

Response to Submissions and Preferred Project Report

Woollooware Bay Town Centre

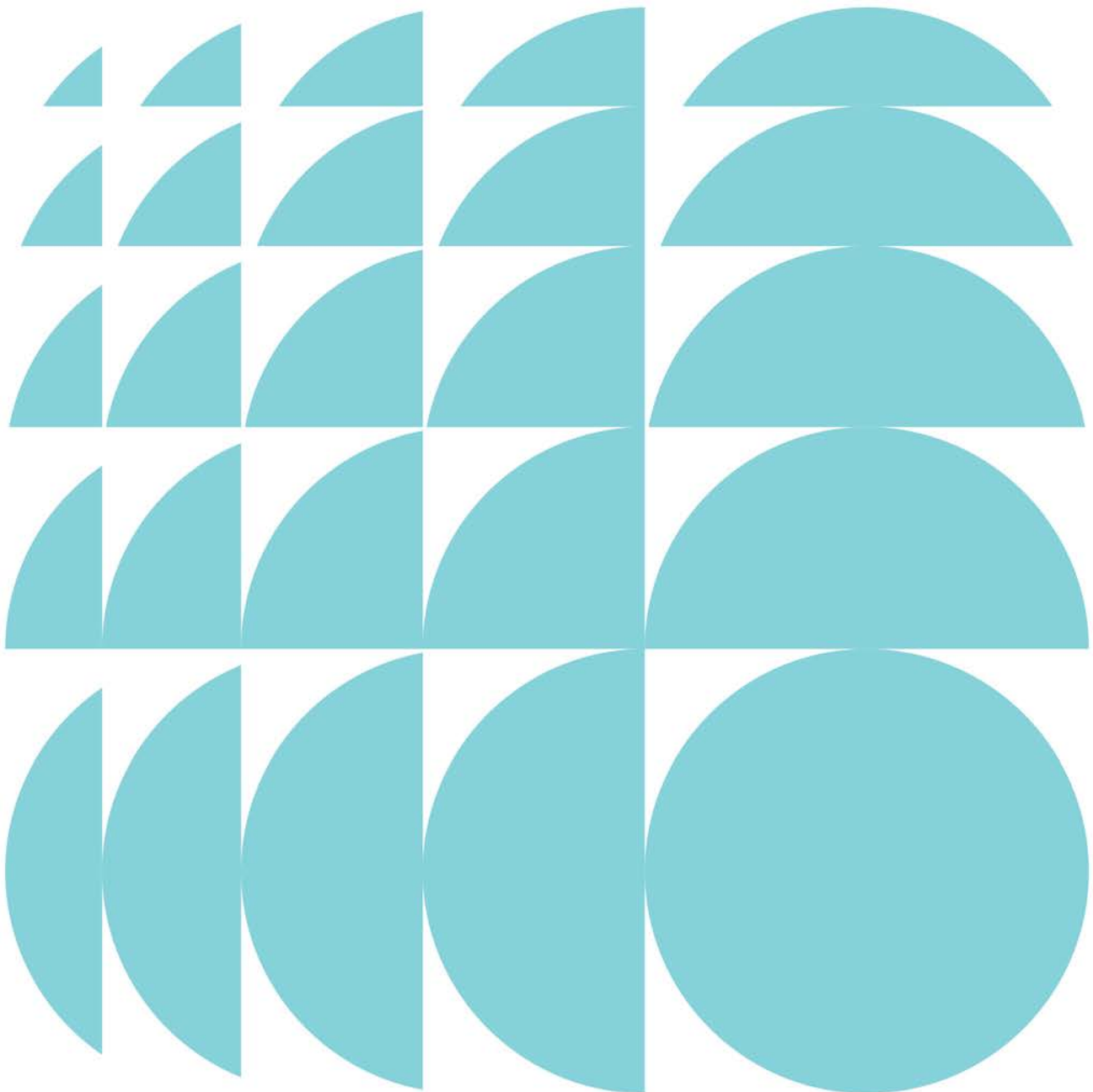
461 Captain Cook Drive,
Woollooware NSW 2230

Concept Plan MP10_0229 MOD 2 and Project
Approval MP10_0230 MOD 7

Submitted to NSW Department of Planning
and Environment

On behalf of Bluestone Capital Ventures No.1

10 October 2017 | 14352



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Executive Summary

Purpose of this report

This submission to the Department of Planning and Environment (the Department) comprises a Response to Submissions and Preferred Project Report made in response to comments received from the Department, State and local government agencies and the general public during the public exhibition of the Section 75W Modification Application to amend the Part 3A Concept Plan Approval (MP10_0229) and Part 3A Project Approval for Woollooware Bay Town Centre at 461 Captain Cook Drive, Woollooware.

Consultation and public submissions

The Section 75W Modification Application was publicly exhibited by the NSW Department of Planning and Environment online and at two physical locations between 9 March and 7 April 2017. During this period a total of 57 public submissions and 9 submissions by public agencies were received by the Department.

The following key issues raised in submissions were identified as requiring a response or clarification:

- Urban design and building form.
- Traffic and parking.
- Public benefits.
- Community consultation.
- Biodiversity impacts.

These matters are addressed in this Response to Submissions.

Revisions to exhibited Section 75W Modification Application

In response to feedback by the public and government agencies, the proponent has amended the masterplan to respond to issues including built form, public benefit and parking. This has necessitated a number of changes to the exhibited Modification Application, including the following key amendments:

- Reduce the height in storeys of Building B from 16 storeys to 15 storeys.
- Increase the height in storeys of Building C from 11 storeys to 12 storeys.
- Increase the height of Building E from 8 storeys to 10 storeys and provide two additional levels of dedicated hotel car parking within the hotel building envelope (Building E), providing an additional 91 parking spaces.
- Increase in number of apartments from 222 to 244 to accommodate the proposed affordable housing initiative.
- Reduction in the number of hotel rooms from 125 to 75 keys.
- Increase in car parking spaces from 1,078 to 1,170 spaces.
- Provide additional bicycle parking spaces at ground level on Captain Cook Drive and on Level 5 and Level 6 within the retail car park.

Environmental Assessment

Urban design and building form

The Preferred Project described in this report makes the maximum proposed building heights consistent with those approved in Residential Stages 1-3 within the western precinct. This will provide a consistent approach to height across the entire town centre, further mitigate potential impacts associated with built form and visual impact, and ensure that a suitable built form outcome is achieved for the centre. The proposed building heights are commensurate with the high level of amenity provided within Woollooware Bay Town Centre, including immediate proximity to recreational, retail, medical and leisure services, new public and active transport connections and a high quality living environment. The proposed building envelopes provide for appropriate levels of integration and separation of different uses within the centre, whilst providing a vibrant urban environment which sets a high standard of architectural design.

Traffic and parking

The Preferred Project provides for an increase in parking spaces provided within the centre and includes a commitment to providing 4 car-share spaces (GoGet or similar) to further reduce the demand for car ownership and parking. Traffic impacts as a result of the proposed modification are expected to be minimal in the context of existing flows and approved development. Traffic impacts were assessed as part of the approved Concept Plan and Club / Retail Project Approval, and the addition of residential development would contribute to only an additional 4.2% in weekday traffic and 1.2% in weekend traffic from the centre. Overall, the approved retail centre will continue to be the primary generator of traffic within the centre with new infrastructure to be implemented accordingly.

Public benefit

Following further consultation with Sutherland Shire Council, Capital Bluestone has revised its commitment to delivering additional public benefits in conjunction with the proposed modification to better meet the needs of the existing and future community. Specifically, the revised public benefit offer entails:

- \$1.4 million financial contribution to Sutherland Shire Council for the implementation of new cycleway connections and upgrades to improve the accessibility to and from Woollooware Bay Town Centre to other nearby centres including Woollooware Station and Cronulla; and
- Housing Affordability Initiative, comprising:
 - 5% of the proposed residential floor space to be retained under private ownership as affordable rental housing for a period of ten years following occupation;
 - 5% of apartments to be reserved for first home purchasers, with a reduction in the initial deposit required to help new buyers enter the market sooner.

These proposed public benefits would be over and above the Council's local infrastructure contributions payable for local open space, community facilities and infrastructure upgrades.

Conclusion and recommendation

This Modification Application provides a significant opportunity to create a vibrant new centre, increase housing supply within the locality and make efficient use of new public transport and services provided within the Woollooware Bay Town Centre. The amendments to the exhibited Modification Application provide for an improved built form outcome with reduced visual impact, provide for significant additional public benefits including apartments for affordable rental housing and first-home buyers, and reduces potential car parking impacts by providing additional on-site car parking and committing to car-sharing to reduce overall levels of car ownership within the site. In light of the substantial benefits of this Modification Application, we have no hesitation in recommending the approval of this project.

1.0 Introduction

Section 75W Modification Applications to the Concept Approval (MP10_0229) and Project Approval for the Eastern (Retail/Club) Precinct (MP10_0230) at Woollooware Bay Town Centre were submitted to the NSW Department of Planning and Environment (the Department) in February 2017 and publicly exhibited for a period of one month between 9 March 2017 and 7 April 2017.

The proponent, Bluestone Capital Ventures No.1 and Cronulla Sutherland Leagues Club, and its expert consultant team have reviewed and considered the comments by the Department of Planning and Environment, public agencies and the public submissions and, in accordance with schedule 6 and clause 75H(6) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), has responded to the issues raised. This Preferred Project Report (PPR) sets out the proponent's response to the issues raised and details the final proposed modifications to the Concept Plan and Project Approval for which consent is now sought.

In total 57 public submissions and nine local and state government agency submissions were received in response to the public exhibition of the Modification Application. The following key issues were identified as requiring a response or clarification:

- Urban design and building form, including building height, visual impact and design principles for subsequent stages of development;
- Transport, including public transport, parking provision and traffic generation;
- Public benefits, including housing affordability measures;
- Community consultation; and
- Biodiversity impacts.

The Department reviewed the submissions received during the exhibition period and wrote to the proponent on 28 April 2017 outlining the key issues raised during the exhibition period requiring clarification or additional information.

This report should be read in conjunction with the Amended Architectural Drawings and Architectural Design Statement prepared by Turner, the exhibited Section 75W Modification Application by JBA (now Ethos Urban) and supporting materials, and the original Concept Plan Approval and Project Approval.

2.0 Summary of Submissions

2.1 Approach to General Public Submissions

Each submission from a member of the general public, including local residents, local or special interest groups, and other interested persons has been summarised. Because a large number of submissions raise similar issues, rather than addressing each submission individually, the issues raised in submissions have been summarised in **Section 2.2.1** below.

A detailed response to the issues raised in public submissions is included at **Appendix D**. The issues are organised by category, providing a description of the various issues raised and the number of times each issue was raised.

2.2 Analysis of Public Submissions

This section provides an understanding of who has made submissions as well as a brief analysis of the numerical significance of issues raised in submissions from the general public. This analysis has not been carried out to discount issues that are raised within fewer submissions, but is intended to help the decision makers understand which issues are of more concern to more people. A breakdown of public submissions is provided at **Appendix D**.

In total, 57 public submissions were received during the exhibition period for the Section 75W Modification Application of which only 25 objected to the modification. No petitions were received. In comparison, the original Concept Plan Application attracted almost 4,500 submissions.

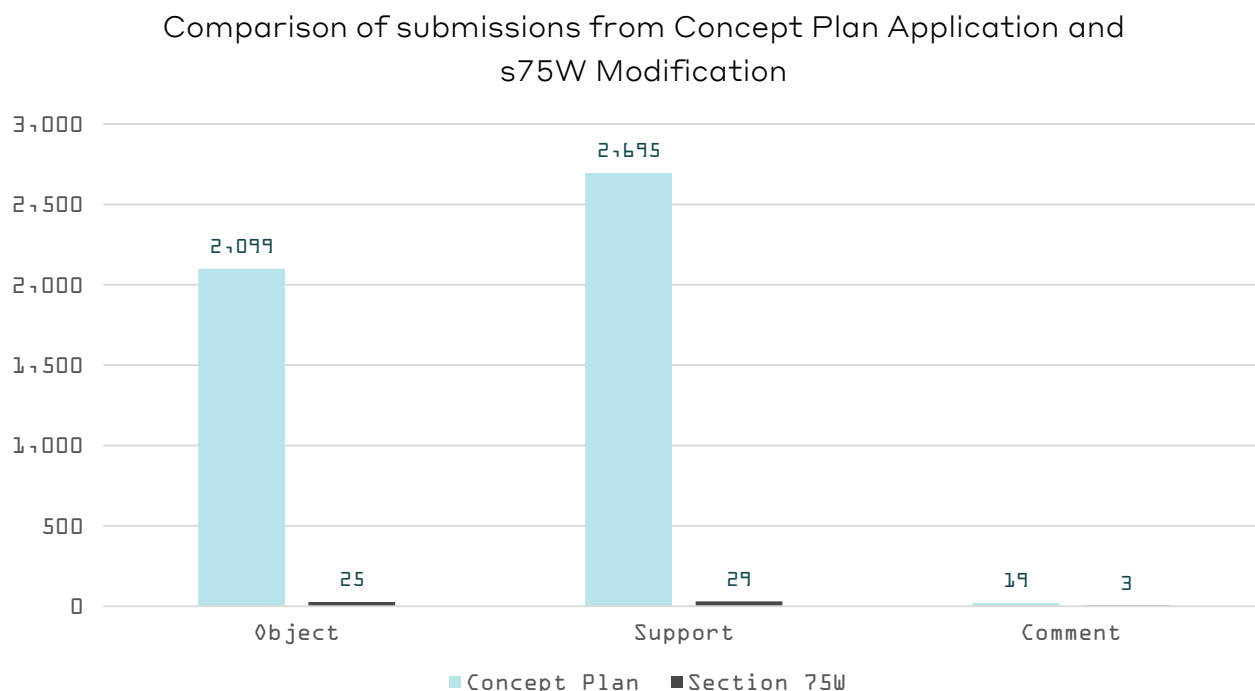


Figure 1- Comparison of submission from Concept Plan Application and S75W Modification

Source: Ethos Urban

2.2.1 Analysis of Issues Raised

Ethos Urban has analysed the submissions received from the general public in response to the public exhibition. In summary:

- A total of 57 submissions were received.
- A total of 29 submissions supported the proposal, 25 objected and 3 made comments.
- Submissions were received from members of the public who lived worked or owned property in the vicinity of Woollooware Bay and the wider Sutherland Shire, or are supporters of the Cronulla Sharks Leagues Club.

Together, these submissions raised a variety of issues including traffic and parking impacts, environmental impacts, capacity of local infrastructure, as well as a range of social and economic benefits as a result of the development. The following were the five most commonly raised issues:

- Traffic;
- Building form;
- Character and amenity of the local area;
- Parking; and
- Capacity of the local infrastructure.

A detailed response to the issues raised by the general public has been provided at **Appendix D**.

Table 1 below provides a summary of the issues raised in the public submissions received during the exhibition period.

Table 1- Summary of public submission by issue raised

Issue	Total	Object	Support
Traffic	25	23	2
Building form	24	18	6
Character and amenity of the local area	21	15	6
Parking	18	18	0
Capacity of local infrastructure	18	18	-
Tourism accommodation	17	-	17
Affordable housing	13	9	4
Environmental impacts	12	12	-
Scope of modification application	11	11	-
Loss of playing fields	9	9	-
View loss	8	8	-

Issue	Total	Object	Support
Community facilities	8	-	8
Cronulla Sutherland Sharks Leagues Club Financial Position	7	7	-
Community consultation	6	6	-
Adequacy of Notification	6	6	-
Alternative transport options	6	2	4
Economic benefit	6	-	6
Support sports clubs in the area, including Cronulla Sutherland Sharks Leagues Club	5	-	5
Noise	2	2	-
Overshadowing	1	1	-
Electromagnetic radiation	1	1	-
Construction impacts	1	1	-

2.3 Submissions by Public Agencies

As highlighted earlier in this report, nine submissions were received from government agencies and authorities in response to the exhibition of the EAR. Specifically, responses were received from:

- Airservices Australia.
- Department of Primary Industries (DPI);
- Environment Protection Authority (EPA);
- Office of Environment and Heritage (OEH);
- Roads and Maritime Services (RMS);
- Sutherland Shire Council;
- Sydney Airport;
- Sydney Trains; and
- Transport for NSW (TfNSW).

A number of these agency submissions simply involved the respective agency advising that they had no comment on the application or providing guidance on recommended conditions. These included the submissions from Airservices Australia, DPI, EPA, OEH, RMS, Sydney Airport, Sydney Trains and TfNSW.

Sutherland Shire Council has provided two submissions on the proposed modification. The first submission prepared by Council officers was issued on 20 April 2017 and offered comments in support of the project.

Following the provision of Council's first submission, a number of Sutherland Shire Councillors moved at the Council meeting on 19 June 2017 to rescind the original submission prepared by staff and make a new submission. The second submission formally objects to the proposed modification and states that Councillors do not support the proposed residential component above the approved retail centre. As a result, a subsequent submission from Council was issued on 10 July 2017.

A detailed response to all issues raised in agency submissions, including the Department's issues letter, is provided at **Appendix E**.

3.0 Preferred Project

The Proponent has reviewed the Issues Letter by the Department, submissions by Sutherland Shire Council, public agencies and the general public. In response to these submissions, the Proponent has made a number of amendments to the proposed Modification Application dealing with the built form, car parking provision and the public benefit offering associated with the application. These changes are described in **Section 3.1**, whilst **Section 3.2** provides a summary of the Concept Plan as it is proposed to be modified.

3.1 Key Changes to Exhibited Modification Application

The application seeks to modify the approved Concept Plan in order to facilitate the development of new hotel/visitor accommodation and residential flat buildings above the approved Retail/Club podium and to deliver a new Cronulla Sutherland Centre of Excellence attached to the existing Western Stand of Southern Cross Group Stadium.

3.1.1 Amended Building Heights

To address matters relating to building height raised by the Department and Council, building heights across the site have been amended to improve consistency in the built form between the eastern and western precincts. The maximum height proposed within the eastern precinct is 15 storeys, consistent with the maximum height of buildings in residential Stages 1, 2 and 3. Specifically:

- The height of Building B (residential) has been reduced from 16 storeys to 15 storeys.
- The height of Building C (residential) has been increased from 11 storeys to 12 storeys.
- The height of Building E (hotel) has been increased from eight storeys to 10 storeys in order to accommodate two additional levels of parking.

This is illustrated in **Figure 2**.

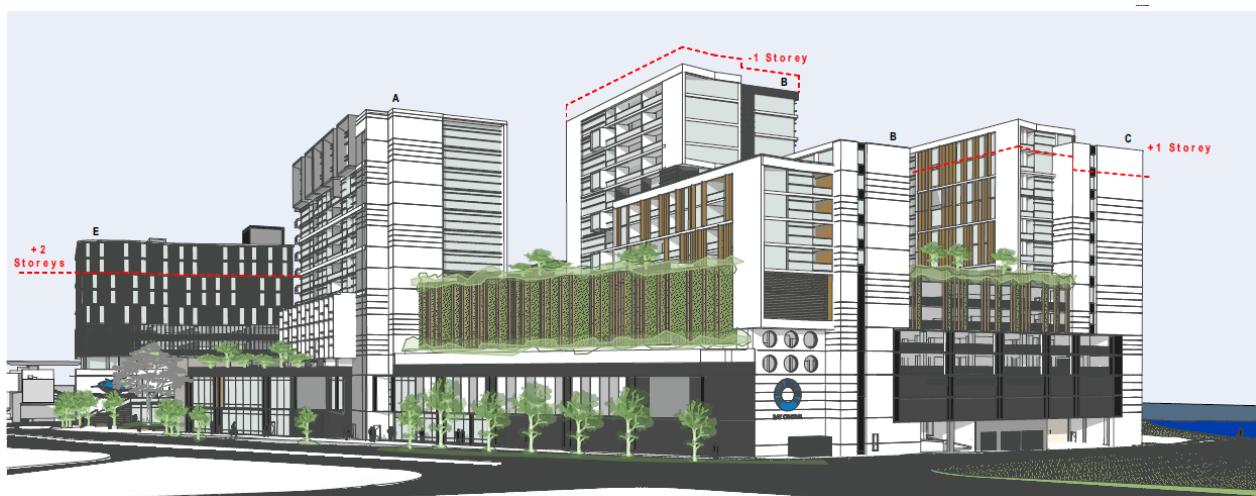


Figure 2- Amendments to exhibited building heights and indicative envelopes

Source: Turner

3.1.2 Amended Hotel and Car Park Design

In order to respond to matters raised by Council, it is proposed to amend the hotel (Building E) envelope to provide additional dedicated car parking, improve the viability of the hotel and facilitate the housing affordability package outlined in **Section 3.1.3** below.

Council's submission stated that *"there may also be value in the hotel having access to its own parking spaces within the hotel building footprint accessed from the upper level internal road as a means of potentially increasing parking numbers, but more importantly making the arrival sequence simpler for visitors"*. The Proponent has reviewed Council's suggestion and agrees that there is merit in this approach. Accordingly, it is proposed to include two levels of dedicated hotel parking within the lower two levels of Building E, providing a total of 91 parking spaces for use by residents, hotel staff, visitors and guests. Of these 91 spaces, 22 are for use by residents in a secure area. As a result of the proposed changes, the maximum height of Building E is proposed to be increased from eight storeys to 10 storeys. Due to tolerances provided in the detailed building envelope, this increase in height only equates to an increase of RL 6.3.

In order to facilitate the affordable housing component of the Public Benefit Offer described in **Section 3.1.3** below, it is proposed to convert the upper two levels of the hotel into residential apartments. This amendment will result in the hotel being reduced from 125 rooms to 75 rooms. This level of visitor accommodation provision is considered to be a more economically sustainable provision based on expected occupancy rates throughout the year.

Council's submission notes that it supports the provision of tourist and visitor accommodation on the site and requests that *"there be conditions requiring it [the hotel component] to be used as such in perpetuity"*. The Proponent accepts this recommendation and has suggested an appropriate condition in **Appendix C**.

3.1.3 Public Benefit Offer

Following the public exhibition period the Proponent has held further discussion with Sutherland Shire Council staff regarding the potential public benefits which are able to be facilitated by the proposed modifications to the Concept Plan. Initial discussions canvassed a range of potential cycle infrastructure upgrades to be carried out by the Proponent. At Council's request, it is now proposed that, should the modification be approved, to make a direct financial contribution to allow Council to carry out these works, comprising:

- Woollooware Bay Town Centre to Woollooware Station link;
- Woollooware Station to Cronulla Centre link; and
- Connection to the Sutherland to Cronulla Alternative Transport Link.

The Proponent initially offered to undertake these works as works in kind, however Council has chosen to receive a monetary contribution.

Council's letter, provided at **Appendix G**, states that:

The three new bicycle links proposed would have the dual benefit of encouraging use of alternate transport by residents and visitors to Woollooware Bay, and thereby reducing car traffic generation, and providing a benefit to the broader community. The links cover desire lines to the

*closest railway station, Cronulla Centre and a connection to the proposed Sutherland to Cronulla Alternative Transport Link. **The three links would provide much more than recreational cycling opportunities, and are considered to be of substantial value.*** [our emphasis added]

The value of these works is anticipated to be \$1.4 million. Accordingly, it is proposed at **Appendix G** that a condition of consent be imposed should the Modification Application be approved requiring the payment of this contribution prior to the issuing of any Occupation Certificate for residential dwellings within the eastern precinct.

In addition to Section 94 contributions, the Proponent also initially raised the potential to make an affordable housing contribution to Sutherland Shire Council, in response to the matters raised in the Department's letter of 28 April 2017. However, Council has advised that it has no housing affordability policy to require such a contribution and that *"these respond to requests by the State Government, and Council would have no role in the delivery or ongoing administration or management of these elements"*. Housing affordability was raised in only 13 public submissions on the Modification Application.

We note that the NSW Department of Planning and Environment does not currently have a housing affordability policy which would apply to the proposed Concept Plan Modification, nor was housing affordability identified as a matter to be addressed in the Secretary's Environmental Assessment Requirements for this project. Notwithstanding this, the Proponent is willing to commit to a voluntary affordable housing and first-home buyer initiative that could be incorporated into the proposed development. Specifically, this offer proposed the following:

- 5% of residential floor space proposed under this modification to be provided as affordable rental housing (20% discount on market rates) administered by an approved affordable housing provider for a period of no more than 10 years following occupation but otherwise privately owned; and
- Reserving 5% of apartments within Stage 4 for first home buyers, which can be purchased with a reduced deposit amount of 5%.

The affordable housing package would ensure that approximately 10-12 apartments are retained as affordable rental housing for low, low-moderate and moderate income households for a period of ten years¹, whilst a further 10-12 (approx.) apartments are reserved with a discounted deposit to provide a pathway for first home buyers to enter the housing market. Affordable rental dwellings would be distributed throughout the Stage 4 apartment buildings.

Following on from discussions with Sutherland Shire Council, the cycleways financial contribution and housing affordability initiative would replace those public benefits previously included in the Modification Application (bike share scheme and community rooms) with the exception of the car share scheme. Local development contributions will continue to be payable.

¹ As defined in Section 6 of the SEPP (Affordable Rental Housing) 2009.

3.2 Description of Final Modification Proposal

The proposed modifications described above should be read in conjunction with the description of the proposed modifications to the Concept Plan contained in the Section 75W Modification Application dated February 2017. **Table 2** provides a summary of the key changes between the exhibited and amended Section 75W Modification Application, whilst **Figure 3** illustrates the master plan as amended in this revised submission.

In summary, the proposed modification to Concept Plan MP10_0229 (as amended) seeks to:

- Expand the range of land uses within the eastern precinct to provide a more comprehensive town centre with residential apartment buildings and tourist and visitor accommodation to complement the retail, club and community facilities already approved.
- Amend key development parameters in relation to the Concept Plan, including:
 - Amending building envelopes for the eastern precinct to allow two additional levels of car parking above the podium, and six buildings ranging between 8 and 15 storeys (including podium);
 - Increase the maximum GFA to 65,307m² (including Centre of Excellence);
 - Increase the maximum GBA to 136,857m² (including Centre of Excellence); and
 - Increase the number of car parking spaces within the eastern precinct from 770 spaces to 1,170 spaces.
- Allow for the following development within the proposed building envelopes:
 - Serviced apartment/hotel building providing 75 keys.
 - Three residential flat buildings and a small number of terrace houses comprising approximately 244 dwellings and associated.
 - Landscaped podium with private communal open space, a resident's community space and swimming pool.
- Establish a building envelope and range of land uses for a new Sharks Centre of Excellence attached to the existing western (ET) grandstand of Southern Cross Group Stadium.
- Amendment to the landscape master plan to provide for the additional land uses.

The proposed master plan and revised building envelopes are detailed in full in the Turner drawings and design report provided at **Attachment A**. The proposed changes to the Concept Plan (as amended) will necessitate a number of modifications to the current terms in the Instrument of Approval. The changes necessitated by the proposed modification are set out in **Attachment C**.

Table 2- Summary of key changes between exhibited and amended Modification Application

Metric	Exhibited	Preferred Project	Change
Gross Floor Area (GFA)			
Retail and Club	28,002m ²	28,002m ²	No change – As per CP Mod 7
Hotel& Regional Accommodation	8,149m ²	4,452m ²	-3,697m ²
Residential	23,508m ²	25,552m ²	+2,014m ²

Metric	Exhibited	Preferred Project	Change
Centre of Excellence	7,793m ²	7,300m ²	-493m ²
Total	67,452m ²	65,306m ²	-2,146m ²
Car Parking (indicative – subject to dwelling mix)			
Residential Parking	258	281	+23
Retail Parking	770	770	No change.
Hotel Parking	0	69	+69
Centre of Excellence Car Park	50	50	No change.
Total Car Parking	1,078	1,170	+92
Dwellings (indicative – subject to dwelling mix)			
Building A	76	76	No change.
Building B	80	74	-6
Building C	59	65	+6
Building D	7	7	No change.
Building E	0	22	+22
Total Dwellings	222	244	+22
Hotel			
Total Rooms	125	75	-50



4.0 Clarifications

4.1 Community Consultation

A revised Community Engagement Outcomes Report prepared by Straight Talk is provided at **Appendix H**, which details overall approach to community engagement throughout the development of Woollooware Bay as well as the community consultation that has been both prior to and following lodgement of the Modification Application.

Pre-lodgement engagement included advertising and distribution of notification materials to the local community as well as two 'Display and Discuss' sessions held at the Cronulla Sutherland Leagues Club. Specifically:

- A 'Display and Discuss' session was held on 28 February 2017 for new residents and owners of Stages 1, 2 and 3 and Club members and staff. 53 people attended.
- A 'Display and Discuss' session was held on 6 March 2017 for the wider Woollooware and Sutherland community. 28 community members attended.

The 'Display and Discuss' session that was open to the general public was advertised in the following ways:

- Advertisement in the St George and Sutherland Shire Leader on 22 February 2017.
- A letterbox drop to approximately 950 residents in the surrounding area.
- A media release on 22 February 2017 and subsequent news story in the St George and Sutherland Shire Leader on 1 March 2017.
- Advertisement in the St George and Sutherland Shire Leader on 1 March 2017.

A briefing to the North Cronulla Precinct and Cronulla Residents Group was also undertaken on 6 March 2017 prior to the 'Display and Discuss' session. Six residents attended the briefing.

Feedback was collected from all 'Display and Discuss' sessions through both a formal feedback form as well as informal feedback recorded by the project team. Detail of this feedback is summarised in the Community Engagement Outcomes report at **Appendix H**. Both positive and negative feedback was received at the sessions, with a key focus on:

- Positivity about future development, particularly a hotel and shopping centre.
- Traffic congestion and parking.
- Public transport usage.
- Capacity of the local school and other infrastructure.
- Impact on RAMSAR wetlands.

Following a review of this feedback, Capital Bluestone sought advice from its project team to address the concerns raised. Matters relating to traffic congestion, parking and public transport are addressed at **Section 5.2**, and the impact on ecological values of the area at **Section 5.6** and **Appendix J**.

4.2 Car Parking Allocation

The breakdown of car parking for each use as proposed is provided in **Table 3**. The proposed Modification Application made reference to either 1,028 or 1,078 car parking spaces and this discrepancy is due to the 50 car parking spaces dedicated to the Centre of Excellence either being included or excluded in the total number of car parking spaces. These spaces are located at ground level adjacent to the proposed Centre of Excellence, and not within the podium car park.

Table 3- Car parking allocation

Location	User Group	Car Parking Spaces
Above retail centre		
Shared Retail Car Park	<ul style="list-style-type: none"> Retail Centre Staff Visitors Visitors to residents 	770
Residential Car Park	Residents of Buildings A - D	259
Hotel Car Park	Hotel Staff Hotel Guests Residents of Building E	91 (22 spaces for residents)
Subtotal		1,120
Centre of Excellence	Centre of Excellence staff and visitors	50
Total		1,170

5.0 Proponent's Response to Key Assessment Issues

This chapter provide a response to those matters identified by the Department of Planning and Environment in its letter to the proponent dated 28 April 2017 as warranting further clarification or justification, key issues raised by government agencies (including Council) and the general public received during the exhibition period. This chapter should be read in conjunction with the assessment of planning issues contained in the Section 75W Modification Application, as well as assessment provided by the Proponent and Department in relation to the original Concept Plan Approval.

Table 4 below identifies the matters raised by the NSW Department of Planning and Environment and provides a reference to where that matter is addressed in this report.

Table 4- Response to matters identified in DP&E's 'Issues Letter'

DP&E Issue	Response/ Reference
Urban design and building form	
Consideration should be given to how the approved Stage 1 retail and club facilities could be integrated with the proposed additional uses and envelopes to enhance the town centre qualities of the development.	Section 5.1 and Design Report at Appendix B.
<p>Design principles should be developed to guide the future of development in terms of:</p> <ul style="list-style-type: none"> • Maximizing activation of external street frontages; • Providing a street address for the residential and tourist accommodation; • Minimising impacts of loading dock and car parking entry/ exit points, plant, services and above ground car parking; • Identifying and separating public and private areas; and • Managing the separate car parking and traffic impacts of the various uses, including drop off/ pick up for the tourist accommodation. 	Section 5.1 and Design Report at Appendix B.
The maximum height of 16 storeys in the eastern precinct should be reviewed, in line with the established maximum height of 14 storeys in the western precinct. In addition, the height of buildings should be reconsidered to minimise the impacts of building height and bulk at the edges of the site.	Section 5.1.1 and Amended Concept Plan Drawings at Appendix A.

DP&E Issue	Response/ Reference
Traffic and parking	
<p>Further consideration should be given to strategies and mechanisms to reduce the traffic and parking demands of the development. In particular:</p> <ul style="list-style-type: none"> • A specific commitment to providing a minimum amount of car share spaces along with justification for how this number was derived; • Retaining or reinstating the shuttle bus to Woollooware station to provide residents with a direct link to the nearest train station for services to the city and other centres on the rail network; and • A commitment to increase bicycle parking. 	Section 5.2 and Traffic and Parking Assessment at Appendix F.
A further explanation should be provided on how the Captain Cook Drive/ Gannons Road roundabout is improved from the level of service F to C in the Saturday peak.	Section 5.2.6
Further details on the management of access and parking for each of the land uses, including consideration on whether shared or separate access will be provided, ease of access for visitors and dispersion of traffic to minimise queuing on both arrival and exiting the site.	Section 5.2.5
Public benefits	
The proposal seeks a significant uplift in density and development yield than what would be otherwise permitted on the site and expected by the community. The Department considers that the uplift should be supported by community benefits in additions to Section 94 and 94A contributions.	Section 3.1.3 and Section 5.3.
The department requires that you engage with Council to determine how the proposal can contribute to services and facilities to the benefit future residents and the broader community. The outcomes of consultation should be documented to the Department, including what commitments have made in relation to community benefits and how these would be formalised (in a planning agreement or the like). Where council's suggestion for community benefits are not progressed, the reasoning and justification for this should be outlined in your response.	Section 3.1.3 and Section 5.3

DP&E Issue	Response/ Reference
Further consideration should be given to provisions of affordable housing within the development, in addition to other mechanisms to improve housing affordability and accessibility to first home buyers.	Section 3.1.3 and Section 5.3.
Community Consultation	
The consultation with the community undertaken prior to lodgement of the application was limited to club members, owners within the western precinct, Council and other agencies and special interest groups. There is no evidence of broader consultation with the general Woollooware community.	Section 4.1 and Appendix H
In addition to addressing the Department's issues and the submissions received in response to the exhibition, you must consult the broader Woollooware community to invite feedback and comments on how the proposal can be reviewed in response to their concerns. A consultation report is required outlining the issues raised and how the proposed development has been amended in response to these issues. An explanation or justification should be provided where amendments have not been made to address an issue.	Section 4.1 and Appendix H
Additional Information	
An updated Biodiversity Assessment addressing the impacts of the proposal on the adjacent mangroves and fauna, based on data collected in up to date field surveys, and any mitigation measures to minimise impacts.	Section 5.6.2 and Appendix J.
Confirm whether the proposal is likely to cause significant impacts that would constitute a controlled action under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> , including evidence of consultation with the Federal Department of Environment and Energy.	Section 5.6.1 and Appendix I.
Clarification on the proposed car parking provisions, noting that the EA states that 1,078 spaces are proposed but the Traffic and Transport Assessment states that 1,028 spaces are proposed.	Section 3, Section 4.2, Appendix A and Appendix F.
Clarification on the gross floor area proposed, noting that the EA proposes an increase of 39,520 sqm overall but only 39,450 sqm in the eastern precinct.	Section 3 and Appendix A.

A response to each of the individual issues raised by the Department and submitters is provided in the tables at **Appendix D** and **Appendix E**.

An overview of the parties who made submissions and their key issues for consideration is provided below. Other issues which require further assessment, such as assessment against statutory policies and plans, are considered at Section 5.

5.1 Urban Design and Building Form

The Preferred Project would include one 15-storey apartment building, one 14-storey apartment building and one 12-storey building. This is consistent with Residential Stages 1-3 within the western precinct, where three 15-storey buildings are approved or proposed. Design principles to guide future stages of the development have been developed at the suggestion of the Department and Council, with a particular focus on:

- Maximising activation on external street frontages.
- Providing a street address for the residential and tourist accommodation.
- Minimising the impact of loading dock and car parking entry/exit points, plant, services and above ground car parking.
- Identifying and separating public and private areas.
- Managing the separate car parking and traffic impacts of the various uses, including drop off/pick up for the tourist accommodation.

Through the amendments to the height of the height of buildings and measures to increase activation and integration of the development, the proposed built form is considered to be appropriate as it:

- Provides for a range of building heights and typologies to break up the bulk and mass of the building form.
- Provides for articulation and activation of the approved podium by accommodating additional land uses with access from the ground plane.
- Supports the creation of a town centre by incorporating a range of land uses which are physically integrated and complementary to each other.
- Is consistent with the residential building heights of 15 storeys that are approved in the residential precinct of Woollooware Bay Town Centre.
- Facilitates an appropriate residential amenity outcome and will not result in any unacceptable or overshadowing impacts.

5.1.1 Building height and visual impact

The amended built form has responded to submissions received from government agencies and the public by reducing the height of Building B. The maximum building height has been reduced to 15 storeys, consistent with the maximum building height of approved and proposed residential buildings in the eastern precinct. Specifically, Building E in Stage 1 (constructed), Building G in Stage 2 (under construction) and Building B in Stage 3 (proposed) rise to a total of fifteen storeys (including podium) as shown in **Figures 4** and **5**.



Figure 4- Illustration of modified building heights

Source: Turner

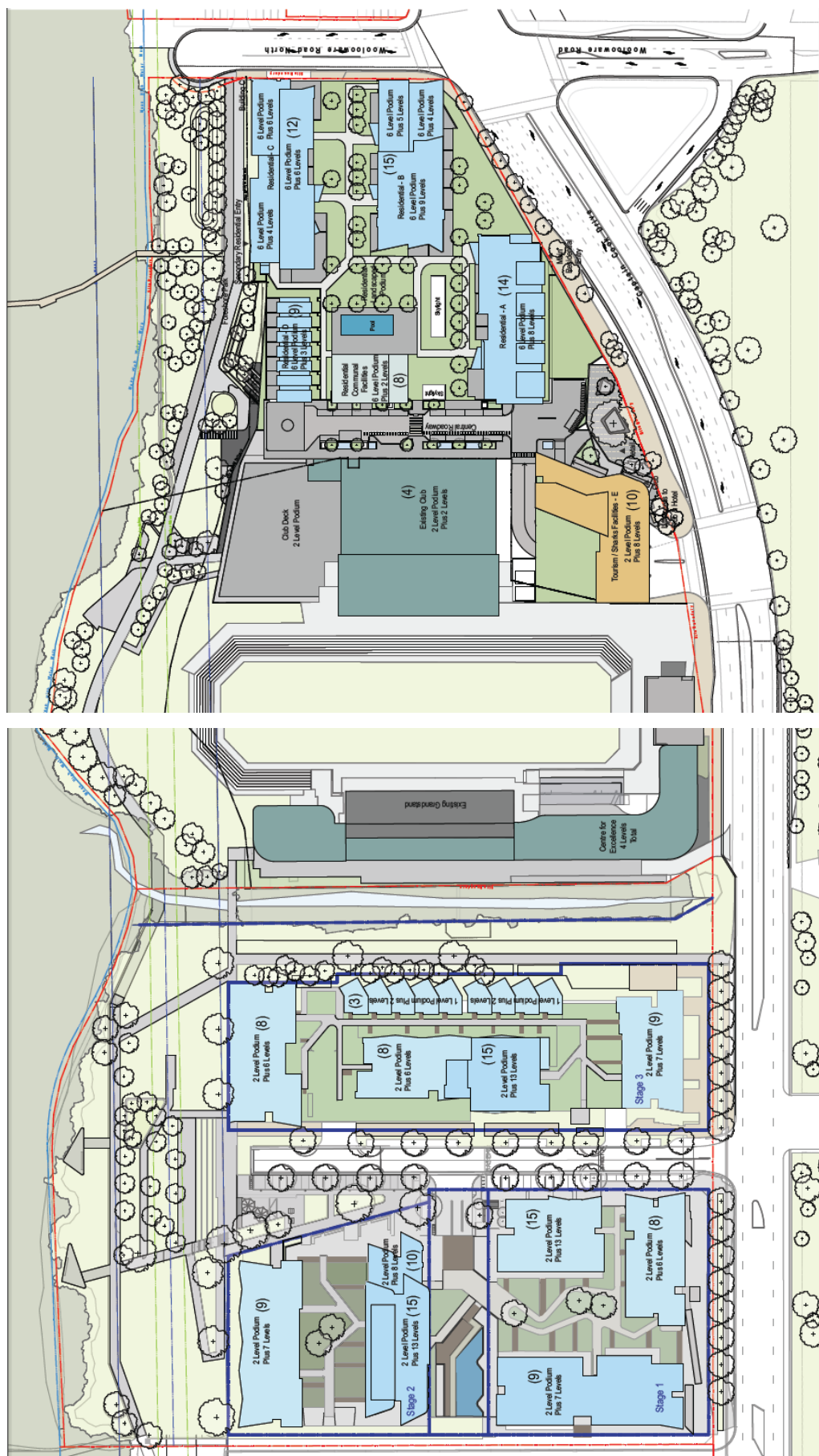


Figure 5- Comparison of building heights across Woollooware Bay Town Centre

It is also noted that the proposed reduction in building height will reduce the impact on surrounding residents with views to Woollooware Bay. Separation between buildings above the podium has been maintained to provide views through the site, as discussed in the submitted modification application.

The increase to the height of Building C and Building E is to facilitate the provision of affordable housing and remains below the maximum building height proposed and consistent with building heights across the precinct.

In addition to this change, the amended development has sought to improve the integration of the additional uses with the town centre by providing multiple entries to the centre from Captain Cook Drive for both residents and users of the centre. **Figure 6** demonstrates that the Captain Cook Drive street frontage will seek to maximise opportunities for activation by accommodating tenancies that open to the street and multiple entry points.



Figure 6- Captain Cook Drive activation

Source: Turner

The amended proposal retains the articulation of the façade through a range of treatments and materials to modulate the mass of the podium structure and to allow the centre to present as a collection of integrated buildings.

5.1.2 Design Principles

The Design Report prepared by Turner at **Appendix B** outlines how the proposed development has incorporated key design principles identified by the Department, as detailed in **Table 5** below. It is recommended that these principles inform future detailed design.

Table 5- Design Principles for Future Development

Issue	Design Principles
Maximise activation of external street frontages	<ul style="list-style-type: none"> Enhance street access to the hotel through signage and other design measures. Provide lobby at ground level of Building C to create residential access to the foreshore. Provide uses at ground level on Captain Cook Drive that maximise activity.

Issue	Design Principles
Provide a street address for the residential and tourist accommodation	<ul style="list-style-type: none"> • Provide signage to clearly identify hotel and residential accommodation. • Ensure design of lobbies is transparent and open to the street.
Minimise impacts of loading dock and car parking entry/exit points, plant, services and above ground car parking	<ul style="list-style-type: none"> • Loading docks and car parking entry/exit points, plant and service rooms on Levels 1-4 and retail car parking is to be constructed in accordance with the Club/ Retail Precinct Project Approval (MP10_0230). • Above-ground car parking for Buildings A –D is to include an open architectural treatment, which screen parking while facilitating natural ventilation. • Above-ground car parking for Building E (Hotel/Residential) is to be screened with a facade that is consistent with the hotel/residential building above.
Identify and separate public and private areas	<ul style="list-style-type: none"> • Detailed design of the development will clearly delineate between public and private areas through the use of signage, security monitoring and other design measures.
Manage separate car parking and traffic impacts of the various uses, including drop off / pick up for the tourist accommodation	<ul style="list-style-type: none"> • Provide separate entry and exit arrangements for each use. • Provide dedicated hotel car parking within the Building E envelope, including a separate drop off / pick up area. • Implement a guided parking management system

5.1.3 Activation and Way-Finding

Activation and way-finding diagrams have been included in the Amended Concept Plan Drawings at **Appendix C**. These diagrams illustrate tenancies at ground level along Captain Cook Drive will be designed to ensure that they are active to the street, as shown in **Figure 7**.



Figure 7- Building entry on Captain Cook Drive

Source: Turner

The way-finding diagrams in the Amended Concept Plan Drawings illustrate how future residents, tenants and users of the centre can access different parts of the development from each level. The diagrams illustrate access for both vehicles and pedestrians, indicating entry and exit points, drop off zones, street entry and lifts.

5.1.4 Summary

Through the reduction of the height of buildings and measures to increase activation and integration of the development, the proposed built form is considered to be appropriate as it:

- Provides for a range of building heights and typologies to break up the bulk and mass of the building form.
- Provides for articulation and activation of the approved podium by accommodating additional land uses with access from the ground plane.
- Supports the creation of a town centre by incorporating a range of land uses which are physically integrated and complementary to each other.
- Is consistent with the residential building heights of 15 storeys that are approved in the western residential precinct of Woollooware Bay Town Centre.
- Facilitates an appropriate residential amenity outcome and will not result in any unacceptable or overshadowing impacts.

5.2 Traffic and Parking

The development of Woollooware Bay Town Centre has been guided by a commitment to reduce car use and has been accompanied by detailed traffic modelling at all stages of the project. The Preferred Project design increases car parking spaces by 92 to a total of 1,120 car parking spaces above the retail centre and traffic modelling has shown that the impact on the local road network will be minimal.

An updated Traffic and Parking Assessment prepared by McLaren Traffic Engineering is attached at **Appendix F** and a detailed response to the issues raised is provided below. The Traffic and Parking Impact Assessment submitted with the modification application assessed the provision of car parking, design of the car park, traffic generation and potential traffic impacts and found that potential impacts are acceptable. The assessment of these matters remains generally unchanged in relation to the proposed development, with the exception of the relocation of the hotel car parking and increase in car parking numbers.

The availability of car parking, traffic impacts and alternative transport options was a key issue for government agencies and the public, and the Preferred Project addresses this. The following common issues were also raised by the Department and Council:

- A commitment to providing a minimum amount of car share spaces and justification for how the number was derived.
- Retaining or reinstating the shuttle bus to Woollooware station.
- A commitment to increased bicycle parking.
- Management of access and parking for each of the land uses.
- The performance and capacity of the local road network.

5.2.1 Traffic Generation

Updated traffic generation modelling has been undertaken by McLaren Traffic Engineering, that demonstrates that the proposal will result in a slightly increased peak traffic generation than the expected traffic generation as a result of the approved retail centre. Specifically:

- There will be approximately 161 more trips during the weekday peak.
- There will be approximately 91 more trips during the weekend peak.
- During the week, the residential component accounts for only 4.2% of traffic generation within the Eastern Precinct.
- On the weekend, the residential component accounts for only 1.2% of traffic generation within the Eastern Precinct.

As illustrated in **Table 6** and **Figures 8** and **9**, the vast majority of traffic generation associated with Woollooware Bay Town Centre is associated with the approved uses within the Retail and Club (Eastern) Precinct. The proposed new uses, being the Stage 4 Residential and Hotel, would represent only a small fraction of traffic movements during these key peak periods.

Based on this increased traffic generation, detailed modelling shows that both signalised intersections servicing the centre operate at Level of Service A or B during critical time periods. At the Gannons Road and Captain Cook Drive roundabout, Level of Service B is maintained under the traffic volumes generated by both the approved retail centre and the proposed modification. McLaren Traffic Engineering consider this to demonstrate that the intersection operates well, with acceptable delays and spare capacity. Overall, the updated assessment finds that traffic impacts as a result of the proposed modification are supportable.

Table 6- Woollooware Bay Town Centre Traffic Generation

Precinct	Friday PM Peak (5-6pm) Trips per hour	Saturday Midday Trips per hour
Retail/ Club Precinct (Amended)	1,519	1,471
Hotel (Proposed)	26	64
Residential Stage 4 (Proposed)	65	17
<i>Eastern Precinct Sub-total</i>	<i>1,610</i>	<i>1,552</i>
Residential Stages 1-3 (Approved – CP MOD 3)	234	47
Woollooware Bay Total	1,844	1,599

Traffic Generation Friday 5-6PM (Trips per hour)

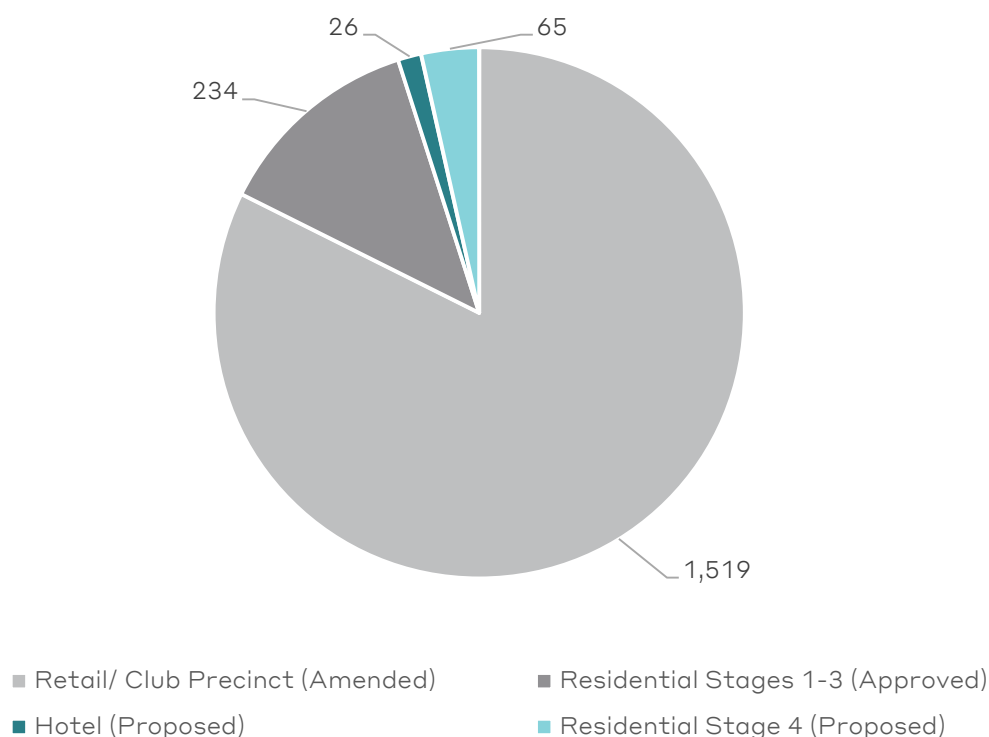


Figure 8-Friday PM peak traffic generation within Woollooware Bay Town Centre

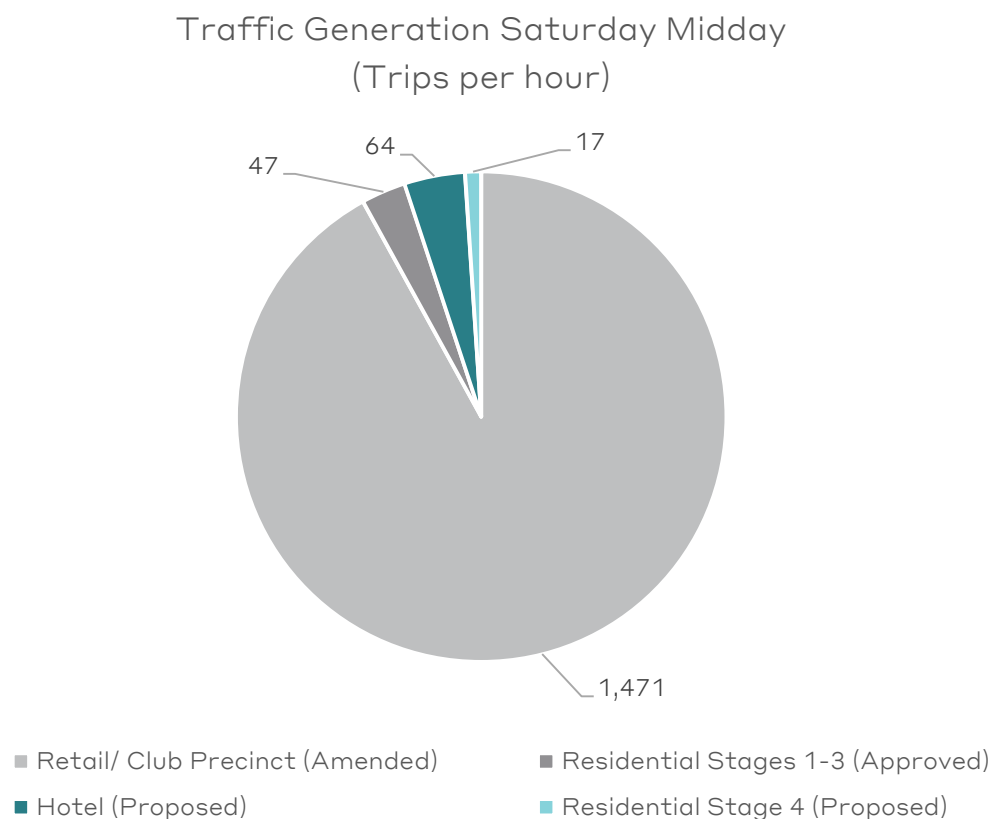


Figure 9- Saturday Middy peak traffic generation within Woollooware Bay Town Centre

5.2.2 Car Share

The number of car share spaces provided has been determined based on negotiations with GoGet, who have advised that a total of four car share spaces for the development is appropriate. This number is based on two spaces to service the residential component of the development and two spaces to service the hotel component, however it is noted that share cars may be used by any person with a membership (e.g. use is not restricted to hotel patrons).

Capital Bluestone is committed to the allocation of car share spaces as part of the future development.

5.2.3 Shuttle Bus

Council's submission on the exhibited Modification Application expressed a view that a shuttle bus should be re-instated to run in concurrence with the public bus service to support the additional proposed uses. In particular, the Council submission raised concern that the existing public bus route is 'circuitous' and does not connect to Woollooware Station, being the closest train station to Woollooware Bay Town Centre. The Department's issues letter required that further consideration be given to this matter.

Public bus route 985 commenced operation on 20 November 2016, ahead of the first residential occupation of Stage 1, will initially provide 272 trips across the week including 44 each weekday, 28

on Saturdays and 24 on Sundays. It is likely that this service will increase in frequency as further residential stages and the retail centre are completed. The service currently takes 6 minutes between Woollooware Bay Town Centre and Caringbah Station, and also connects to Cronulla Station (8-12 minutes) and Miranda Station (14 minutes). This route is not considered to be circuitous, but rather connects a number of key local centres which provide not only public transport, but a wide range of services and destinations.

A direct shuttle connection to Woollooware Station may reduce travel times to a station by 2-3 minutes compared to the Route 985 service to Caringbah Station, however, it is noted that much of this saving would be offset by the additional 2 minute train journey between Woollooware and Caringbah for city-bound commuters. Therefore, a direct shuttle would provide minimal benefit in terms of travel time savings or convenience. It is also noted that Woollooware Station provides no other immediate conveniences in terms of retail or public services, in contrast to the Caringbah and Cronulla station precincts.

Notwithstanding the above, Capital Bluestone have consulted with Transport for NSW (TfNSW) to determine the possibility that the existing Route 985 could be amended to include at Woollooware station. A copy of correspondence received from TfNSW is provided in **Appendix F**. In summary, TfNSW's position is that:

"TfNSW believes that the 985 connects users to the transport interchanges of Miranda, Caringbah and Cronulla – which operates the same Heavy Rail train line from Woollooware."

TfNSW have further advised that:

- TfNSW is limited in delivering bus services to Woollooware Station due to restricted road space available and the constrained ability to accommodate a 14.5 metre bus (particularly at the eastern end of Denman Avenue).
- TfNSW will continually review development progress in the area. Any enhancements to existing bus services would be subject to TfNSW Growth Services Program.

We note that any private shuttle connection to Woollooware Station may also have the effect of diverting patronage away from the existing Route 985 public bus service, thereby reducing the capacity of TfNSW to increase service frequencies in the future. This would not only impede the efficient delivery of public transport to residents of and visitors to Woollooware Bay, but also passengers who utilise the Route 985 service to connect to existing residential areas and other centres.

The Route 985 public bus service is a significant public transport addition to the local area which has been catalysed by the additional patronage from Woollooware Bay Town Centre. The service meets key transport planning objectives under its current route configuration, which is confirmed by advice from TfNSW. Future development at Woollooware Bay Town Centre should be encouraged to further increase patronage (and therefore viability and frequency) of this service, rather than being diverted away to other travel modes for limited benefit.

5.2.4 Bicycle Parking

A total of 67 additional bicycle parks are proposed in addition to the 36 bicycle parking spaces and 13 storage cages included in the retail development. It is noted that Sutherland Shire Council's Development Control Plan does not require bicycle parking to be provided for the retail centre.

These additional bicycle parking have been located in strategic locations to encourage visitors to the centre to cycle, as follows:

- At the entry to Level 1 on Captain Cook Drive four bicycle racks will be provided to accommodate a total of eight bikes.
- Within the Level 5 retail car park, five racks will be provided to accommodate a total of 10 bikes.
- Within the Level 6 retail car park, 26 racks will be provided to accommodate a total of 49 bikes.

5.2.5 Car Park and Access Management

Details relating to the car park and access in and out of the site are explained in the Traffic and Parking Assessment at **Appendix F**.

The proposed modifications rely on the traffic and access arrangements approved under Project Application MP10_230 and are capable of accommodating the additional uses proposed. Two separate access points are provided for the development, via signalised intersection on Captain Cook Drive and via Woollooware Road. The access from Captain Cook Drive will serve:

- Residents.
- Hotel patrons and staff.
- Vehicles dropping off to the club.
- Access to the retail/club car park at Level 3.

The access from Woollooware Road will provide access to the retail/club car park at Level 1. Internal ramps provide access to other car parking levels.

To facilitate efficient entry into the retail/club car park, a number-plate identification system will be implemented. The operation of this system does not require drivers to stop at a boom gate and has sufficient capacity for approximately 1,250 vehicles per hour per entrance lane. This is expected to adequately cater for the 590 vehicles that are expected per hour.

Each exit from the retail/club car park is provided with two barriers and pay terminals. It is expected that 50% of patrons will pre-pay for parking in the centre and 50% will pay at the terminal, resulting in delays of between 5 and 10 seconds at the car park exit.

The entry/exit points to the hotel and residential parking areas are separate from the retail/club car park and will experience significantly less demand. Hotel guests will be able to enter the car park using an intercom system and residents will use a remote-activated gate system. No queues are expected at either of these entry/exit points.

In addition to these measures, dedicated hotel car parking has now been provided within Building E on Levels 4 and 5 in response to the recommendation of Council.

5.2.6 Local Road Network and Parking Impacts

It is noted that throughout the project, Capital Bluestone and the project team have committed to measures to reduce car usage and increase the use of alternative forms of transport such as public

transport and cycling. This includes the introduction of the 985 bus route to surrounding train stations and the provision of facilities to support cycling.

It is also noted that extensive traffic modelling has been undertaken throughout the project and that the impact of traffic as a result of the development is considered to be acceptable. Extensive intersection and road works have been committed to as part of the Woollooware Bay Town Centre development in direct response to the existing limitations of the road network servicing the site. The additional development on the site will result in an estimated increase of:

- 161 trips in the weekday peak hour.
- 91 trips in the weekend peak hour.

This traffic generation is considered a minor increase and does not warrant further works on the wider road network servicing the site.

The Traffic and Parking Assessment at **Appendix F** details that there was an error in the previous traffic modelling, and that this error has now been corrected. As a result the level of service at the intersection of Captain Cook Drive and Gannons Road is rated at C, rather than level of service F.

In relation to parking impacts in the wider area, it is noted that each residential dwelling is sold with a particular allocation of car parking spaces and any choice by residents to own more cars than they have spaces for is beyond the control of Capital Bluestone. As a result of this, the introduction of parking restrictions by Council on surrounding streets and in public parking areas is supported.

The Traffic and Parking Assessment at **Appendix F** also notes that the future dwellings will be located on top of a shopping centre, which will cater for day-to-day shopping needs and is expected to reduce the demand for car ownership. A similar logic can be applied to residents of the residential precinct.

Overall, the traffic and parking impacts associated with the development are considered to be minor and Capital Bluestone has implemented a range of measures to ensure that any negative impacts can be appropriately mitigated through the use of car share, the 985 bus route and the improvement of cycling facilities and infrastructure within the locality.

5.3 Public Benefits

The proposed development will provide much-needed tourism accommodation and housing within the Sutherland Shire to meet the needs of the existing and future community, whilst not giving rise to any significant adverse environmental impacts. Future applications for development will be conditioned to contribute to local infrastructure in accordance with Council's identified infrastructure requirements in accordance with the applicable development contributions plan.

Notwithstanding the above, Capital Bluestone are willing to commit to the provision of additional public benefits in conjunction with the proposed modification to deliver targeted outcomes for the key identified issues of affordable housing and local cycleway infrastructure. This voluntary commitment is in keeping with Capital Bluestone's good corporate citizenship of the local community, where their involvement in numerous charitable and community programs has been supported by the Woollooware Bay Town Centre project.

Capital Bluestone has been engaged in ongoing discussion with Council about what initiatives or works may be undertaken to ensure that the community will benefit from the proposed additional land uses. These discussions, along with matters raised by the Department in relation to housing

affordability, have informed the public benefit offer described in **Section 3.1.3** of this report. The total value of the offer is estimated to be in the order of \$6,170,000, or approximately \$27,800 per dwelling (excluding affordable rental housing dwellings). The value of this offer will be secured through two new Statements of Commitment (**Appendix C**) which would form part of the Part 3A Concept Plan Instrument of Approval should this modification be approved, and would ensure that these commitments are able to be enforced by Sutherland Shire Council at the detailed Development Application stage.

This is a significant voluntary contribution over and above the requirements of existing statutory planning policies (i.e. Section 94 Contributions) to deliver additional benefits to the local community. The proposed public benefits further improve the merits of the proposed modifications, and ensure that the project will deliver a net community benefit for the existing and future community.

5.4 Biodiversity

5.4.1 Referral under the Environmental Protection and Biodiversity Conservation Act 1999

The Department and Council have requested confirmation of whether the proposal is likely to cause significant impacts that would constitute a controlled action under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The Commonwealth has previously reviewed the original Concept Plan application and advised that the project is not a controlled action under the EPBC Act.

The proponent has made contact with the Commonwealth Department of Environment and Energy, following lodgement of the modification application. The original proposal was referred to the Department of Environment and Energy, which found that the proposed development was not a controlled action. Following correspondence in May 2017, the Department of Environment and Energy have confirmed that the proposal is *'sufficiently similar in its nature and scope to the previous decision, that a similar outcome would be likely.'*

As the previous EPBC referral found that the proposed development did not constitute a controlled action, it is considered that a new referral under the EPBC Act is not required. A copy of this correspondence is provided at **Appendix I**.

5.4.2 Biodiversity Assessment

An updated Biodiversity Assessment has been prepared by Ecological Australia and is provided at **Appendix J**, in response to the requests of the Department and Council. The updated assessment considers potential impacts at the subject site and within the wider study area, which includes Towra Point Aquatic Reserve and Towra Point Nature Reserve. Targeted fauna surveys and assessments have been conducted for microbats, frogs and migratory shorebirds, as well as other threatened species and communities, in accordance with the relevant assessment guidelines, concluding that there will be no significant impact to threatened species, populations or communities as a result of the proposed development.

The proposal would not involve 'key threatening processes' as defined by the *Threatened Species Conservation Act 1995* and the *Environmental Protection and Biodiversity Conservation Act 1999*, with the exception of a risk of disturbing roosting and summer breeding sites as a result of noise and

light from the development. It is also noted that buildings higher than the mangrove canopy could present a hazard to birds. These issues are discussed below:

Noise

The Biodiversity Assessment finds that fauna currently inhabiting mangroves near the stadium and car park as well as other areas near the light industrial land uses around Woollooware Bay may already be accustomed to elevated noise levels. Fauna at Towra Point are likely to already experience noise associated with boat and aeroplane movements and are unlikely to be affected by construction or operational noise from the proposed centre because of noise attenuation over distance. Higher levels of noise are likely to be experienced in the mangroves closest to the subject site and may discourage fauna from inhabiting these areas during construction. To mitigate this, it is recommended that construction that involves high levels of noise is limited from occurring during dusk and dawn and that noise during the evening is limited post-construction.

Light

Light spill from the proposed development both during and post-construction may impact on the hunting and breeding patterns of microbats that inhabit the mangroves, however it is considered that the foreshore landscaping would reduce light from entering the mangrove habitat. Other mitigation measures include directing lighting only to where it is needed for security purposes and it is considered unlikely that there would be a significant impact to ecology from the proposed lighting.

Bird Strike

Due to building envelopes protruding above the height of the mangroves, Ecological have identified there is a potential risk of bird strike due to buildings being situated within the broader vicinity of migratory flight paths if façades are plain mirrored glass. It is noted that observation of actual flight patterns for migratory birds by Ecological indicate that flight paths do not appear to be near the Woollooware Bay Town Centre site. In addition, and consistent with the treatment of the Retail/Club centre and Residential Stages 1-3, the Modification Application reflects recommendations that building facades are articulated to reduce potential for bird strike that the proposed building facades feature a variety of window and external wall treatments and styles.

A number of additional mitigation measures are proposed to minimise potential impacts and provide positive ecological outcomes on the site, including:

- Planting to feature native species to increase habitat value of the new urban environment.
- Water sensitive urban design principles should be applied to the site to capture and reuse stormwater where possible.
- Use a variety of façade designs to minimise the risk of bird strike.
- Regularly remove litter from the site.

The recommendations of the updated Biodiversity Assessment will be incorporated at the detailed design phase in accordance with existing conditions of the Concept Plan Approval.

6.0 Additional Information and Assessment

The exhibited EAR addressed the potential impacts of the overall development against a range of matters relevant to the development. Except where addressed and assessed in **Section 4** and **5** above, the conclusions of the original assessment remain unchanged. Therefore, the assessment of the following matters remain unchanged:

- Stormwater flooding and utilities;
- Noise and vibration;
- Structural engineering;
- Crime and public safety;
- Waste;
- Ecologically sustainable development;
- Airport operations;
- Wind impact;
- Electromagnetic radiation; and
- Construction management.

6.1 Consistency with Concept Plan MP10_0229

The proposed development remains consistent with Concept Plan MP10_0229 (as modified) given that:

- The Concept Approval will continue to be for a new mixed use town centre with range of land uses to meet the housing, retail, leisure, entertainment and open space needs of the current and future community;
- The modifications relate to improvements to the integration of land uses, will complement the already approved land uses and facilitate the delivery of an integrated town centre in response to submissions made in relation to the original Concept Plan assessment process;
- The additional development proposed is capable of being accommodated within the existing site without the need for substantive additional infrastructure on or in the vicinity of the site; and
- The modifications do not give rise to any additional environmental impacts that were not raised in the original Concept Plan environmental assessment and appropriate measures can be incorporated into the detailed design of the development to ensure that any impacts will be minimised and mitigated.

A comparison of the key development statistics under the current Concept Plan approval (as modified) to what is proposed under this modification is provided at **Table 7**.

Table 7 – Comparison to approved Concept Plan

Development Component	Approved	Proposed	Difference
Total GFA	88,782m²	126,677m²	+37,895m²
Western (residential) Precinct GFA	61,370m ²	No change.	No change
Eastern (Retail/Club) GF	27,412m ²	65,307m ²	+37,895m ²
Total GBA	176,134m²	252,259m²	+76,125m²
Western Precinct GBA	115,402m ²	No change	No change
Eastern Precinct GBA	60,732m ²	136,857m ²	+76,125m ²
Club Outdoor Deck	1,827m ²	No change	No change
Car Parking Spaces	770	1,170	+400

6.2 Consistency with Project Application MP10_0230

The proposed development remains consistent with Project Application MP10_0230 (as modified) as the development will still incorporate a retail centre with full-line supermarket, food retail, mini-major tenancies, specialty retail, dining tenancies and medical and leisure uses. As noted above, the additional development is capable of being accommodated within the existing site and will not significantly alter the existing Project Application approval.

7.0 Conclusion

The proponent, Bluestone Capital Ventures No.1 and Cronulla Sutherland Leagues Club, have considered all submissions made in relation to the public exhibition of the proposal, and provided a considered and detailed response to all submissions.

In responding to and addressing the range of matters raised by government agencies and authorities and the general public, the proponent has sought to refine the project design.

As outlined within this report, the analysis of the amendments to the proposed development confirms that key elements of the original proposed development that was exhibited remain unchanged, and that key changes to reduce building heights, incorporate affordable housing and relocate the hotel car parking will benefit future residents and the surrounding community.

The refined development seeks to incorporate the recommendations made by the Department and Council, as well as respond to the key issues raised in public submissions. To the benefit of the overall project, the environmental impacts of the amended development remain consistent with the original application and deliver a project that results in an overall improvement to the original publicly exhibited development. The proposal has significant planning merits as it will:

- Facilitate a range of uses to complement the existing Leagues Club, retail, leisure and entertainment uses present within the eastern precinct of Woollooware Bay Town Centre and deliver a vibrant mixed use centre.
- Meet an identified need for quality tourist and visitor accommodation within Sutherland Shire to assist in growing the local visitor economy and capitalise on the potential for increased event-based tourism associated with the Southern Cross Group Stadium.
- Deliver new housing to meet the needs of current and future residents of the Sutherland LGA.
- Provide additional dwellings for affordable housing and first home-buyers to alleviate housing stress and contribute to the provision of affordable housing in Sutherland Shire.
- Make a significant \$1.4 million contribution to local cycling infrastructure connectivity.
- Carefully integrate with the existing character of the area, in particular to be complementary to the western residential precinct and the adjoining mangroves and Towra Point Aquatic Reserve through the incorporation of additional landscaping on the podium levels.
- Achieve design excellence by providing a highly activated frontage to the street, incorporating a range of building typologies and high quality architectural finishes as demonstrated in the delivery of the first residential stages at Woollooware Bay.
- Not give rise to any unacceptable impacts whilst generating significant economic and social benefits for the existing and future community.

In conclusion, the modification to permit additional land uses and associated amendments to MP10_0229 and MP10_0230 represent a key component of the Woollooware Bay Town Centre development that will have significant benefits for the surrounding community. The careful design of the proposal in combination with the range of land uses and incorporation of affordable housing will foster an integrated and vibrant town centre to complement existing development at Woollooware Bay and support the growth of Sutherland Shire.