



## **AUBURN CITY COUNCIL COMMENTS**

### **MIXED USE PROPOSAL FOR 1 BURROWAY RD WENTWORTH POINT SSD 6387**

Thank you for the opportunity to comment on this proposal and the extension of time to provide our comments.

In general the principles on which the proposal is designed are supported. In particular the following are supported as they provide improved amenity and pedestrian permeability through the site.

- internal walkway and its activation;
- park/plaza spaces;
- the amphitheatre.

The inclusion of some affordable housing is also strongly supported.

However, Council also has a number of key concerns in relation to the proposal. These are outlined below.

#### **CONTAMINATION**

1. It is noted that remediation is proposed to be 'excavate and dispose' (3 levels below ground). It is noted that remediation for all other sites within Wentworth Point is based on the cap and fill option.
2. It is noted that contaminants were only found in specific hotspots. Given the extent of contamination found generally in Wentworth Point this is surprising. Was the depth of the boreholes adequate to assess the soils to be removed for 3 levels of basement parking?
3. The RAP recommends an environmental management plan be prepared. This should be included in the proposal, prior to any consent.
4. It is unclear where the excavation of contaminated material would stop. What is proposed for the area of the roads? If this is cap and fill, the RAP must deal with the need for the road to include excavation from time to time.
5. Groundwater entering the basement drainage area is proposed to be pumped out. This is likely to be contaminated, but has not been addressed in the proposal or associated studies. Details of measures proposed to treat this water to acceptable water quality standards are required.

6. It is understood that basement pump-outs require the approval of the Office of Water. Advice from the Office of Water should be sought in this regard, noting the likelihood of the groundwater being contaminated.
7. Any consent should require and proposed disposal of contaminated soils or water in line with the requirements of the Office of Environment and Heritage, EPA.
8. A peer review of the remediation and groundwater strategies is strongly recommended.
9. Any consent should require an accredited site auditor to certify the remediation of the site.
10. Acid Sulphate Soils. Council has no knowledge of conditions which allow acid sulphate soils to '*naturally neutralise*' as referred to in the proposal. Again, are the boreholes sufficiently deep to assess the soils to be removed for 3 levels of basement parking? A peer review of the Acid Sulphate study and Management Plan is recommended.

## **CONTRIBUTIONS**

11. Council seeks advice on the level of contributions likely for this site. There is a clear nexus between the works proposed and the resulting need for infrastructure within the Wentworth Point area, including community facilities, library, roads and intersections. Most of this is Council infrastructure.
12. Contributions should be retained by the Department of Planning and Environment or transferred to Council for this infrastructure.
13. Council requests a meeting with SOPA and the Department of Planning and Environment to discuss the apportionment of contributions to required local and regional infrastructure.

## **WATER TABLE**

14. Given that the water table is only about a metre below ground, and the proposal includes 3 levels of basement parking, Council seeks consideration of the impacts on the water table.

## **GEOTECHNICAL ASSESSMENT**

15. This assessment is based on a single level of basement parking only, with a depth of RL -0.02, at one metre below the water table. However the architectural plans show that three basement levels are proposed to be constructed, with the lowest level at RL -6.90. This level is 7.8m below the water table. The Geotechnical Assessment should be revised on the basis of the architectural plans.

## **FORESHORE LAND**

16. It is noted that the foreshore area is not included within this proposal. Council seeks information on the plans and timing for this critical link between the two components of the urban activation precinct.

## **TRAFFIC MANAGEMENT**

17. The traffic and transport study states on p. 30 that the site is inconvenient from a public transport perspective. Council agrees. However, this is inconsistent with the approach taken by the rest of the study (eg. p.13 s.2.6) which justifies traffic and parking reductions based on proximity to public transport.
18. The study does not address the cumulative impacts on the regional road network from the additional development. This development should contribute to the required upgrades identified in broader studies for these growth areas north of Parramatta Rd.
19. The road network must be designed to be accessed by a 14.5m coach for occasional services. Details should be incorporated in the design.

### **ROADS**

#### **Eastern Road beside School**

20. The landscape plan shows the eastern road as a future road. Another plan shows a temporary road to the north, with a cul de sac at its end.
21. It is critical that this road be built in time for the opening of the school, planned for the beginning of 2017. Its construction must be included as part of this development.
22. The plans also show a 3m wide section of this road (road verge) on the school site. Council's representative on the Project Control Group for the school advises that the Department of Public Works has stated that the school boundary is the SOPA boundary, and that the road carriageway will be fully provided within the SOPA site.
23. From a practical on-going management standpoint the road should be in single ownership. It is critical that Urban Growth, DEC and SOPA meet to resolve this issue.

#### **Hill Road**

24. Similarly, there is no footpath area beside the bus bay proposed on Hill Rd adjoining the development. This would leave the road verge to be created by the adjoining urban activation precinct. This is not included in any of the concept planning for the UAP. The road and its verges should be totally within the SOPA precinct.

#### **Road widths**

25. The road widths are inadequate. On street parking is shown at 2.1m. 2.3m is required in accordance with the relevant Australian Standards.

#### **Ring road**

26. Any consent must require that the complete ring road (including the new eastern road) be completed prior to the commencement of use for retail or residential purposes.

#### **Road dedication**

27. It is not clear whether the roads are proposed to be dedicated, and if so, whether to SOPA or to Council.
28. Council will not accept the dedication of roads that contain any development underneath, or the dedication of roads that do not include the complete road reserve.

### **PARKING AND LOADING**

29. For the residential area only 246 car parking spaces are proposed for 256 units. This is inadequate and according to the EIS does not even meet the minimum standards of the SOPA masterplan. The masterplan rates were designed with the intent to reduce car

use due to the proximity of the railway station. This does not apply to this site. While there is access to the ferry, public transport accessibility cannot be considered to be similar to the rest of the SOPA site.

30. Note that the parking details shown on the traffic report (page 29) are different to the planning report (page 46).
31. At a minimum the SOPA standards should be met. However, given the constant complaints about parking that Council receives from residents of Wentworth Point, and the very real parking issues experienced by residents and visitors to this area, it would be more appropriate to use the same parking provisions as those in the draft Wentworth Point DCP (as amended and being finalised currently by the Department of Planning and Environment) or Council's DCP.
32. The number of bicycle spaces does not meet the requirements of the Sydney Olympic Park Masterplan, with only 146 provided, rather than the 481 required by the masterplan (page 29 of Traffic report). Further, the planning report (page 55) – *Transport management* states that the occupants will use cycles to access the major events in Olympic Park and also relies on the future use of Homebush Bay bridge. Given the prominence given to cycling in the transport study, bicycle parking in the proposed development should, at a bare minimum, meet the requirements of the masterplan.
33. The submitted traffic report indicates that there will be two loading bays (HRV & MRV) for the retail area. The submitted plan does not indicate the two loading bays. Two loading bays should be shown on plan with appropriate turning circles to ensure that both can function independently.
34. In addition to the major retail, loading bay requirements for the other shops and child care facility have not been addressed.
35. The minimum head room requirement must comply with AS 2890.2.
36. Please note that Council DCP requires one loading space per 400m<sup>2</sup>.

#### **CONSTRUCTION MANAGEMENT**

37. The Construction Management Plan must address the parking of construction vehicles. The plan should ensure that no construction vehicle is kept on street waiting or parking prior to entering the site.

#### **CYCLEWAY**

38. Hill Rd cycleway
  - The current traffic management scheme line marked on ground in Hill Road is based on a Masterplan for Bennelong Parkway and Hill Road jointly prepared by Council and Sydney Olympic Park Authority (SOPA) in 2004. This scheme includes on-street bicycle lanes.
  - However, following a consultation meeting with the Wentworth Point community held in March 2012, Council decided to review the scheme proposed for Hill Road in conjunction with SOPA with a view of providing more on-street parking for residents. Council has now deferred the Hill Road Traffic Management Scheme to accommodate the impacts of increased future traffic

following a traffic/transport study to be undertaken for the Urban Activation Project proposed for the Maritime Land in Burroway Road.

- In the interim, Council has prepared plans for a proposal to remove the on-street bicycle lanes and to provide parking on both sides of Hill Road. This matter may be included in August Councillor briefing.
- The final configuration of Hill Rd will depend on the recommendations of the broader traffic and transport study to be undertaken for the UAP.

## **BUILT FORM**

39. The mix of materials, lack of setbacks on 3 streets, and proposed colour mix result in increased perceived bulk and scale of the development. This is despite the quite good separation, ground level open spaces and links. It is acknowledged that the perforated screening will not have the same impact as shown on the images, however, consideration of measures to reduce this impact is recommended. These include compliance with the height and FSR controls, reduced street wall heights, more recessive colours and articulation at the higher levels and /or improved configuration of materials, finishes and colours.
40. Council does not support the lack of awnings on the northern edge to the foreshore. These awnings are required by the SOPA Masterplan and should be included in the planning:
- for summer and winter protection,
  - for noise minimisation to residences above, and
  - due to the potential attractiveness of this area for outdoor dining.
41. The through-site link provides good active frontages from the retail premises. However, concern is expressed about the streetscape, in particular on the western and eastern streets. A clause requiring active frontages to all streets is requested.

## **PROPOSED DENSITY AND UNIT MIX**

42. Council is pleased that the proposal includes 7 units of affordable housing.
43. SEPP 65 requires a mix of unit sizes. The proposed mix has too few larger units suitable for families. Given that this site is the closest site in Wentworth Point to the school (and the ferry wharf), it is recommended that consideration be given to increasing the number of 3 bedroom and family sized units.

## **WATER MANAGEMENT AND FLOODING**

44. The submitted report indicates that the adopted PMF flood level is 2.30m AHD, however, Council's information shows the PMF flood level is 2.41m AHD. This has significant design implications and needs to be addressed.
45. The impacts of a development should be mitigated within the site, rather than relying on the neighbouring site. There is a strong argument for providing the overland flow path through 1 Burroway Rd.

46. The submitted documents state the overland flow path will be provided through the UAP site to the west of the 1 Burroway Rd site. The documents submitted relating to water management for the UAP were prepared in March 2014 and there has been further development on their designs. More importantly, they are only concept plans, as no DA has yet been submitted to Council in relation to the UAP. There is no certainty that the overland flow path will be provided on the UAP site.
47. If the overland flow path is to be provided within the UAP site, any consent should require an easement to be created for the overland flow route, and a deed of agreement between the two parties in relation to the construction and management of the overland flow path.
48. The intended set down adjacent to the western boundary requires a road reserve for a footpath. Again, the proposal appears to rely on the UAP to provide this. This will also affect the intended (if any) flow path.
49. Council would prefer that the footpath reserve be provided within the SOPA site, however, the inclusion of the footpath in the easement and deed of agreement discussed above would be acceptable.
50. Please note that the submitted landscape plan does not show the extent of works west of the centre median.
51. Water quality measures must be provided to the runoff generated from the road network prior to discharge to Parramatta River.
52. The submitted report states that water quality measures will be incorporated in accordance with the requirement/prescribed by the Road Authority. Council would like to know who the Road Authority will be.

## **WASTE MANAGEMENT**

53. Council has concerns about the location of the main waste handling room so close to the vehicular access to the development. Council's position is not (as stated in the EIS) that waste collection is to be on road. Rather, Council seeks on-site waste collection.

### **RESIDENTIAL**

54. Waste must be collected on site. Council has consistently applied this requirement in all recent developments in the Wentworth Point precinct. The planning report indicates that Council was consulted about this. Council does not object to collecting the garbage at street level provided:
- The collection vehicle can be within the development site while loading;
  - The collection access point to the development is via the new proposed road, and
  - A minimum 4.0 m head room is required.
55. It is noted that the ground floor level waste area does not have any manoeuvring space for bins. The bin wash area is accessible only when significant amount of bins are removed from the area. Council seeks that these matters be addressed.

### **COMMERCIAL**

56. Commercial waste collection has not been addressed in the submitted waste management plan. The commercial waste collection area must be shown on the plan. Please note that:

- The commercial waste collection facility must be separated from the residential facility;
- The facility must be easily accessed by all shops and the child care facility;
- Waste must be collected on site;
- A minimum 4.0 m head room is required.

## **ESD**

57. It is noted that the score card for the commercial area only seeks to achieve a 4 star Green Star rating. This is inconsistent with the requirement for best practice ESD in the Director General's Requirements. The use of the Green Star communities rating tool is recommended. In any event, a minimum of 5 star Green Star for a project in such an iconic site should be required. Given the scale of the proposal and its location on a prominent part of the foreshore, and therefore its value as an example, a much higher rating is desirable.
58. Note that many sites with 5 or more Green Stars in Melbourne display this feature in their advertising as a marketing tool.

## **BIODIVERSITY**

59. It is noted that the recommendations of the ecological report by Biosis that supported the proposal for the Urban Activation Precinct surrounding this site, recommended:
- seasonal timing of construction activities to avoid the breeding season of the White-bellied Sea Eagle , or
  - timing of construction determined though consultation with local government and Birdlife Australia.

It is recommended that consultation with Birdlife Australia and OEH be undertaken to ascertain the need for similar measures for this site.