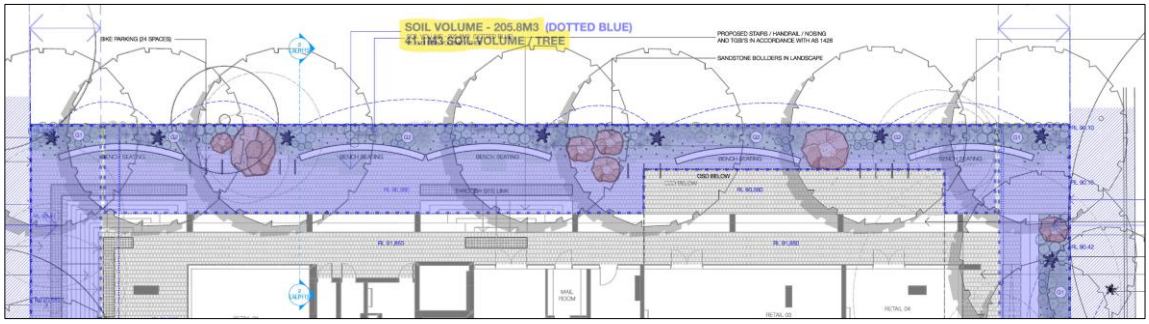

Fig. 3. Extract from Landscape Plan – Soil Volume (Dwg. No. LA LP 109 / 02) overlaid on Landscape Plan – Level 01 (Dwg. No. LA LP 101 / 02) from Appendix F Landscape Plans; Soil volume of through site link.

It should be noted that these are minimum requirements and consideration should be given to exceeding the minimum requirements to ensure a high quality outcome for the landscaping, particularly with regard to sustaining the healthy growth of large canopy trees that are required to contribute to greening of the through site link, providing green separation between developments to the north, and contribute to urban heat mitigation.

The Section 02 also shows a wall along the boundary which removes any opportunity for the site to the north to provide contiguous soil areas that can benefit the landscaping of both sites.

Council is in favour of the proposed tree species and the appropriate soil depth and volumes are to be provided to support the healthy growth of these trees.

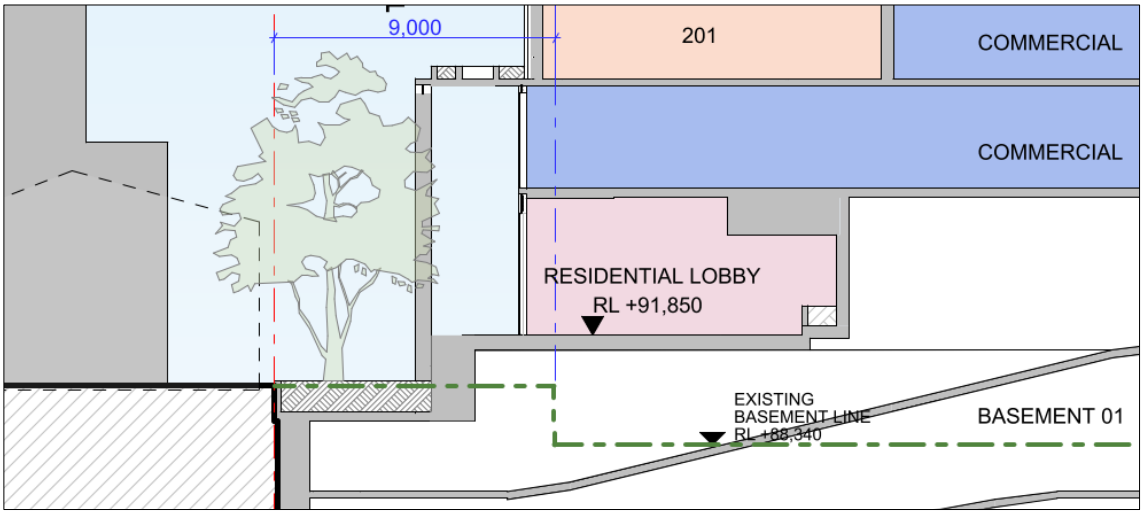

Fig. 4 Extract from Section A (SSDA 205) from Appendix D Architectural Plans; shallow soil area and isolated from opportunity to connect with landscape area on neighbouring site.

The landscape area provided in the through site link is less than 18% of the setback to the building. The average width of landscaping is approximately 1.4m from the 7.9m setback to the building line (As measured from the landscape plans).

A greater area of soft / green landscaping should be provided within the northern side setback.

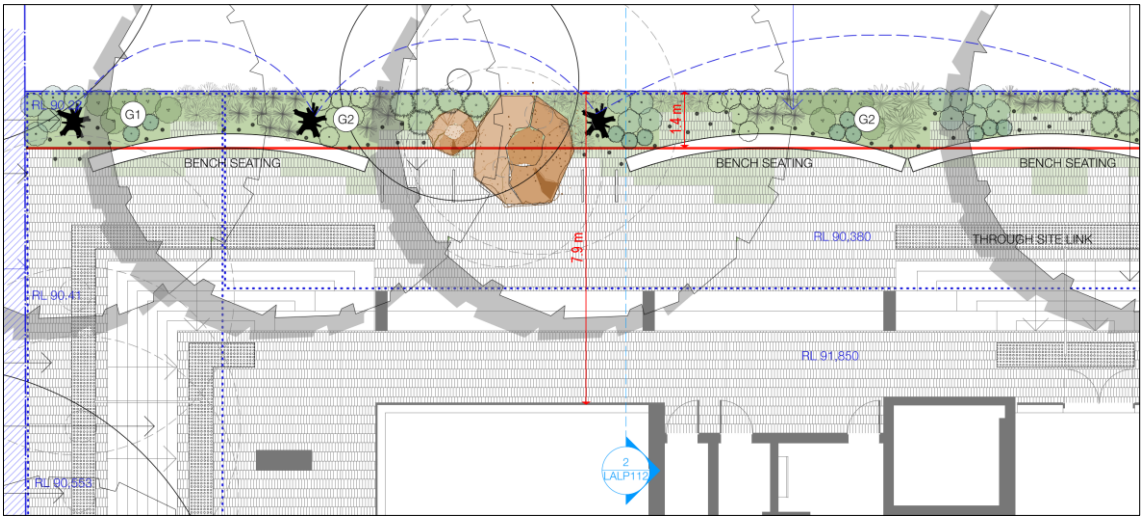

Fig. 5. Landscaping within the northern side setback.

The 3D rendering show planting areas mixed in with the bleaches along the through site link and along Archer Street, which is not shown on the landscape plans. Integration of planting with the bleaches, perhaps in a staggered or alternating arrangement, should be considered in providing more planted landscape area within the northern side setback.

Fig. 6. 3D rendering with planters integrated to the bleaches highlighted with yellow circles.

While increasing the planting areas, positioning of structures such as bike paths and benches restricting pathway width should be considered to avoid creating narrowing choke points. Minimum clearances must comply with AS 1428.1:2021 Design for access and mobility.

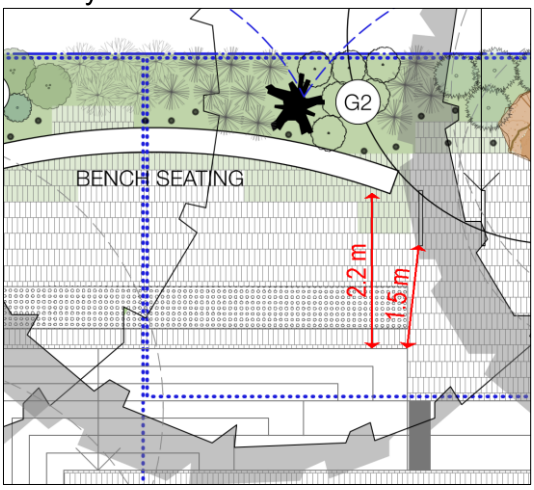

Fig. 7. Narrow points of through site link pathway should be considered to prevent choke points.

Existing tree removal and replacement

The AIA notes **39** trees to be removed from within the site. **19** are exempt and therefore a total of **20** trees require approval for removal. Willoughby DCP Part G Vegetation Management requires trees approved for removal shall be replaced at a rate of 3:1. Therefore a total of **60** replacement trees are required.

Street tree removal:
Council has no objection to the removal of the two street trees on Bertram Street, which are listed as undesirable species under Willoughby DCP Part G, being trees T47 & T48 as identified in the Arboricultural Impact Assessment (AIA) (Appendix Z). As the trees are listed as undesirable species Council will accept replacement planting at 1:1 with mature stock.

To enable Council to co-ordinate the street tree planting for Bertram Street, the species selection must be obtained from Council prior to planting.

Replacement canopy tree planting
It is noted that the Landscape Plans do not provide plant quantities or pot sizes. Replacement trees to be planted in the deep soil zones must be planted as semi-mature. Advanced must be used at a minimum for all other tree planting.

As per Willoughby DCP:

- *"Semi mature trees are generally a species that is transplanted with an overall height greater than 4m".*
- *Advanced trees are generally a species that has been grown in a plant nursery for 2 to 5 years.*

The Landscape Plans show the following trees:

Ground level	15 canopy trees
Level 01	5 palm trees
Level 08	6 canopy trees & 9 palm trees
Level 12	2 canopy trees
Roof top	4 canopy trees
Total	**27 canopy trees & 14 palm trees**

Palms are generally not accepted for replacement canopy tree planting under Council's standard conditions. Palms can be accepted on larger developments where they account for less than 1/3 of replacement trees being planted on site and sufficient broad canopy trees are provided.

41 replacement trees are proposed to be planted on site, spread across the ground level and levels 01, 08, 12 and the rooftop. There will be a shortfall of 19 replacement trees.

The shortfall in replacement tree planting shall be paid for under the Offset tree planting scheme in accordance with Willoughby DCP Part G.

Impact to existing trees to be retained

The AIA supports that the high retention value street trees on Archer Street can be retained and protected during the works.

Tree T15 (*Grevillea robusta*, Silky Oak) located on the neighbouring property to the north will be impacted by the basement excavation. The AIA does provide assessment of the impact to tree T15. Due to the proximity of the tree to the basement excavation, it is not expected the tree could be viably retained. The tree is an exempt species, however, it is located on the neighbouring property and therefore requires owners consent for removal. The AIA should be updated to provide assessment of the tree. If the tree is to be removed, owner's consent will be required.

The AIA notes tree T27 (*Lagerstroemia indica*, Crepe Myrtle) being located on the neighbouring property to the north is to be retained. The AIA notes the works being setback 3m from the tree and therefore will not impact the tree. The basement excavation extends to the boundary adjacent to this tree. The Basement 01 Mezzanine Level plan appears to show there would be a setback to the tree, however the Basement 01 Plan shows the basement extend right to the boundary within the Structural Root Zone (SRZ) for the tree. The AIA should be updated to account for the full basement excavation. If the tree is to be removed, owner's consent will be required.

If tree T27 is to be removed, replacement at 3:1 would be required and should be reflected in offset tree planting condition.

Trees T24, T37 & T46 are also located on neighbouring properties. They are not shown on the demolition plans, or landscape plans. Whilst these 3 trees are noted to be exempt species not requiring Council approval for removal, owner's consent will be required if the trees are to be removed.

Basix landscape requirements

The BASIX certificate shows a requirement for 550m^2 of indigenous or low water use planting in common area landscape. The area of landscaping to comply with this requirement is not indicated on the plans.

The landscape areas to be planted with indigenous or low water use plants must be clearly indicated on the Landscape Plans. The areas must only contain suitable plants to comply, and only include qualifying landscape areas with a minimum soil depth of 600mm.

b) Affordable housing comments

Council's preference is for built units, however Council's controls provide flexibility for payment of a monetary contribution. In the event this option is proposed, the appropriate figure is determined as follows:

- A figure (mean) for the market value of dwelling sales in Willoughby is obtained from the most recent (recent at the time of payment) Rent and Sales Report issued by the Department of Communities and Justice.
- A date stamped screenshot of the relevant figure within the Rent and Sales Report must be provided.
- The most recent WCC average unit size as published by Council must be assumed for the purposes of the calculation - as at 1 Feb 2025 this figure is 100m^2.

The SSDA should address the following in regards the affordable housing proposed (both in regards WLEP 2012 and the SEPP):

1) To ensure compliance with s 7.32 (3) (a) of the *Environmental Planning and Assessment Act 1979* and s 15 of the *State Environmental Planning Policy (Housing) 2021*, full details to be submitted to verify the following:

   (a) how the affordable housing aims to create mixed and balanced communities,
   (b) how the affordable housing is to be created and managed so that a socially diverse residential population, representative of all income groups, is developed and maintained in a locality,
   (c) how the affordable housing is to be made available to very low, low and moderate income households, or a combination of the households,
   (d) the methodology to ensure that affordable housing is rented to appropriately qualified tenants and at an appropriate rate of gross household income, (e) that land provided for affordable housing must be used for the purposes of the provision of affordable housing,
   (f) how buildings provided for affordable housing must be managed to maintain their continued use for affordable housing,
   (g) in what way affordable housing must consist of dwellings constructed to a standard that, in the opinion of the consent authority, is consistent with other dwellings in the area.

2) To ensure compliance with s 7.32 (1) and (3) (c) of the *Environmental Planning and Assessment Act 1979*, details are required to verify the following:

   (a) whether the proposed development will or is likely to reduce the availability of affordable housing within the area and the extent of the need in the area for affordable housing,
   (b) whether the proposed development will create a need for affordable housing within the area, or
   (c) whether the proposed development is allowed only because of the initial zoning of a site, or the rezoning of a site, or
   (d) whether the regulations provide for in this section apply to the application.

This information should be submitted as part of this SSDA.

c) Public art comments

A public art contribution condition is proposed in **Attachment 2** as follows:

> *Prior to the issue of a Construction Certificate, a public art contribution is to be provided in accordance with the Willoughby Public Art Policy and Procedures and Guidelines. (Reason: Ensure compliance with Council's Public Art Policy and amenity)*

If a public art strategy, consistent with the Willoughby Public Art Policy and Procedures and Guidelines, is to be proposed, it would need to outline and address the following:

- Demonstration of Excellence
- Involvement of Wiloughby Public Art Panel comprising:
  - Developer representative
  - Willoughby City Council representative (Urban Design Specialist and Arts and Culture Manager)
  - Independent Art Specialist (TBA)
- Project budget including breakdown:
  - Project (building) CIV
  - Public Art budget
- Public Art Ownership:
  - Dedication of the Public Art to the people of Willoughby
  - Agreement between Developer/Body Corporate and WCC regarding ownership
  - Artist Rights
  - Deaccession Plan/Agreement as noted in The Public Art Strategy Document
- Maintenance regimen and responsibilities Expected annual maintenance budget
- Insurances

Upon clarification from the proponent, in accordance with the abovementioned approach to public art, the following alternative condition may be included in any approval:

Public Art

a) Detailed Public Art Plan

The detailed public art plan must be developed and implemented in accordance with Council's Public Art Policy and Procedures and Guidelines. The Detailed Public Art Plan should include the public art concept/s illustrated in such a way that the form, dimensions, materials and location of the proposed artwork are clearly communicated. It should include a brief statement explaining the rationale behind the artwork and should demonstrate how the proposed work will relate to the proposed development and site.

It should provide a program for documentation, fabrication and installation and integration with the construction program for the development. It should also provide engineer's drawings, expected maintenance requirements and deaccessioning agreements. The Public Art Plan will be reviewed by the Public Art Advisory Panel for comment and any recommendations will be recorded and passed on to the developer.

b) ***Final Public Art Report to be submitted at Occupation Certificate Stage***

Prior to the release of the Occupation Certificate, the written consent of Council's Planning and Infrastructure Director must be obtained that confirms the public art has been delivered in accordance with the Public Art Plan. The Final Public Art Report should provide information about the artworks and artist, the fabrication and installation of the work, the documentation and engineers' drawings, the maintenance requirements, any additional relevant information regarding ownership, and copyright of the work.

(Reason: Ensure compliance with Council's Public Art Policy)

d) Engineering comments

Vehicle Access and Parking

The vehicle access to the site is located immediately against the site boundary. In order to ensure that there is separation from any vehicle crossing on the adjacent property and to ensure that the crossing for the development is located fully in front of the development site, and doesn't impact adjacent properties, the vehicle crossing needs to be located a minimum of 1.2m off the site boundary. The proposed vehicle crossing has not been clearly shown on plans, so Council has not been able to confirm that it complies with Council's requirements, which include no splays between the layback and the property boundary. As the proposed vehicle crossing is located at a section of the road where the kerb bends to form a blister, the kerb line will need to be amended such that the layback for the vehicle crossing is located in line with the blister, and returns back beyond the vehicle crossing. Amended plans should be required to clearly show this area, including new kerb alignment and proposed vehicle crossing details.

The swept path diagrams provided for the service vehicle do not clearly show the extent of the vehicle crossing. As such, Council has not been able to confirm that the proposed crossing width is suitable for the proposed vehicle access.

The diagrams provided show that the largest service vehicle occupies the whole vehicle crossing and driveway area. Details need to be provided to confirm how potential conflicts will be managed, with particular attention to ensuring incoming vehicles have priority and that vehicles do not need to reverse out into the roadway.
As the majority of deliveries will occur with a smaller vehicle, the development should demonstrate that a Small Rigid Vehicle (SRV) is able to pass a passenger vehicle at all locations between the frontage road and the loading bay.

The swept path diagrams show significant overlap between two passenger vehicles within the circulation aisles in the basement parking area, including at the end of ramps. The circulation aisles and ramps need to be designed for allow for simultaneous maneuvering of a B99 and B85 vehicle at all locations, but particularly at ramp ends, to minimise conflict between vehicles.

The plans do not include dimensions for all parking spaces, so it is not clear if they comply with AS/NZS 2890.1 and AS 2890.6. Depending on the use, the spaces should comply with the following:

- Visitor spaces (Visitor and retail / commercial): Class 2 medium term spaces as per AS/NZS 2890.1, with a minimum width of 2.5m
- Residential spaces: Class 2 medium term spaces as per AS/NZS 2890.1, with a minimum width of 2.4m
- Commercial / retail spaces: Class 2 medium term spaces as per AS/NZS 2890.1, with a minimum width of 2.5m
- Accessible and adaptable spaces: As per AS 2890.6, with a minimum width of 2.4m and the required shared zones.

Blind aisle lengths potentially exceed the maximum length permitted without a turning bay. Any spaces in this location should be spaces allocated to a specific lot, so that any vehicle using the blind aisle has an assigned space and does not need to turn around.

Flooding

The submitted Flood Impact and Risk Assessment Report has provided details of the existing flood extent at the site and the impact of the proposed development on flood levels in the vicinity of the development.

The Afflux diagram provided in the report details that there is an increase in flood levels within the site and within streets fronting the site. These increases do exceed the 10mm generally accepted by Council as within the tolerances of the modelling. While comments have been provided around these increases, which are up to 110mm, further commentary needs to be provided, particularly around impact on the adjacent properties and the impact of the changes on the freeboard achieved to adjacent buildings.

The report details that ground floor levels comply with the flood planning levels for the site and are at or above the 1%AEP water level + 500mm requirement. However, the access point to the basement do not comply with the requirement to be at or above the PMF level or the 1%AEP water level + 500mm, whichever is higher. The access point to the basement is proposed to be at the PMF level, which is 300mm above the 1%AEP water level. As the site is located away from any trapped low points and the proposed level

allows for 300mm freeboard in the 1%AEP event, which will allow for some waves due to passing vehicles, Council has not objection to this variation.

Stormwater Management

The stormwater management plans include an on-site stormwater detention system and water quality improvement system as required by Council's Technical Standard 1. However, there are elements of the system that do not comply with Council's requirements and will impact the operation of the system.
As the system is required to be designed to cater for storms up to the 1%AEP event, the tank needs to be located at a level where the outlet of the tank is above the downstream 1%AEP water level. This is required to ensure that the tank outlet is not impacted by the downstream water level, which will impact the operation of the orifice / outlet. In order to demonstrate that the tank is not impacted by the downstream water level, a longitudinal section needs to be provided from the connection point to the Council system to the outlet of the OSD tank. The section needs to include a hydraulic grade line analysis, with the adopted downstream water level the 1%AEP water level as per the Flood Impact Report prepared for the development.
Access points to the OSD tank are generally location on one site only. To allow for cross-ventilation, safe access to the tank and to minimise the need to enter the tank, access points should be located at all corners of the tank, and as a minimum over the outlet and the diagonally opposite corner. To ensure that access is available at all times, particularly for emergency maintenance, all access points to the tank need to be located in common areas and not in tenancies. The plans are not clear that this is achieved. The architectural plans should be amended to show the location of the OSD tank and all access points to the tank.
As the tank is not located in a position where flows in excess of the capacity of the pipe network can drain to the OSD tank, the internal pipe network needs to designed to cater for the flow from the 1%AEP event.

e) Waste comments

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

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

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

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

This SSDA does not satisfy the minimum requirements for waste management in the WDCP 2023 (Section 4.3.8) and Northern Sydney Regional Organisation of Councils (NSROC) 2018 Waste Management Technical Guide and Development Controls. Waste-related comments for the proposed development are outlined below.

1. Incorrect waste collection frequency

Council collects general waste onsite in bulk bins twice weekly. Once per week is proposed (OWMP, 2025, Section 5.2 Residential bin summary).

2. Inconsistent number of households

The OWMP (2025, Rev D) calculates waste generation with 124 residential units, whereas the Architectural Plans (SSDA 002, Rev A, "Development Summary") includes 125 residential units.

3. Residential waste and recycling bins sizes

The bin sizes for residential waste and recycling should match, either 660L or 1,100L. Currently waste is proposed as 660L and recycling is proposed as 1,100L.

4. Charity waste / other recycling area

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

5. Temporary storage areas for collection (collection holding rooms)

The NSROC waste management guide (2018) requires temporary storage areas for collection through various sections, particularly Section 3.15 Temporary Bin Storage Areas, including Table 12. Key requirements are:

a) Distance from loading area, temporary holding rooms to be located within 2m of bin storage location (e.g., Section 2.1 – Table 1, Onsite Collection and Section 3.13.4 - Table 10, On-Site Collection Area).
b) Door widths: *"Doorway a minimum 2.5m"*.
c) *"A maximum grade of 7% (or a maximum grade of 3% where larger bins 660L and/or 1100L are used (NSROC, Table 13)".*

The collection point provided (Fuse Architects, Ground Floor Plan, Rev A, 20.03.2025) only appears to provides a single collection area for bins. The development should provide designated collection areas for each of:

- Residential bins.
- Residential bulky waste.
- Non-residential bins.

The use of collection rooms is preferred, with boundaries implied given they need a door. This may be particularly important on the Ground Floor for odour management and general hygiene. The collection loading area may need to be washed so there should be water provision (hot and cold) and a sewer connection as in the requirements for bin storage rooms.

The collection holding rooms should be located within 2m of the collection point (NSROC, Section 2.1 Development application submission requirements) for onsite collection. NSROC (2018, Section 5.2 Highrise RFB) states, *"bin storage area shall be no more than 2metres for waste collection vehicle parking for on-site collection or temporary storage area is required."*

Non-residential waste should be stored separately to residential waste (NSROC, Section 3 Waste management considerations for all developments, Section 3.1.2 Commercial Services).

6. Bin storage area sizes

The OWMP (2025, Rev D, Table 10: Waste Room Areas) appears to provide internal sufficient space for bins and bulky waste (excluding charity waste / other recycling). However, it does not clearly demonstrate consideration of sufficient storage space for:

- The additional space needed in bin rooms for any equipment that may be required (chutes, compactors, bin lifters, bin tugs etc) above the amount of space required for bins.
- Locations for temporary holding of bins for collection within 2m of the loading area.
- Residential bulky waste room: 27m^2, whereas, required: 28m^2.

A bin lifter would be required to decant bin contents from the residential on-floor chute room cupboard bins (usually 240L) into the bulk recycling bins for collection. However, currently on-floor bins are not provided.

- It is typical that residential on-floor chute room cupboard bins are 240L bins, but this is not clear in the OWMP (Rev D).
- The OWMP (2025, Rev D, Section 5.4.1-Residential General Waste and Recycling Disposal Procedures) states *"The general waste will discharge from the chute into 660L bins on linear tracks and the recycling will discharge into 1,100L MGBs on linear tracks in the Chute Discharge Rooms located on the basement."*

7. Chute rooms and bin cupboards on each residential level

The architectural plans show dual chutes for waste and recycling.

- However, the waste chute hoppers should be located in a waste cupboard, which also has space for additional bin(s). This is required in the WDCP 2023 NSROC (2018, p 46) and a recycling bin (in addition to any recycling chute proposed) serves to assist in the case of a bin for cardboard recycling that cannot be placed down the chute (which is a large portion of Council's recycling), back-up for the recycling chute and to future proof the development in the case of food organics collection. The OWMP (Rev D, Section 5.4.1) notes that cardboard or large containers cannot be placed down the chute:

"Cardboard boxes or large containers should not be disposed of in the recycling chute. These items should be disposed of directly into the collection bins in coordination with the building manager". Bins need to be provided on each residential level.

- NSROC (2018, p48) also notes regarding the chute entry that *"Waste disposal points must be located on the corridor of each floor directly adjacent to the recycling cupboard and no more than 30m travelling distance from each dwelling".*

8. Internal residential waste

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

9. Waste storage conditions and amenities

The proposal mentions *"All passageways facilitating the movement of bulky waste items should be at least 1,500mm wide and doorways at a minimum of 2.5m wide"* (OWMP, Rev D, Section 14.0 Waste rooms), which clearly shows that all of the required conditions and amenities for communal bin storage areas (e.g. NSROC 2018, Section 3.10.3, Table 8) have been met, including location, drainage, taps and aisle width, access, door widths of a minimum of 2.5m (2,500mm) wide. These should be shown on the architectural plans.

10. Construction and demolition waste plan

It is noted that the EIS (ref, Section x) contains some information on construction and demolition waste volumes, it also notes (Urbis, 2025, Section 6.2.6. Waste Management) that "*an Operational Waste Management Plan (OWMP) and Construction Waste Management Plan (CWMP) has been prepared by Elephant's Foot for the proposal at Appendix DD."* However, the Appendix DD is only an OWMP and there was no CWMP.

A construction and demolition waste plan needs to be provided (NSROC 2018, Table 1, Construction and Demolition Waste Management Plans) that addresses at least the following items:

- Estimated weights of waste to be generated during demolition and construction as well as the volume supplied (including any excavation material);
- An estimate of the percentage of waste that will be reused or recycled as well as disposed, targeting an 85% recovery rate (demolition may realistically will have a general waste fraction but none is supplied).
- Clear evidence of the method(s) used to calculate expected waste generation (such as an excavation plan);
- Nominated landfill facilities (if any), as well as recycling facilities (provided), by waste type; and
- Plans showing the location of onsite waste facilities during the demolition and construction phases, including vehicle access.

11. Additional comment

The EIS (Urbis, 2025, Section 5.1.2 Agency Stakeholders) states the following:

> *Waste Management - The required waste streams, collections frequencies, and council waste truck sizes have been confirmed by the Willoughby Council waste officer by the waste consultant. Refer to the Waste Management Plan at Appendix DD.*

The SSDA exhibition represents the first opportunity Council officers have had to review the full proposal, including Council's waste section.

Waste conditions will be provided later in the SSDA process, at Response to submissions stage.