



Kylie Rourke - 97100535  
File Ref: DN13/0006

11 April 2013

NSW Department of Planning & Infrastructure  
**ATTN: Mark Brown**  
GPO Box 39  
SYDNEY NSW 2001

Dear Mr Brown

**Re: Submission, Part 3A Major Project MP10\_0230 Woollooware Bay Town  
Centre Stage 1 - Retail/Club Precinct**

Thank you for the opportunity to comment on the Environmental Assessment for the above stage 1 detailed proposal.

Council accepts that the development has concept approval and is supportive of the scheme going forward.

Council would, however, like to take this opportunity to raise a number of concerns regarding the detailed design scheme. Council does not consider that the proposal has genuinely considered nor satisfactorily addressed the terms of the concept approval. Council's concerns stem from fundamental weaknesses in the design that are a consequence of an introverted design, which results in a poor relationship to the public domain and the natural environment.

The Sharks site is a landmark site that provides an opportunity for the adoption of best practice environmental design and high quality connections to the public domain. The site is geographically isolated and the proposed internalised design further isolates the development from its surrounds, resulting in a poor connection to the immediate and greater context.

Design ingenuity is required to overcome the various site constraints and to take advantage of opportunities, such as the site's natural amenity and sporting facilities. The design scheme is a fairly typical internalised shopping mall that only connects to the outside around the entry on Captain Cook Drive and adjacent the dining area at the rear. This approach is not considered to exhibit the design ingenuity or excellence called for by the Planning Assessment Commission (PAC).

The proposal has flaws in terms of the treatment of the riparian zone, implementation of environmental sustainability measures, frontage activation, visual and pedestrian permeability, and lack of encouragement of non-car based travel options. Key elements of the proposal fail to demonstrate that the proposal will be a successful, integrated and functional town centre. The design philosophy fails to achieve an acceptable balance between economic goals and environmental/social impacts.

Please find attached a detailed planning report that provides a summary of the key concerns Council has regarding the development. Council requests the proposal be amended, consistent with the recommendations of the planning report, and be resubmitted for review and comment by Council.

In addition to the report recommendations, at its meeting on 8<sup>th</sup> April 2013 Council also resolved the following also be considered by the Department:

- That a traffic study and a report be prepared by the proponent and provided to Council to include Captain Cook Drive, Gannons Road, the Kingsway, Woollooware Road north, Elouera Road and Denman Avenue to further assess traffic impacts;
- That a permanent shuttle bus service be provided until there is public transport in place to Woollooware Station (the applicant's submission does not specifically identify Woollooware Station, which is the closest train station to the site); and
- That parking on game days be restricted to the proponent's parking area. Council does not give permission for use of the Wanda parking area at Don Lucas Reserve for overflow.

The report from Councils Architectural Review Advisory Panel (ARAP), which considers the architectural merit of the proposal, has also been enclosed for your reference. In its report, the Panel concludes that the proposal is flawed in its conception and does not satisfy the clear environmental assessment requirements relating to built form, ecologically sustainable development, public domain and landscaping.

Although Council has expressed concern about adequate parking being provided, it may be prudent to sacrifice a small number of car spaces to provide opportunities for better connection to the public domain, a better level of amenity, and greater energy efficiency by adopting some of the ARAP's suggestions.

I trust that this information is of assistance. Council looks forward to the opportunity to comment on any modifications to the proposal and is happy to provide any additional information or technical expertise that might assist in the Department in the assessment of the application.

If you need more information please do not hesitate to contact Council's Development Assessment Officer - Kylie Rourke on 02 9710 0535.

Yours faithfully



Peter Barber  
Manager- Coastal Assessment Team  
for J W Rayner  
General Manager