STATE SIGNIFICANT DEVELOPMENT EDEN STREET ARNCLIFFE REDEVELOPMENT

INTRODUCTION

On 30th July 2021, the Department of Planning, Industry and Environment (DPIE) requested comment in relation to the exhibition of an Environmental Impact Statement (EIS) prepared in support of a State Significant Development Application (SSDA) for the redevelopment of the NSW Land and Housing Corporation (LAHC) site at Eden Street, Arncliffe into a mixed-use precinct with retail and residential uses, involving both market and social housing as part of the LAHC's 'Communities Plus' Program.

BACKGROUND

On the 24th November 2020, the DPIE issued a new request for advice requesting Council officers to review the draft Secretary's Environmental Assessment Requirements (draft SEARs). The project included construction of a mixed-use development comprising:

- 714 residential apartments within four buildings, including 180 social housing apartments;
- approximately 4,235sqm of retail/ commercial floor space;
- a child care centre for 90 children and 28 staff;
- a public open space of 4,000sqm;
- 950 car parking spaces within 3 levels of basement car parking; and
- A potential Community Facility/ Library.

Council staff provided a detailed response to the draft SEARs, which is included as **Attachment 1** to this submission.

It is noted that the draft SEARs proposed to include a community facility/ library in the form of a 'cold-shell' to provide the community benefit component of the draft SEARs. The SSDA has been revised to remove reference to the potential community facility. Public benefit is proposed to be delivered via the provision of diverse housing, a publicly accessible park, and both Section 7.11 and Special Infrastructure Contributions.

Council understands that the proponent intends to prepare a future Planning Proposal to vary the current planning controls that apply to the site, so that a future community facility/ library (to be delivered to Council via a Planning Agreement) may be accommodated within the site. Council's working group continues to work with the proponent on the details of the potential community facility/ library on the site.

SUBMISSION

Council staff have undertaken a review of the exhibited documents and provide the following comments for the DPIE's consideration:

Draft Housing SEPP

It is noted that Clause 15 the draft Housing SEPP, Division 1, In-fill Affordable Housing states:

- 15 Development to which Division applies
 - (1) This Division applies to residential development if—
 - (a) the development is permitted with consent under another environmental planning instrument, and
 - (b) the development is on non-heritage land, and
 - (c) at least 20% of the gross floor area of the development will be used for the purposes of affordable housing, and

The proposed development provides 18% of the gross floor area of the development for the purposes of Affordable Housing.

It is noted that Clause 6 of the current Affordable Rental Housing SEPP is not carried over into the draft Housing SEPP, namely:

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

The proposed development is inconsistent with the provisions of the draft Housing SEPP.

Apartment Design Guide

3E Deep Soil

For sites that have an overall area greater than 1,500sqm, Part 3E of the ADG recommends that 15% deep soil with a minimum dimension of 6 metres be provided. At 7%, the proposal is substantially below and would benefit from additional deep soil provided along the Princes Highway frontage to allow for large tree planting. This will require a greater basement setback and may potentially result in the loss of several carparking spaces.

4B Natural Ventilation

A number of single aspect apartments throughout the development have been nominated as having cross ventilation, which is not correct. As stated in the ADG *"effective cross ventilation is achieved when the inlet and outlet have approximately the same area, allowing air to be drawn through the apartment using opposite air pressures on each side of the building".*

For example, below is a screenshot of the natural ventilation diagram of Tower 5C. This shows the central unit as naturally ventilated but not its neighbours either side, despite having a similar layout. The proposal is put forward as providing the minimum 60% cross ventilated apartments, which appears to be an overstatement.



Rockdale LEP 2011

6.11 Active Street Frontages

There are elements of the development that do not satisfy the provisions of Clause 6.11 of RLEP 2011, namely the outdoor play area to the proposed childcare centre. This represents a substantial proportion of the frontage along Princes Highway that is not activated in accordance with the provisions of this clause.

Furthermore, it is not considered appropriate to locate the child care centre open outdoor play areas on the Princes Highway frontage, when the area could be better located for health and amenity toward the public park in the middle.

Clause 4.6 Considerations

It is noted that the proposal seeks to vary both the height and floor space ratio standards applicable to the site.

Floor Space Ratio

The site is mapped with a 4:1 FSR under Rockdale LEP 2011. An FSR bonus of 20% available under the Affordable Rental Housing SEPP, equating to 4.8:1.

The EIS states that an FSR variation over the 4.8:1 allowed of 1825m² is proposed, which is 2.8%. It is noted that the submitted Gross Floor Area (GFA) calculations do not include the wintergardens. They should be, so that they can be checked against the clause 4.6 statement for accuracy.

There is little justification for non-compliance, when the generous height and FSR controls created for the site via *SEPP Arncliffe and Banksia Precincts* conferred considerable uplift to LAHC over those of surrounding sites, and a substantial bonus is available and being accessed for the affordable housing.

Were the site owned by an entity other than LAHC, the bonus would be 7.2% or an FSR of 4.29:1 (based on the formula set out in clause 13(2)(b)(ii) of the SEPP).

The draft Housing SEPP must be considered in the Section 4.15 assessment. The provisions for defining Affordable Housing under the current SEPP (Clause 6) is not carried over, therefore, the 20% FSR bonus would not apply.

The high density is exemplified by the non-compliant height and street wall setbacks.

It is understood that the proponent is preparing a planning proposal that will seek to increase FSR and height. This is the appropriate process to consider **all or any** variations to planning controls in a holistic way. Fragmenting the consideration of planning control breaches between cl.4.6 and a planning proposal is a misuse of the planning process and could be seen as double dipping.

Height

Table 1 on page 4 of the Clause 4.6 request prepared by Ethos Urban (5 May 2021) shows the extent of the variation to height of the proposal as follows:

Table 1 Height variation by building										
Building	LEP 2011 Height	Max Building Height	Maximum Variation							
Building A/B	70m	74.3 m	+4.3 m							
Building B	70m	74.85m	+5.05 m							
Building C	70m	64.3 m	-5.7 m							
Building D	70m	60.6 m	-9.4 m							

As indicated above, there is an error in the maximum variation sought for the height exceedance of Building B, with the maximum height of 74.85m being contradictory to the maximum variation column of 5.05m. Whilst minor, a Clause 4.6 statement must accurately state what the variation is to be considered by the consent authority. This should be checked by the assessing officer and corrected by Ethos.

The proposed breach is not supported, as the height under the Rockdale LEP 2011 is already significantly higher than all other sites in the locality. This site was identified as a landmark site and given a significantly higher height limit, and any additional height will make if difficult to reconcile with the surrounding area.

It is noted that the height of building controls for the surrounding land, whilst also benefiting from uplift under the recent SEPP Arncliffe & Banksia Precincts, is limited to 31m, 36m and 42m, which is more than **30m less** than the subject proposal.

The commentary of the surrounding heights, and the proposal's 'transition' to them, is questionable. As stated above, the height differential is dramatic and not considered transitional. Further, there is no attempt to setback the additional height from the edges of the building, especially where the entirety is set against the street wall height of the Princes Highway elevations. This is not supported.

The 'provision of social housing under the ARH SEPP' is not considered an adequate argument to breach the height limit, given the non-compliance with floor space ratio.

The purported lack of material impact, such as overshadowing, should be better quantified. There may be an argument for redistribution of height from buildings C and D to reduce impacts from them.

The argument that the building elements exceeding the height does not include habitable floor area is also questioned. Deletion of a level below would still permit the height limit to be much more closely adhered to (if only resulting in a 1m or so breach), whilst also providing for rooftop facilities.

There is no attempt to setback the additional height from the edges of the building, especially where the entirety is set against the street wall height of the Princes Highway elevations. This is not supported.

Rockdale DCP 2011

The proposed development should ensure compliance with the provisions of the Rockdale DCP, in particular, those set out in Chapter 7.7 – Arncliffe and Banksia. The site is in the Arncliffe Town Centre sub-precinct, and the proposal is to comply with the provisions contained therein. Retail Streets landscape controls, in particular with respect to street trees and undergrounding of power lines, should be satisfied by the proposal.

Part 4.2 requires a maximum street wall height of 6-storeys at the perimeter of all frontages, including the park. The proposal does not comply with this, accentuating the vertically imposing facades on the public domain.



The retail tenancies should incorporate 7m high floor to ceiling heights along the Princes Highway frontage.

Amendments should be made to set back the basement from the Princes Highway frontage to create more genuine deep soil along this frontage, to allow uninhibited healthy tree growth. Refer to the image from the DCP below. The childcare centre outdoor space ignores this requirement completely. The sections through Tower D do not demonstrate how trees, or deep soil planting, will be accommodated with the basement directly underneath.



Figure 7.7.27 Indicative Section and Plan of Intermittent planting along the Princes Highway in the Arncliffe Precinct

Urban Design

The proposal was previously reviewed in December 2020. Design development that has been undertaken since the proposal was last reviewed includes:

- Street setbacks have been increased from Eden Street;
- A more activated street interface has been developed to Princes Highway; and
- All community facilities have been removed from the proposal.

A strategy for the development of the Eden Street Precinct is documented in the Rockdale DCP, Part 7 Special Precincts. Figure 7 of section 7.19 shows indicative built form within the Eden Street Precinct. The built form diagrams depict a park that links Eden Street with the Princes Highway, the park provides:

- clear pedestrian links between Eden Street and the Princes Highway;
- a generous level lawn area, that will provide a flexible space for outdoor activities, overlooked by perimeter steps; and
- new tree planting at the park's interface with Princes Highway to supplement existing established trees, providing a significant grove of trees between the highway and park.

The current proposal provides some positive developments to the strategy outlined in Council's DCP. The splayed shape of the park, generous northern forecourt (meeting place), and rationalised pedestrian strategy, all contribute to a park that is better connected to the train station, and more sheltered from the harsh environment of the Princes Highway. However, further consideration of the following issues is recommended:

- The functionality of the central green space is questioned. The DCP envisaged a relatively flat central green space with steps around a portion of the perimeter. This space would facilitate a range of activities, including ball games.
- Greater provision should be made to increase the density of trees at the park's interface with the highway. Existing established trees in this area should be maintained. To increase opportunity for deep soil planting, the reduction of the extent of the basement in this location is recommended.
- Very minimal setbacks have been proposed between the basement and site boundaries. This leaves little scope to maintain existing trees or accommodate new trees of scale. The photo below shows an existing tree in the north western corner of the site within the proposed basement vehicular entry. The driveway should be adjusted to allow existing mature trees to be maintained.



 Existing trees should be maintained in all locations where they are providing a positive contribution to the streetscape or improved interface with neighbouring properties. To achieve this, basement setbacks should be developed in response to a detailed review of existing trees

To meet Design Excellence requirements, the proposal must 'demonstrate how the proposed building (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and **future** character of the locality.'

The proposal occupies the central portion of a large urban block. The north eastern and south western edges of the block remain potential development sites that can be developed with buildings up to 13 storeys in height. A comprehensive design response for the subject site must be informed by a contextual study that shows how the full extent of the urban block can be developed to realise Councils' vision for this precinct. A contextual analysis should be provided to demonstrate how/if the proposal contributes to a positive pattern of development on the whole urban block, addressing the following:

The proposal appears to provide a nil set back to its southwestern boundary. In places this
will present a blank wall up to 10m in height to the existing neighbouring site. This design
also suggests that future development will adjoin the subject site with a podium of a similar
height. Further analysis of the development potential of the neighbouring site is required to
determine if a nil set back to the southwestern boundary is an appropriate strategy, that will
accommodate an appropriate built form outcome on the neighbouring site.

In regard to sustainability and amenity, the following should be considered:

- The proposed residential flat buildings have large floor plates, with some lobbies containing up to 11 units. It is noted that windows are provided to all lobbies, however, the scale of the lobbies will result in internalised corridors dependent upon artificial lighting. Further development of these circulation corridors is recommended, to embrace Apartment Design Guide (ADG) design criteria 4F 1.
- The proposal's natural ventilation strategy is outlined in drawings DA 4400 and DA 4401. This drawing nominates a number of single sided units as being cross ventilated, however, these units do not appear to meet ADG requirements for natural cross ventilation. The proposal does not currently meet ADG natural cross ventilation requirements (60% of units to be naturally cross ventilated). Further detailed development information is required to demonstrate ADG compliance.

The strong reference has previously been expressed to include the properties to the south of the site to Forest Road, as this would achieve a better outcome in terms of built form and vehicular access, and would allow the impact on those properties to be moderated. If these properties are not included, the impact on them and a viable future development scenario for them should be considered and articulated as part of the application.

Landscape

Frontage Landscape Treatment to Princes Highway

The landscape treatment should be consistent with DCP requirements (Part 7.7 Rockdale DCP), which requires a 6 metre setback with deep soil planting. The Arncliffe & Banksia Public Domain Plan & Technical Manual (July 2020) provides further details of the treatment

required in frontage setbacks and in the public domain related to this site. The tree planting along Princes Highway is imposed in the DCP to improve visual character and pedestrian amenity.

and all the

The site has some existing trees along the Princes Highway frontage which are significant and proposed structures could be redesigned to allow the retention of these trees.

The present scheme provides only a portion of the frontage with trees, and these are above structures. This is not consistent with the DCP. The selected species for this frontage is *Eucalyptus Robusta* to be planted at 400 Litres.

The proposed childcare centre open space must not be located within the 6 metre frontage setback to Princes Highway, as this is intended to be a landscaped buffer. All planting in the interface with the public domain shall follow CPTED principles.

The planter interface with public domain should avoid the inclusion of retaining walls. Soil levels of the planters should match existing natural ground levels present in the public domain.

The proposal must integrate the cycle routes defined in the Arncliffe & Banksia Public Domain Plan & Technical Manual (July 2020) Figure 3.17.

Existing Vegetation

Many significant trees are proposed to be removed. It appears no effort has been made to design around the significant trees on the site. Only some allowances in the design have been made to retain some trees in the public domain and within neighbouring properties.

Trees identified 1, 2, 3, 4, 5 and 105 in the Tree Schedule (Appendix 2) of the submitted Arboricultural Impact Appraisal and Method Statement, prepared by Naturally Trees, should be considered for retention, as these groups of trees provide very significant canopy, privacy and amenity, and are located in the periphery of the built block. All existing healthy trees along the frontage setback should be retained, as these trees are a valuable asset for the community and the environment.

Bayside Council is one of the LGAs with low canopy cover and has a priority to retain and protect as many existing trees as possible. This proposal is not considering Council's or the community's priorities in relation to existing canopy cover.

Proposed Landscape Treatment

As per Council's Green Plan, the development proposal is to maximise tree canopy within and outside the development site. All planting on slab can still considered to be of benefit to the public, though canopy trees are not optimal over slabs. Planting in deep soil areas has known environmental benefits, and trees can fully develop, avoiding conflicts with structures and maintenance issues. The planting in deep soil within the site is limited to 8 x *Liriodendron tulipifera*, which are not native trees. The proposal does not include native planting to offset the canopy loss of the vast number of trees proposed removed.

Artificial turf is proposed on the roof terrace and other areas a sunny aspect. This treatment under the sun absorbs and retains heat, contributing to the urban heat island effect.

From the landscape and environmental perspective, the **proposal fails in providing an ecologically sustainable development**, which by definition means: '*using, conserving and enhancing the community*'s *resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased*'.

Deep Soil

To comply with Objective 3E-1 of the Apartment Design Guide, the proposal should contain a minimum deep soil area of 15% of the site area. The deep soil areas should be a minimum 6 metres wide and will be preferably located along the frontage or rear setback.

Deep soil area provision must be included along the Princes Highway Frontage. If trees are healthy and worthy of retention along this setback, a layout which allows the retention of these trees should be considered.

Stormwater Proposal

The stormwater system should be within the building footprint, and not within the proposed deep soil areas, to allow adequate, uninhibited areas for trees to mature. Water sensitive urban design elements, such as bio-remediation beds to open spaces, could be included as they can be of an effective scale and contribute to park character.

Public Domain Improvements

For specific information regarding Public Domain, the proponent is referred to the Arncliffe and Banksia Public Domain Plan & Technical Manual. The documents call for the following:

- Undergrounding of overhead services to maximise tree canopy opportunities;
- Princes Highway includes a 2.5m wide shared path, include a new paved footpath, pavers to be Vega Black Granite pavement (PA1);
- Retain existing large scale trees located in street reserves or setbacks;
- Reduce excess carriageway areas and lane widths, and provide expanded footpath zones for informal gathering, seating and outdoor dining;
- Provide additional tree planting to provide shade and seasonal colour, in accordance with Council guidelines;
- Provide new rain gardens that can filter street runoff;
- Provide new streetscape elements including furniture and improved pedestrian lighting in accordance with Council guidelines;
- Retain and expand any possible canopy trees;

- The Princes Highway frontage setback must be deep soil with large canopy trees at 10 to 12 metre centres, with the selected species for this frontage being Eucalyptus Robusta to be planted at 400 Litres, planted in a deep soil area of 6 x 6 metres each; and
- Eden Street public domain will include kerbside parking between tree pits planted with Pyrus Calleryana.

Refer to the Arncliffe and Banksia Public Domain Plan & Technical Manual for further details.

Safety and Security

The basement levels comprise a singular open floor plate, particularly the residential parking. This raises concern with security. It is not clearly demonstrated on the plans how access control is provided between the different towers. Separation should be considered.

The recommendations in the Crime Prevention Through Environmental Design (CPTED) Report (Ethos Urban, p.22) should be implemented. The following recommendation in particular is considered relevant, further reinforcing the need to re-examine the location and design of the childcare centre outdoor play area:

Ensure environmental maintenance procedures align with the principles of CPTED, including the minimisation of concealment opportunities and maintaining surveillance opportunities and access control. However, in saying this, landscaping treatments are recommended to be applied to the perimeter of the childcare outdoor space fencing to minimise opportunities for overlooking into this space from members of the public traversing the streetscape.

Flooding

This site is affected by shallow surface flows in the 1% AEP event and PMF Flood event. A Flood Impact Assessment was undertaken by a consultant, which demonstrates that the proposal will have negligible impacts on the existing flooding situation.

Habitable floor level:

There are no flood related development controls for the residential and retail component of the development. It is indicated that all habitable floor levels will be designed at least 300mm above the existing ground level, this satisfies the advice provided in Council's Flood Advice.

The minimum habitable floor for the Childcare centre must be designed above the PMF flood level.

Basement driveway Crest level:

The flood report indicated that the crest will be designed at 1% AEP Flood level. In accordance with Rockdale Technical Specification, section 8, 2011, the basement driveway is to have at least 100mm freeboard over the 1% AEP flood level. The flood assessment report and architectural plans shall be amended accordingly. A screenshot of the driveway design requirement is shown below:

8.2.1 Calculating flows and depths for low level driveways:

a. For properties not identified as affected by mainstream flooding, or overland flows, the driveway crest level is to be a minimum of 100 mm above the 1 in 100 year flow level. The driveway shall also be protected from lateral flows and flows from other sources by incorporating side returns.

Basement walls must be fully tanked to avoid large amounts of seepage entering the drainage pits and pumps in the basement and 24/7 pumping into the road kerb & gutter in the operational stage of the development.

Parking, Traffic & Access

Traffic Impacts

Traffic modelling based on traffic counts from March 2021 do not accurately represent traffic conditions due to changes in behaviour associated with Covid-19.

The traffic intersection modelling results presented are averages of all directions. This implies better performance than reality. For example, the report identifies Princes Highway and Brodie Spark Drive achieving a level of service (LOS) B. When reviewing the detail in Appendix 4, this is clearly not the case. In the PM peak, the intersection of Princes Highway & Brodie Spark (R2) achieves a LOS F, which will worsen due to this development, as there are no alternative ways to enter the site when travelling from the north.

The modelling shows an increase in traffic in the PM peak from 416 to 439 vehicles/ hr. This predicted increase doesn't appear to be appropriate, given the limited alternatives to enter the site.

TABLE 6 SIDRA OUTPUT EXISTING PEAK HOUR PERFORMANCE								
	AM	PM	SAT					
Princes Hwy & Brodie Spark Dr								
Delay Degree of Saturation	23.3 0.79	23.7 0.64	23.9 0.64					
Level of Service	В	В	В					
Brodie Spark Dr & Arneliffe St								

MOVEMENT SUMMARY

Site: 101 [Princes Hghwy and Brodie Sparks Dr (Site Folder:

General)]

PM Peak Existing

Site Category: (None) Signals - EQUISAT (Fixed-Time/SCATS) Isolated Cycle Time = 140 seconds (Site User-Given Cycle Time)

Mov ID	Turn	INP VOLU		DEM. FLO		Deg. Satn		Level of Service		ACK OF EUE	Prop. Que	Effective Stop	Aver. No.	Aver. Speed
		[Total veh/h	HV] %	[Total veh/h	нv] %	v/c	sec		[Veh. veh	Dist] m		Rate	Cycles	km/h
South	: Princ	es Hghw	y South											
1	L2	324	5.0	324	5.0	0.443	24.4	LOS B	12.1	88.3	0.60	0.75	0.60	25.8
2	T1	1543	5.0	1543	5.0	0.554	21.5	LOS B	24.9	181.6	0.68	0.61	0.68	41.4
Appro	bach	1867	5.0	1867	5.0	0.554	22.0	LOS B	24.9	181.6	0.67	0.64	0.67	39.4
North	: Prince	es Hghwy	y North											
8	T1	2459	5.0	2459	5.0	* 0.640	13.4	LOSA	31.1	226.9	0.62	0.57	0.62	46.8
9	R2	416	5.0	416	5.0	0.541	58.6	LOS E	12.7	92.8	0.94	0.82	0.94	23.1
Appro	bach	2875	5.0	2875	5.0	0.640	20.0	LOS B	31.1	226.9	0.66	0.61	0.66	41.7
West	Brodie	e Sparks	Dr											
10	L2	215	5.0	215	5.0	0.161	36.4	LOS C	4.8	35.3	0.71	0.74	0.71	29.7
12	R2	238	5.0	238	5.0	* 0.620	70 <mark>.6</mark>	LOS F	8.0	58.1	1.00	0.80	1.01	13.4
Appro	bach	453	5.0	453	5.0	0.620	54 <mark>.4</mark>	LOS D	8.0	58.1	0.86	0.77	0.87	20.3
All Ve	hicles	5195	5.0	5195	5.0	0.640	23.7	LOS B	31.1	226.9	0.68	0.63	0.68	38.6

Site Level of Service (LOS) Method: Delay (RTA NSW). Site LOS Method is specified in the Parameter Settings dialog (Site tab). Vehicle movement LOS values are based on average delay per movement. Intersection and Approach LOS values are based on average delay for all vehicle movements. Delay Model: SIDRA Standard (Geometric Delay is included). Queue Model: SIDRA Standard.

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

* Critical Movement (Signal Timing)

The reporting from the modelling appears to be selectively used. This development will make an existing problem area worse, and Council has no way to resolve the problem, as the main access roads are State Roads. Modelling must be peer reviewed.

The applicant needs to liaise with TfNSW to determine the modelling requirements and appropriate design requirements for the intersection of the Princes Highway with Allen or Burrows Street, to accommodate southbound right-turn movements for this proposed development.

Vehicular access to this development is significantly impaired due to the lack of right turn movements at various intersections along Princes Highway and Forest Road on approach to the site. This, combined with modifications to the intersection of Eden Street with Forest Road to be left-in/ left-out only (prohibiting right turn movements into Eden Street) results in the only southbound right turn access to the development being via the intersection of Brodie Spark Drive and Princes Highway.

The intersection of Brodie Spark Drive and Princes Highway (southbound right turn movements) and the road network of Wolli Creek cannot accommodate the additional traffic generation from this development. Wolli Creek is a high pedestrian area, and this intersection has poor intersection performance (F – for turning right off Princes Highway).

This development triggers the need for additional right turn movements at Allen Street or Burrows Road from the Princes Highway to provide connection to this development that avoids vehicles using Brodie Spark Drive. The applicant needs to liaise with Transport for NSW (TfNSW) to determine an appropriate design at the intersection of Allen or Burrows Street to accommodate southbound right-turn movements.

Modifying the Eden Street intersection also has the potential to negatively impact the Firth Street/ Forest Road intersection, which needs to be assessed and investigated to understand what impacts will be created.

Vehicular Access

The proposed vehicular access design to Eden Street involves three driveways. These three driveways all placed adjacent to each other result in an excessively large 29m wide driveway that has significant detrimental impacts upon the public domain, and is not supported. Furthermore, these three driveways are all located at a significant bend of Eden street, where sight distances are significantly constrained.

This excessively large driveway width (29m) needs to be reduced in size whilst still functioning correctly as per Australian Standards. To achieve this, the design of the parking facility needs to be amended to facilitate the movements of service vehicles to the loading dock via the same driveway as the basement vehicular access.

Given the sight distance constraints identified in the traffic report associated with the bend in Eden Street's alignment, a Category 4 driveway access is not considered appropriate for the development and instead, a Category 5 vehicular access driveway (i.e., intersection) must be provided for this development. This aspect is already acknowledged in the traffic report. However, the current design of the intersection is not supported as it does not appropriately resemble an intersection.

The vehicular access needs to be entirely redesigned to properly reflect an intersection design as per AS/NZS2890.1:2004 section 3.1.1. This will require some opening up of the area and building around the intersection and the provision of a far longer length with a flatter gradient. Additionally, the intersection needs to be set back as far as feasibly possible from the bend in Eden Street. A safety concern is raised regarding the location of the southernmost driveway within close proximity to the bend on Eden Street. The sight distance of 50m to the south is inadequate and less than the required 69m, and the seagull treatment (s1.3.6) proposed does not fully mitigate risks.

The applicant hasn't provided detail to demonstrate whether the road width is adequate for the changes proposed, including provision of seagull treatment and the proposed bidirectional separated cycle path (as per Arncliffe and Banksia Public Domain Plan).

The treatment appears to show movement from the south (right turn) into the building is only to the private vehicle parking area (not loading zone). The swept path plans only show movements to and from site via the north. There is no swept path diagram for heavy vehicles exiting the site to the south. This plan shows vehicles existing to the north only. If there are restrictions on exiting to north only signage must be clear to prevent inappropriate left turns to south.



There are two driveways (resident and commercial) next to each other. It will no doubt be a very large driveway and must have Signals/Warning systems for exiting drivers and alerting pedestrians on the footpath.

It is recommended that entry to the basement lower parking levels should include a setback area at street level in case a vehicle breaks down and totally blocks access into or out of the development

The loading dock should be completely redesigned so that it does not rely on a separate vehicular crossing. Furthermore, the seagull intersection needs to be carefully designed to ensure it meets Australian Standards, Austroads and Council requirements. To ensure it is designed well, some road widening may be necessary.

Other associated issues include:

- Swept paths depicted on sheet 14 and 15 (pages 88 & 89) of the Traffic Report indicate further issues with the design of the vehicular access and seagull intersection. The design forces vehicles to drive in the oncoming lane at poor angles in order to enter/ exit the driveway. This permanent arrangement is dangerous and will not be supported. These swept paths indicate that right turn entering/ exiting the site will be particularly difficult for motorists and not conducive to a safe intersection;
- The swept paths on sheet 16 (page 90) do not accurately reflect the architectural plans (near the bicycle parking). They must be revised to accurately reflect the architectural plans;
- It needs to be demonstrated that the painted seagull intersection treatment will feasibly work within the road carriageway of Eden Street. The developer will be responsible for all costs associated with constructing this seagull intersection;
- A queueing analysis/ assessment must be undertaken in accordance with Australian Standards for the vehicular entry;
- Intersection performance must be assessed for the development's required intersection with Eden Street;
- Suitable stop/ give way signage must be incorporated into the design of the intersection; and
- Current swept path design of service vehicles into the site is not supported.

It needs to be demonstrated that it is feasible for an articulated vehicle (AV) to reach this site. Swept path analysis (complying with Australian Standards) must be provided for assessment along the entire inbound and outbound travel path through the local road network from the State roads. It is noted that a 14.5m long AV does not comply with AS2890.2:2018, which states that AVs typically have a length of 20m.

This proponent should consider providing an easement for vehicular access through the basement that benefits the properties of 181 Princes Highway and 7 Forest Road (including designing the basement to facilitate a future breakthrough). This will enable these sites to utilise this development's basement to achieve vehicular access to Eden Street (local road network) in their future re-development. Otherwise, when redeveloped, these sites will be forced to provide a driveway to the classified road network in a very poor location.

Parking

The site is located within 800m of Arncliffe Station, which means that the RTA Guide to Traffic Generating Development Rates (Metropolitan Sub-Regional Centres) are applicable to this development, not the RDCP2011 parking rates. The development provides residential "market" parking in accordance with this parking rate and is supported. The social housing dwellings are provided with car parking spaces that meet the requirements of the ARH SEPP, which is supported.

The Rockdale DCP 2011 bicycle parking rates are very low and outdated. The development should be revised to provide an increased bicycle parking provision at a rate of 1 space per 2 dwellings as a sustainability measure. Bicycle parking should be provided for the non-residential component at a rate of 1 space per 150m² GFA, with suitable end of trip facilities.

Section 4.7 of the traffic report indicates that the development does not comply with the Rockdale DCP 2011 bicycle parking rate provision, because there is sufficient area in the residential storage cages for bicycles. The applicant's proposed use of the storage cages for bicycle parking is not supported. All bicycle parking spaces should be provided in a dedicated secured bicycle parking area (monitored by CCTV) and the bicycle parking spaces designed in accordance with AS2890.3:2015 for the applicable user class.

The development is also required to provide car wash bays at a rate of 1 per 60 units, dimensioned 3.5m wide and bunded with all run-off going only to the sewer (Rockdale Technical Specification Stormwater Management section 7.5.5). It may be considered to have some car wash bays shared with visitor parking spaces.

The childcare parking spaces must be clearly shown on the plans. The parent pick-up/ dropoff spaces are to be at least 2.6m wide and have separated access directly to the childcare facility (so that parents and children do not have to walk through the car parking aisle).

Providing retail parking at the Rockdale DCP 2011 rate is acceptable however, all 78 spaces need to be provided for use by retail visitors (not 66). Staff parking can be provided separately. The parking spaces for retail visitors will need to be secured via boom gate and have a limited timed period of free parking, to deter all day commuter/ residential parking not associated with the retail component of the development.

Car share spaces can only be provided internally within the development site, not on-street.

Loading/Unloading & Waste Collection

The proposed loading & unloading provision within the loading dock (2 AV loading spaces, 1 Council waste collection bay and 3 MRV loading bays) is considered acceptable. However, the ability for loading/ unloading to occur for residents in Towers A & B is questioned due to how far away the loading dock is from Towers A & B. To ameliorate this issue, a few van loading/ unloading spaces could be provided in locations as close as possible to the lift lobby for Towers A & B within the basement.

All waste must be able to be adequately transported up to the loading dock for collection within the loading dock, as on-street waste collection is not permitted and bins are not permitted to be presented to the street for collection. A loading dock management plan is required to be provided.

Construction vehicle access

S9.4 Construction assumes all inbound construction traffic is from the south. This assessment is only acceptable if there is a restriction on all construction vehicles to only enter from certain streets.

The report identifies all materials from the site will be removed using the roads Eden Street / Forest Road / Wickham Street / West Botany Street / Marsh Street and finally the M5, but it does not describe how heavy vehicles will access the site. It appears the Traffic Assessment and CTMP are deliberately avoiding the access to this site as the only access to this site from the north will be via Princes Highway / Brodie Spark Drive / Arncliffe Street / Burrows Road, and finally, into Eden Street.

Construction vehicle access must be limited to entry and exit via Eden Street/ Forest Road intersection or Burrows Road/ Princes Highway intersection. No access to construction vehicles to Burrow Road west of Eden Street, Brodies Spark Drive or Arncliffe Street.

The CTMP also states all worker vehicles will be contained on site in the basement parking levels. This would not occur for at least 12 months while these lower parking levels are constructed.

The applicant must provide a Parking Management Plan for construction workers. The Parking Management Plan must consider parking away from the site and transport of workers to the site. The plan must reflect the number of workers at various stages of construction. The plan is not to rely on construction workers parking in nearby residential streets due to the impact on residential amenity in the adjoining area.

Sustainable Transport

This development needs to provide and promote sustainable transport options to decrease the prevalence and reliance on unsustainable transport options. To achieve this the following is to be addressed at minimum:

- a) The amount of car spaces equipped with electric vehicle (EV) charging facilities shall be increased to be a minimum of 20% of all proposed car parking spaces within the development (with the 20% being split proportionally between all uses in the development). The EV charging points shall be provided as 'Level 2' charging infrastructure with a power range of 7kW-22kW, as defined by NSW Electric and Hybrid Vehicle Plan, Future Transport 2056. The designs and allocation of EV charging points is to comply with the following:
 - i. Privately available spaces shall be designed with 'Level 2' slow charging points single phase with 7kW power;
 - ii. Publicly available spaces shall be designed with 'Level 2' fast charging points three-phase with 11-22kW power;
 - iii. The development shall provide either buried cables or cable trays sufficient to accommodate the electric circuitry to each car space required to provide EV charging points. Electrical load management requirements shall be identified, and it shall be confirmed that there is an adequate distribution board size provided for the electric vehicle charging point system;
 - iv. The loading dock of the development shall also implement an EV charging point suitable for an EV truck;

- v. Nominated car share spaces operated by a commercial car share operator, car share spaces shall be provided at a rate of 1 space per 100 dwellings. These car share spaces shall be in a publicly accessible area within the development, and
 - Provision of residential bicycle parking at a rate of 1 space per 2 dwellings.
 - Provision of commercial bicycle parking (at a rate of 1 space per 150m2 GFA) and appropriately designed end of trip facilities to match the scale of the development and bicycle parking provision.

Pedestrians

Pedestrian movements across Forest Road from this site will significantly increase to Wardell Street and the school and Arncliffe Youth Centre with no safe pedestrian passage. Fencing is strongly recommended along the entire Forest Road frontage between Princes Highway and Firth Street to encourage vulnerable pedestrians to use traffic signals either at Princes Highway or Firth Street.

Stormwater Management

On-Site Detention

On-Site Detention (OSD) is required as part of this development, in accordance with Section 6 of the Rockdale Technical Specification: Stormwater Management. The OSD design is to be revised to be provide a "nested storage", in accordance with Section 6.3 of this technical specification. It is to be demonstrated that Section 6.7 of the technical specification is complied with. Furthermore, it is not clear on the plans as to where OSD tank 1 discharges. Amended plans are to be provided for assessment.

All stormwater run-off is to discharge into underground stormwater infrastructure, no kerb outlets are permitted.

Bayside Council will require a positive covenant to be registered on the title of the land where OSD and Stormwater Quality Improvement Devices (SQIDS) are present, to ensure their ongoing maintenance, as per Rockdale Technical Specification Stormwater Management. This can form part of the conditions of consent.

While not required by Council, there is potential to provide 'smart' detention at this large site, in a relatively small catchment that could mitigate the risk of coincidental peaks and time discharge for low tide periods. There is a risk of the detention on site resulting in coincidental peaks within the catchment (with the Wollongong Road and Bonar Street stormwater networks) that meet at a restriction under the SWSOOS, just upstream of the Bonnie Doon Channel.

During high tides this pipe is outlet controlled and there is no discharge often resulting in flooding in lower reaches of the catchment particularly Arncliffe Street at Guess Avenue. There is potential for this development site to investigate and implement the use of smart technology to release at low tides (without detention) and to retain during high tides, for release either once capacity of tanks is reached or during next low tide.

Water Sensitive Urban Design

The development requires the use of a Water Sensitive Urban Design Approach (WSUD) to the design of the drainage system. Rockdale Technical Specification Stormwater Management Section 7.5 requires the development to confirm the targets for the stormwater

pollution reduction and to justify the target by an analysis using MUSIC. This has been demonstrated and the proposed SQIDS, swales and rainwater tanks are acceptable.

The report and MUSIC modelling indicate that 6 x 25kl rainwater tanks are proposed for the development, which is strongly supported by Council and complies. However, it is not clear as to where the rainwater tanks are located on the plans provided, so they must be clearly shown on the plans. These rainwater tanks must be designed to be connected for internal non-potable stormwater re-use, with the re-use being maximised. To maximise re-use, connections should be provided to all ground level & lower ground level landscape irrigation, all car wash bays, all ground level & lower ground level toilet + urinal flushing, and the cold water tap that supplies all clothes washers in the ground level and lower ground level. A landscape irrigation system must be provided in the park.

Subsurface Structures

The basement levels are required to be designed as a fully tanked and waterproof structure due to the presence of shallow groundwater table. No groundwater is permitted to enter the basement. Subsoil drainage around the subsurface structure must allow free movement of groundwater around the structure but must not be connected to the internal drainage system. No pump-out is permitted to drain and discharge groundwater seepage from the basement to the stormwater system. The pump-out system for the basement needs to comply with AS/NZS 3500.3:2018.

The stormwater system in the parking facility and loading dock must incorporate an oil separator in accordance with Rockdale Technical Specification – Stormwater Management before the run-off is discharged from the site. Basement stormwater drainage plans are to be provided for assessment.

Public Domain

Arncliffe and Banksia Public Domain Plan

The applicant must address the proposed upgrades to the Public Domain, as identified in the Arncliffe and Banksia Public Domain Plan & Technical Manual. These proposed upgrades are to be incorporated into the detailed design plans, and are required to be constructed as part of the development – with particular attention to the upgrades along Princes Highway, Eden Street and Eden Park, as mentioned in each respective section of the Manual.

The applicant is responsible for carrying out and funding the proposed works for the entire width of the site frontage to Princes Highway & Eden Street, as well as Eden Park. The extent of works must include, but is not limited to, the below mentioned upgrades as per the Arncliffe and Banksia Public Domain Plan & Technical Manual. The extent of works must specifically include the following:

- The full width and extent of a new bi-directional bicycle lane on Eden Street from Forest Road to Burrows (note that since the Arncliffe and Banksia Contributions Plan levies for this, a funding arrangement may be entered into with Council);
- A raised painted pedestrian crossing connecting the through site link and arcade towards Arncliffe Station;
- Public domain street scape upgrade works along the full frontage of the site including new footpath, street tree planting, undergrounding of all overhead wires on Princes Highway and, removal of redundant Ausgrid poles and installation of underground supplied street

lighting columns along both frontages. The new footpaths on Eden Street shall be 2.8m wide and the footpath on Princes Highway shall be 2.1m wide.

Note: Some upgrades that impact the road carriageway will require approval from the Bayside Council Traffic Committee, and subsequently endorsed at a Council meeting.

Refer to the below extract from the Arncliffe and Banksia Public Domain Plan & Technical Manual. The applicant shall refer to the full Manual for more detail.





5. Eden Street Park

Addressing the desired place character for public domain

....a place connected to the natural riverine environment that provides an enduring, quality and simple canvas for street and community life to evolve ...

En	vironment			Cult	ture			Community			
i. II.	for local catchment and local flood mitigation			 providing visual links to heritage building providing a multi purpose village green suitable for small gatherings and events integrating a permanent piece of public art that interprets the past residential community of local social housing 			 providing a mutlipurpose space to families and all age groups fo of activities 			and all age groups for a range	
iii.							ii.	providing pleasant spaces for older active users to sit and watch activity			
Ap	plying the public domai	n pri	inciple	s							
	function			cha	racter		comfort				resilience
	function pathway connections connecting Princes Highway to Eden Street and Arncliffe Station	ii. U	urban pa Use com	ark ch nbinat			shaded seating area and south edges of p	s set t bark		i.	resilience bioremediation feature to treat local road runoff and be landscape feature as central
i.	pathway connections connecting Princes Highway to Eden Street and Arnoliffe Station address level changes east to	ii. U F F	urban pa Use com PA2 (hon PA3 (san	ark ch hbinat hed in hdstor	aracter ion of pavements situ concrete) and ne)		shaded seating area	s set t bark		i.	bioremediation feature to treat local road runoff and be landscape feature as central feature within park - potential fo
ii. iii.	pathway connections connecting Princes Highway to Eden Street and Arncliffe Station	ii. U F Iii. r iv. 7	urban pa Use com PA2 (hon PA3 (san maximise 70% nati	ark ch nbinat ned in ndstor e exis ve tre	aracter ion of pavements situ concrete) and	ii. iii.	shaded seating area and south edges of p southern seating to n	s set t bark naximi	ise	i. ii.	bioremediation feature to treat local road runoff and be

v. integrate at grade access to

Princes Highway by external lift

Sustainability

seating

v. picnic tables and bins

seating platforms and park

This development is in a Design Excellence area, and needs to demonstrate an excellence in sustainability, which must include, but not be limited to, the following measures:

Addressing sustainable transport requirements mentioned previously;

buildings to north and south

vii. Integrate permanent public art

element as part of design

- The extent of the PV system is to be increased to ensure that the rooftops of all buildings • incorporate the provision of Photovoltaic Cells that maximise the use of available nontrafficable rooftop space;
- Maximisation of non-potable stormwater re-use of the lower ground level & ground level of the development including all landscape irrigation, clothes washers, toilets and car washing;
- Zoned and sensor-controlled lighting and air conditioning should be provided as part of the development;
- Use of LEDs and other low energy flicker free lighting resources;
- Use of water saving appliances above and beyond BASIX requirements;
- Provide ample recycling storage rooms; •
- Use of blast slag, fly ash or other pozzolan admixtures in concrete to minimise cement and reduce embodied carbon;
- Extensive use of planters on interior and exterior to the buildings including provision of • additional green walls, green roofs etc.; and

• Provide separate circuiting for temporary power to minimal stair and corridor lighting.

Geotechnical

The applicant shall provide a Geotechnical Engineering Report that addresses (but is not limited to) the following:

- The type and extent of substrata formations by the provision of a minimum of two representative bore hole logs which are to provide a full description of all material from the ground surface to 1.0m below the proposed lowest basement floor level and include the location and description of any anomalies encountered in the profile. The surface and depth of the bore hole logs shall be related to Australian Height Datum;
- The appropriate means of excavation/shoring in light of the above point, and proximity to adjacent property and structures. Potential vibration caused by the method of excavation and potential settlements affecting nearby footings/foundations/buildings shall be discussed and ameliorated;
- The proposed method to temporarily and permanently support the excavation for the basement adjacent to adjoining property, structures and road reserve if nearby (full support to be provided within the subject site); and
- Recommendations to allow the satisfactory implementation of the works.

The Geotechnical Report must be prepared by a suitably qualified Geotechnical Engineer that is experienced in these relevant investigations and reporting.

Section 7.11 Contributions

The applicant implies the s.7.11 contributions will go towards a shared pedestrian/ cycle path along the western Princes Highway footpath between Forest Road and Burrows Street. This is incorrect, as there is no provision in the Arncliffe and Banksia s.7.11 Contributions Plan to provide for public domain works in front of private property. The provision of this shared pedestrian/ cycle path on Princes Highway is to be delivered by the applicant as part of their public domain works. The full cost is to be borne by the developer.

The applicant also proposes modification of existing pedestrian refuge to prevent right turns from Forest Road into Eden Street (and enforce left-in/ left-out movements), with s.7.11 funds. This is not provided for in the Contributions Plan either, and therefore cannot be funded by the Contributions Plan. The developer is to fully fund the cost of these works.

The Contributions Plan allows for the following transport works – on existing footpaths:

MAP REF.	WORK ITEM	ESTIMATE	CATCHMENT	APPORTION	APPORTIONED COST	INDEXATION	TIMING SHORT, MEDIUM LONG TERM
Transp	ort – Cycleways						
9	Separated bike paths	\$6,718,858	Local	100.00%	\$6,718,858	PPI	Medium
10	Shared cycleway on existing footpath. Only to be installed in locations that are not currently 2.5m wide and in areas that will not be developed.	\$315,592	Local	100.00%	\$315,592	PPI	Medium
11	Bicycle Shoulder Lanes	\$134,052	Local	100.00%	\$134,052	PPI	Medium
12	Onroad shared lanes	\$333,242	Local	100.00%	\$333,242	PPI	Short
Not	Bicycle parking cages and racks at town centres	\$40,000	Local	100.00%	\$40,000	PPI	Short

Council requests that the following condition form part of the consent:

Section 7.11 Contributions

Council requests that the following condition be applied to the consent:

Section 7.11 Contributions

A Section 7.11 contribution of \$12,183,162.07 shall be paid to Council.

The contribution is calculated according to the provisions contained within the Council's adopted Arncliffe and Banksia Local Infrastructure Contributions Plan 2020.

The amount to be paid is to be adjusted at the time of payment, in accordance with the review process contained in the Contributions Plan.

The contribution is to be paid prior to the issue of any Compliance Certificate; Subdivision Certificate or Construction Certificate.

The contributions will be used towards the provision or improvement of the amenities and services identified below:

Transport		3,824,798.57
Stormwater Management		558,565.51
Open Space		2,407,660.09
Community Facilities		5,260,526.26
Administration		131,611.66
	Total in 2021/22	12,183,162.07

Special Infrastructure Contributions

Council notes that the site is located in a 'Special Contributions Area' under section 7.1 of the EPAA and that contributions will also be payable under this scheme.

Property

Council staff provide the following comments in relation to property:

- The proposal provides approx. 4,870 sqm of open space including a 4,000 sqm park and 870 sqm public plaza. This space is to remain in the ownership of LAHC, or controlled through a community association established through a strata scheme, and it will be necessary to ensure the general community has access rights to use this space through covenants, rights of way, and/or easements. It is important these rights extend to the through site links. A condition should be placed on the consent requiring the proponent to liaise with Council staff in regards to the detail of this.
- The project documentation notes one of the key objectives is to provide private market, affordable and social housing. It is noted that 180 social housing units are concentrated within Building C, which appears contrary to the LAHC's policy to deconcentrate social housing.

Plans and Documentation

There are no elevations or dimensioned setbacks shown for the plant room behind Tower C. The reliance on the rendered image of the area is insufficient. Dimensioned plans and elevations are to be submitted in addition to the section and rendered imagery.



Overshadowing to the southwestern neighbouring properties, particularly 52-54 Eden Street, 7-25 Forest Road and 181 Princes Highway, needs to be shown.

The Plant and Loading area on neighbouring properties presents an aggressive interface with a 10.1m high blank wall to the southwestern boundary and should be setback behind a landscaped buffer that is planted in scale with this element.

The southern corner of the site, in the location of the electricity substation and fire hydrant booster, is not clearly shown on the elevations. Concern is raised as to the visual impact of these services at the street edge and how the hydrant booster interfaces with the adjoining property. They should be as concealed as possible.

Additionally, there are no dimensions found on any of the floor plans above ground level.

CONCLUSION

The land has been zoned and identified for very significant uplift and identified as a landmark site that can accommodate significantly more development that any other site in the locality, including social housing. Council supports the provision of social housing and the development generally, provided it complies with and respects the detailed, recently applied planning controls and policies. There is no reasonable justification for the development not to comply given this context.

There are a number of very serious issues that need to be resolved, especially traffic, access and movement to and around the site generally. The creation of a comfortable and attractive environment at ground level is also critical through greater consideration of tree retention, canopy tree planting, and integration with the public domain as envisaged in the applicable plans.

Council requests that the issues raised in this submission be carefully considered and would be happy to work with the DPIE and proponent on reviewing solutions.



15 December 2020

Our Ref: 20/328941 Contact: Josh Ford - 02 9562 1634

Mr Marcus Jennejohn Senior Planning Officer - Key Sites Assessments Department of Planning, Industry and Environment Locked Bag 5022 PARRAMATTA NSW 2124

Via Major Projects Portal: https://www.planningportal.nsw.gov.au/major-projects

Dear Marcus.

Re: Eden Street Site Redevelopment [SSD 11429726] - Draft Secretary's Environmental **Assessment Requirements**

Thank you for the opportunity to provide input into the draft Secretary's Environmental Assessment Requirements (draft SEARs) in relation to the State Significant Development Application for the Eden Street Site Redevelopment.

The Proposal:

Council understands that Ethos Urban (the consultant), on behalf of NSW Land and Housing Corporation (LAHC) and Billbergia Group Ltd, has contacted the Department of Planning, Industry and Environment (DPIE) to request that the DPIE issues SEARs for the following proposed development at the site as described in the Scoping Report:

- Construction of a mixed use development comprising:
 - 714 residential apartments within four buildings, including 180 social housing apartments;
 - approximately 4,235sqm of retail/commercial floor space;
 - a child care centre for 90 children and 28 staff;
 - a public open space of 4,000sqm;
 - 950 car parking spaces within 3 levels of basement car parking; and
 - A potential Community Facility.

Council wishes to note the following:

Under clause 8 (1) of State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP), development is declared to be State Significant Development (SSD) if:

Postal address	Bayside Customer Service Centres	E council@bayside.nsw.gov.au
PO Box 21, Rockdale NSW 2216	Rockdale Library, 444-446 Princes Highway, Rockdale	W www.bayside.nsw.gov.au
ABN 80 690 785 443	Westfield Eastgardens, 152 Bunnerong Road, Eastgardens	T 1300 581 299 02 9562 1666

Теlephone Interpreter Services: 131 450 Τηλεφωνικές Υπηρεσίες Διερμηνέων بخدمة الترجمة الهاتفية 電話傳譯服務處 Служба за преведување по телефон

- (a) the development is permissible with consent under Part 4 of the Environmental Planning and Assessment Act 1979 (EPAA); and
- (b) is declared State Significant Development if the development is specified in Schedule 1 or 2 of the SRD SEPP.

In relation to (a), the proposal is permissible with consent under the Rockdale LEP 2011.

In relation to (b), the proposed development is on land identified as a NSW Land and Housing Corporation Site on the State Significant Development Sites Map, is being carried out by the NSW Land and Housing Corporation, and has a capital investment value of more than \$30 million; and therefore satisfies the requirements of Clause 10 of Schedule 2 of the SRD SEPP.

Bayside Council General Comments

Council has no objection to the proposal being declared SSD under the provisions of the SRD SEPP, provided the following matters are dealt with comprehensively in any Environmental Impact Statement (EIS) which accompanies a Development Application for the proposal:

• Strategic Planning –

The EIS should demonstrate that the development proposal is generally consistent with all relevant planning strategies, plans and Environmental Planning Instruments, including:

- Greater Sydney Region Plan A Metropolis of Three Cities;
- Eastern City District Plan;
- South East Sydney Transport Strategy;
- Bayside West Precincts 2036 Plan;
- Arncliffe and Banksia Green Plan;
- Better Placed;
- Draft Social Impact Assessment Guideline State significant projects [October 2020];
- State Environmental Planning Policy (State and Regional Development) 2011;
- State Environmental Planning Policy (Affordable Rental Housing) 2009;
- State Environmental Planning Policy No 65–Design Quality of Residential Apartment Development and the accompanying Apartment Design Guide;
- State Environmental Planning Policy No 55-Remediation of Land;
- Bayside Community Strategic Plan;
- Bayside Local Strategic Planning Statement;
- Rockdale Local Environmental Plan 2011;
- Bayside Design Excellence Guidelines; and
- Consideration of the objectives and controls contained in the Rockdale DCP 2011, in particular, Chapter 7.7 Arncliffe and Banksia; and the Arncliffe and Banksia Public Domain Plan and Technical Manual.

Rockdale Local Environmental Plan (LEP) 2011

Zoning

The subject site is currently zoned B4 Mixed Use under the Rockdale LEP 2011. The zoning accommodates a range of permissible uses that are consistent with the objectives of the zone and can contribute to a variety of land use planning outcomes consistent with the zone. The uses identified in the SSD proposal are permitted with consent in the zone, subject to development consent. The uses identified in the proposal are considered to potentially include some, or all, of the following, subject to the assessment and final determination of the proposal:

- Centre-based child care facilities;
- Commercial premises;
- Community facilities;
- Recreation Area; and
- Shop top housing.

Minimum Lot Size

No minimum lot size currently applies to the subject site.

Height of Building

The current applicable height of building control is 70 metres, which the proposal will need to comply with. This height of building control is significantly greater than for any other site that was amended by the SEPP (Arncliffe and Banksia) 2018. Any variation to building height that may be sought will require DPIE to consider significant justification as to why the development standard is unreasonable or unnecessary in the circumstances of the case. The land is located close to Sydney Airport, and given the Obstacle Limitation Surface applicable to the subject site, referral will be required to the Department of Infrastructure, Transport, Regional Development and Communications.

Floor Space Ratio

The current applicable floor space ratio control is 4:1. This floor space ratio is significantly greater than for any other site that was included in the SEPP (Arncliffe and Banksia) 2018. As such, any proposal to vary the floor space ratio beyond this limit will require DPIE to consider significant justification as to why the development standard is unreasonable or unnecessary in the circumstances of the case.

Design Excellence

The subject site is situated within the "Arncliffe Precinct" of the Design Excellence Map under the Rockdale LEP 2011. Clause 6.14 Design Excellence of the Rockdale LEP 2011 includes objectives and provisions relating to design excellence. Council are aware that the State Design Review Panel (SDRP) have previously considered design excellence for the proposal.

Any further refinements or amendments to the design would require the SDRP to reconsider whether the proposal retains design excellence, especially where any alterations to the number of storeys, the public domain or the composition of uses (and any resultant physical design changes) are proposed.

Active Street Frontage

The Princes Highway frontage of the development site is identified on the Active Street Frontages Map of the Rockdale LEP 2011.

Clause 6.1 – Active Street Frontages of the Rockdale LEP 2011 requires all premises on the ground floor of the building facing the Princes Highway to be used for the purposes of business premises or retail premises. The following section identifies the requirements of the Rockdale DCP 2011 chapter 7.7 Arncliffe and Banksia, including active frontages in the locality. As a result of the provisions in the Rockdale LEP 2011 and Rockdale DCP 2011, residential apartments cannot be supported at ground level on either the Princes Highway or Eden Street frontages of the subject site.

Heritage

The subject property is within the vicinity of a number of heritage items, which are outlined in further detail later in this correspondence.

Rockdale Development Control Plan (DCP) Chapter 7.7 – Arncliffe and Banksia

The proposal will need to comply with the provisions of Rockdale DCP chapter 7.7 Arncliffe and Banksia. The DCP chapter came into effect following the notification of the State Environmental Planning Policy (Arncliffe and Banksia Precincts) 2018. The DCP chapter identifies general development controls for the entire area subject to the DCP chapter, as well as specific controls relating to each Special Character Area, including the Arncliffe Town Centre precinct, which the subject site is located within.

Some of the key provisions in the DCP chapter applying to the subject site include (but are not limited to):

- Eden Street and Burrows Street become retail streets, complementing Firth Street and extending the Town Centre uses and activity to the east of the rail line. Streetscape improvements delivered alongside development will further enhance the character and amenity of these streets;
- Retain active uses and street edge alignment to the corner of Eden Street to mark entry into the Town Centre;
- Existing and new pedestrian links improve access to the railway station and create a more walkable centre;
- Eden Street Park is a new local park catering to new residents with a centrally located lawn, gardens and significant tree planting.
- Taller buildings near the station visually reinforce the area as a centre and assist in highlighting the location of key connections and open spaces.

- Ensure retail and business uses are provided at the ground level of existing and planned retail streets particularly on Eden Street and Burrows Street and sites adjoining Wooroona Reserve to the east;
- Development adjoining Princes Highway and parts of Eden Street should provide showroom and other commercial uses at lower levels;
- High-quality residential development is encouraged above retail and commercial uses within the town centre, and as a standalone use on sites outside of the centre;
- Tall towers on larger sites should be slender and well proportioned;
- Provision of high quality residential amenity in terms of privacy and built form by complying with SEPP 65 - Design Quality of Residential Apartment Development, side and rear setbacks must follow built form separation standards as outlined in Part 2F Building Separation as outlined in the Apartment Design Guide;
- Side setbacks are to include deep soil zones and appropriate landscaped treatment;
- Building height controls should allow for generous 7 metre floor to ceiling heights for ground level showroom uses along the Princes Highway. This additional height would allow for small mezzanine levels to be incorporated;
- Retain street edge alignment and active frontages at the corner of Eden Street at Forest Road;
- A front setback of 3 metre is required, unless a specific setback is recommended in 4.1 Building Setback of this chapter;
- 6 metre setback and provision of a positive covenant applying to this setback, for the purposes of permitting unrestricted access for public thoroughfare, landscape and public domain maintenance on sites adjoining the Princes Highway. Where a site has more than one frontage, this requirement shall apply to each street frontage. Proposed landscape improvements include significant 'boulevard tree planting and the creation of a dual footpath that allows for the staged delivery of the setback and continued pedestrian access during transition.
- A new park to be delivered through the redevelopment of the Housing NSW site on Eden Street;
- New through site links between Princes Highway and Eden Street.

Furthermore, the subject site is referenced in more than one section of the DCP chapter, noting the section dedicated to "*Eden Street Development Site, Arncliffe Town Centre*". The controls are very clear and provide direction to the proponent around various matters which are specific to the site and all controls must be addressed.

General controls are included in the DCP chapter that require the proponent to demonstrate how matters like traffic, public domain, and tree planting are to be considered.

It is Council's expectation that a thorough assessment of the SSD be undertaken against the DCP chapter, and the broader controls in the Rockdale DCP 2011, to ensure that the proposal complies with the various controls. Council adopted the DCP chapter in October 2019, so it should be noted that the controls are current, and have been implemented when considering the various merits-based assessments of Development Applications since that time.

Development Contributions and Public Benefit

The draft SEARs request the EIS to address the *Arncliffe and Banksia Local Infrastructure Contributions Plan 2020* (Contributions Plan), and to 'provide details of any additional or alternative public benefits to be derived from the preproposal together with the mechanism for their delivery, to be agreed with Council, the Department and relevant State agencies.'

Council staff note that the following items are identified in the Works Schedule for Community Facilities (Works):

- New Library
- Multi-Purpose Centre

To date, the detailed requirements for, and location of, these items of social infrastructure have not been finalised, nor endorsed, by Council. Additional location specific information is required to determine the scale and nature of the facility required, and whether the Eden Street site is an appropriate location, and whether the timing of partially delivering the assets (cold shell fitout only) at this point in time is appropriate.

Draft Social Impact Assessment Guideline – State Significant Projects [October 2020]

Reference is made to the Department of Planning, Industry and Environment's draft Social Impact Assessment Guideline (Guideline) for State Significant Projects.

The requirements of the SIA are not sufficiently targeted to providing an evidence base for a community facility in this particular location.

It is therefore requested that the proponent prepare a Social Infrastructure Study (SIS), taking into account such matters as current Council facilities and items listed in the s7.11 and s7.12 Local Infrastructure Contributions Plans in the context of forecast population growth and demographic profile to (i) demonstrate the need for a Multi-Purpose Centre and Library in this particular location; and (ii) its intended function(s), to provide Council with a sufficient evidence base to inform their decision making.

Should the SIS determine that the Multi-Purpose Centre and/or Library are required in this location, and Council resolve to support such provision of these facilities (as partially completed

for fitout), Council staff would be willing to work with the proponent to define the scope of the works during the design process. In this regard, please find attached a Draft Design Brief for a potential Community Facility within the site, noting that the brief has been prepared by Council staff and has not been endorsed by Council or made publicly available to date.

Pre-DA Meeting

Council staff wish to note that prior to the issuance of the draft SEARs, the proponent requested a 'Pre-DA' meeting with Council staff to discuss the project.

Such a request is considered a duplication of process given that Council is not the consent authority for this proposal, and that the SEARs process is designed to capture Council's feedback about the project.

Notwithstanding, Council staff met with the proponent on 30 November 2020. Comments provided by Council staff at the meeting are included under the sub-heading 'Development Assessment' in this response to the draft SEARs.

Bayside Council Technical Comments

Development Assessment –

The following matters should, as a minimum, be dealt with in the detailed site assessment for the proposal:

- Should the proposal not include a community facility, full compliance with the height and floorspace ratio controls should be met. Any amended plans are to be referred back to the State Design Review Panel for further comment and design refinement.
- The setback to Eden Street does not comply with the DCP front setback requirement of 3 metres (Part 7.7 of the DCP). It is noted that the southern building proposes a setback of approximately 1.8 metres to 3.7 metres. This should be amended to comply with the DCP.
- Whilst the Apartment Design Guide specifies a minimum deep soil requirement of 7% of the site area, consideration should be given to increasing the amount of deep soil zones where possible, particularly in the areas nominated for large canopy tree planting. A review of the plans submitted with the draft SEARs indicates opportunities for increased deep soil zones for large canopy trees at the northern boundary. Furthermore, Rockdale DCP 2011 chapter Arncliffe and Banksia identifies particular requirements for deep soil planting and landscape setbacks within the Arncliffe Town Centre Special Character Area.
- The Princes Highway frontage of the site is identified as an Active Street Frontage in the Rockdale LEP 2011. Furthermore, Rockdale DCP 2011 chapter Arncliffe and Banksia identifies particular requirements for active street frontage and retail showrooms. Given

the requirements of the Rockdale LEP 2011 and Rockdale DCP 2011, residential apartments cannot be supported at ground level on either frontage.

- Consideration of the safety and visual privacy concerns onto the outdoor space of the child care centre. The current location of the childcare is on a prominent bend of the site along Princes Highway. The proximity of the outdoor space to the neighbouring site at 181 Princes Highway may have noise impacts. Relocation of the childcare centre elsewhere on the site may be appropriate.
- Inclusion of mitigation measures to reduce impacts from potential noise and vibration from the retail uses at ground level to the residential units above.
- An acoustic report, odour report and detailed waste management report should be provided with the application.
- Property
 - Should the dedication of the Multi-Purpose Centre and Library (cold shell fitout) to Council proceed, Council may or may not be willing to take ownership of these assets. This would be subject to Council being willing to negotiate with the proponent to agree to a structured legal arrangement addressing matters such as access these facilities for the community, maintenance of the facility to an appropriate standard, and access to car parking on the site. As identified earlier in this correspondence, the matter of the Multi-Purpose Centre and Library cannot be further considered until such time as a SIS has been completed by the proponent. The SIS may identify that the community facilities are required in this location, and Council may resolve to support the dedication of these facilities (as partially completed for fitout), whether retained in private ownership for community use, or for Council ownership and community use.
- Heritage –

The subject property is within the vicinity of a number of heritage items, including:

Item name	Address	Property description	Significance	Item No.
Glenwood	27 Eden Street	Lots 1 and 2, SP 61118	Local	112
The Bard of Avon	39 Eden Street	Lot 1, DP 650148	Local	113
Arncliffe Railway Station Group	Arncliffe Railway station, Station Street and road bridge on Forest Road	Part Lot 1, DP 1033288	State	11
Street Plantings	Firth Street	-	Local	118
Arncliffe Post Office	35 Firth Street	Lot 1, DP 1000369	Local	119
St Francis Xavier Church Group	2-4 and 6, Forest Road	Lot A, DP 323842; Lot B, DP 323842; Lot A, DP 317958; Lot 1, DP 185896	Local	122

Arncliffe School	 168-170 Highway	Princes	Lot 1, DP 124274; Lot 10, DP 1066280; Lot 11, DP	100.000 P.C.C. 390.00	142
"Teluba"	 		1066280		

- Due to its scale, the development has the potential to have a wide impact. The EIS is to include a Heritage Impact Statement, which is to include a detailed view impact analysis on the identified heritage items.
- Strategic Floodplain Engineering –

The following matters should, as a minimum, be dealt with in the detailed site assessment for the proposal:

- Part of the development site is affected by PMF flooding with a flood depth in the PMF event of approximately 200mm.
- Basement driveways shall be designed with a crest in the driveway to prevent street runoff from entering the driveway access.
- A Flood Risk Management Plan up to the PMF flood level is to be prepared for the proposed child care centre.
- Urban Design –

Consideration is to be given to the following comments in the preparation of the SEARs:

A strategy for the development of the Eden Street precinct is documented in Rockdale DCP, Part 7 Special Precincts. Figure 7.7.19 shows indicative built form within the Eden Street precinct. The built form diagrams depict a park that links Eden Street with the Princes Highway. The park provides:

- clear pedestrian links between Eden Street and Princes Highway
- a generous level lawn area, that will provide a flexible space for outdoor activities, overlooked by perimeter steps
- new tree planting at the parks interface with Princes Highway to supplement existing established trees, providing a significant grove of trees between the highway and park.

The current proposal provides some positive developments to the strategy outlined in Council's DCP. The splayed shape of the park, generous northern forecourt (meeting place) and rationalised pedestrian strategy all contribute a park that is better connected to the train station and more sheltered from the harsh environment of Princes Highway. However, further consideration of the following issues are recommended:

- The functionality of the central green space is questioned. The DCP envisaged a relatively
 flat central green space with steps around a portion of the perimeter. This space would
 facilitate a range of activities including ball games.
- The grove of trees (as proposed in Councils DCP) provided an interface with Princes Highway that allowed the park to be read more clearly from the highway and created a barrier between the park and harsh environment of the highway. Provision should be made to increase the density of trees at the parks interface with the highway. Existing established trees in this area should be maintained. Increased opportunity for deep soil planting should be created in this area.
- Very minimal setbacks have been proposed between the basement and site boundaries. This leaves little scope to maintain existing trees or accommodate new street trees of scale, and adequate boundary plantings. The photo below shows an existing tree in the north western corner of the site within the proposed basement vehicular entry. The driveway should be adjusted to allow existing mature trees to be maintained.



Existing trees should be maintained in all locations where they are providing a positive contribution to the streetscape or improved interface with neighbouring properties. To achieve this, basement setbacks should be developed in response to a detailed review of existing trees.

- A street setback ranging between 1.5m and 3.7m has been proposed to the tower forms addressing Eden Street. An increased setback should be provided to respond to the character of the street, provide better opportunity for large scale street trees and comply with the requirements of Councils DCP. A minimum 6m setback should be provided.
- The forecourt/ meeting place created in the northern corner of the site is acknowledged as a
 positive design development that will potentially contribute to a positive connection to the
 train station. However, its success will be greatly dependent upon the activities within the

Community Centre to activate the space. The applicant is therefore encouraged to liaise with council to provide a co-ordinated design response to this space.

- The proposed residential flat buildings have large floor plates, with some lobbies containing up to 11 units. It is noted that windows are provided to all lobbies, however the scale of the lobbies will result in internalised corridors dependent upon artificial lighting. Further development of these spaces are recommended to embrace Apartment Design Guide (ADG) design criteria 4F 1.
- The proposals natural ventilation strategy is outlined in drawing DA 4400-1. This drawing nominates a number of single sided units as being cross ventilated. When these units are excluded the proposal achieves cross ventilation to 45% of units in the first 9 storeys. This is significantly less than the 60% required by the ADG. Further detailed development/ information is required to demonstrate ADG compliance.
- City Infrastructure –

The following matters should, as a minimum, be dealt with in the detailed site assessment for the proposal:

Section 5 – Public Domain

- The Public Domain works proposed around the Eden Street Site Development are to be undertaken in accordance with Bayside Council's Arncliffe and Banksia Public Domain Plan and Technical Manual, dated July 2020.

Section 7 – Amenity

 All overhead Electrical Wires to be undergrounded as part of this Development including the replacement of Street Lanterns with LEDs compliant with Ausgrid Standards. A lighting Category of P3 is required in all local Streets while lighting on the Princes Highway and Forest Road are to satisfy a V2 Lighting Category as per the Arncliffe and Banksia Public Domain Plan and Technical Manual.

Section 8 - Transport, Traffic, Parking and Access

- Undertake Traffic Modelling to assess access into the site and the effect on local traffic particularly for vehicles accessing the site from the north. South bound traffic along the Princes Highway will need to access the site via Brodie Spark Drive and Arncliffe Street, Wolli Creek or via Forest Road and Firth Street, Arncliffe. This has potential for significant impacts on traffic in the local area, and there may be a need for an additional right turn off the Princes Highway to cater for this increased traffic demand. The traffic modelling must extend to include these areas of Wolli Creek and Arncliffe Town Centre.
- Dependent on the results of the traffic modelling, and in consultation with Transport for NSW (TfNSW), consider dedicating a splay corner of sufficient dimensions to enable the

provision of two turning lanes from Forest Road into the Princes Highway for northbound traffic.

- The developer is to construct the two lane left hand turn lanes from Forest Road into the Princes Highway as part of the development.

Section 11 – Ecologically Sustainable Development (ESD)

- Where possible, all impervious paved areas to incorporate porous paving to benefit the landscaped areas and reduce the volume of stormwater runoff from the Development.

Section 14 – Flooding

Provide evidence that there are no flooding impacts from the development on surrounding properties.

Section 16 – Stormwater and Drainage

- The stormwater system is to be designed in accordance with the former Rockdale Council Stormwater Management Technical Specification dated 5 December 2011, which will require on-site detention across the whole site to limit discharge to no more than current.
- The overflow from the Detention System to be directed via a new Pipe Network System (Pipes and Pits) in Eden Street to the existing Council network in Burrows Street. Council will not accept a gutter discharge to the Eden Street kerb.
- Development Engineering Traffic

The following matters should, as a minimum, be dealt with in the Environmental Assessment of the proposal:

- A Traffic engineer shall prepare a traffic report and shall include the following:
 - Details of site access, road signs, pedestrian safety etc.
 - Signal/warning system and passing bay requirement at vehicle intersection areas.
 - Parking & manoeuvring of vehicles. The report should address adequacy of site and parking layout for the largest vehicle to be accessing the site.
 - That the parking layout, access and visibility requirements for the proposed parking facility are certified in accordance with AS/NZS 2890.1:2004, AS2890.2:2018 & AS/NZS 2890.6:2009.
 - Construction traffic management concept plan.
- Details of the Traffic consultant and author of the report.
- Swept path analysis (using Autoturn software or similar) shall be provided (for a B85 vehicle) for all parking spaces and demonstrate the area required to manoeuvre vehicles in and out from the site and parking spaces in a forward direction. A 300mm clearance shall be provided either side of the turning path;
- Swept path analysis (using Autoturn software or similar) shall be provided for the largest service vehicle accessing the site and demonstrate the area required to manoeuvre vehicle around the site and exit in a forward direction;
- A longitudinal profile of the driveway shall be provided incorporating the driveway ramp crest level protecting the basement from flooding as per any flood advice letter. Also a longitudinal profile is to be provided for the loading dock and internal ramps demonstrating compliance with the relevant Australian Standard;
- A <u>traffic study</u> is required to be undertaken for the development by a qualified and experienced traffic engineer to assess the traffic impacts of the development. The study shall be undertaken in accordance with the RTA *Guide to Traffic Generating Developments* and shall include, but not be limited to, the following topics:
 - Existing site conditions;
 - Route assignment, traffic flows and traffic generation (existing & future);
 - Intersection performance and levels of service (existing and future);
 - Traffic safety;
 - Access requirements details shall be provided for existing access and proposed access for maximum safety of pedestrian and vehicles
 - Traffic and parking survey shall be done on peak period (not in school holidays) two to three typical days;
 - The Traffic and Parking Impact Assessment Report is to undertake a cumulative traffic impact assessment for 'all developments' in the area. By 'all developments' it means those still have DA approval pending, approved but yet to be constructed, those are under construction and fully built but not yet fully occupied.
- The site is within 800m of Arncliffe Station and hence the RTA Guide to Traffic Generating Development rates are applicable rather than the DCP rates in regard to the market housing and proposed retail/commercial component. Social housing rates shall comply with SEPP (Affordable Rental Housing) 2009.

- The traffic statement proposes using the Rockdale DCP 2011 car parking rates rather than RTA car parking rates for market housing. This is not supported – DCP car parking rates for this development will result in a significant oversupply of car parking and therefore the RTA car parking rates shall be used as a maximum. A further reduction may be supported if supported by sustainable travel alternatives.
- The bicycle parking rates as per the Rockdale DCP 2011 are too low the development shall provide bicycle parking at a rate of 1 space per 2 dwellings as a sustainability measure. Bicycle parking shall also be provided for the non-residential component at a rate of 1 space per 150m² GFA, with suitable end of trip facilities provided.
- The development is also required to provide car wash bays at a rate of 1 per 60 units. These may be combined with proposed visitor parking, however this has additional requirements in regard to minimum dimensions and drainage which shall be complied with (Rockdale Technical Specification Stormwater Management section 7.5.5).
- All parking spaces for retail, commercial, proposed community centre and other nonresidential uses shall be combined in a single parking facility separated from the residential parking facility.
- A breakdown of service vehicle facilities for the development has not been provided and shall be provided with the detailed traffic report once complete. The current proposal which includes 2 MRV and 2 HRV within the loading dock is suitable.
- The applicant shall ensure that Towers C & D have a suitable amount of service vehicle bays accessible for move in/ out trucks and waste collection etc. The existing plans only show service vehicle bays on the side of the site where Towers A & B are located, so the servicing of towers C & D appears to be insufficient. The mechanical system proposed to achieve forward entry and exit is considered is suitable.
- A loading dock management plan will be required in the detailed traffic report.
- All waste collection for the retail and residential components shall be completely internal. The
 applicant shall demonstrate through a waste management plan the feasibility for internal
 waste collection for each component of the site. The entire proposed path of the service
 waste vehicle of minimum MRV with a length of 10.5m shall be compliant with AS2890.2 in
 terms of maximum grades, 4.5m headroom clearance and swept paths.
- The applicant will be required to undertake an assessment of the intersection performance as a result of the traffic generation resulting from proposed development on the following intersections:
 - Forest Road at Eden Street
 - Eden Street at Burrows Street

- Princes Highway at Burrows Street
- The vehicular access for residential and commercial uses are both classified as Category 4 off-street parking facilities (AS2890.1). The access requirements for Category 4 facilities is as prescribed in Table 3.2 of AS2890.1:
 - Separate entry and exit driveways
 - Entry driveways shall be a minimum of 6.0m to a maximum of 8.0m in width
 - Exit driveways shall be a minimum of 6.0m to a maximum of 8.0m in width
 - Separation of the driveways shall be a minimum of 1.0m and a maximum of 3.0m.
- The applicant shall amend the plans in order to comply with the requirements as set in AS2890.1 for both access driveways.
- A queueing analysis shall be undertaken in accordance with Australian Standards for both vehicular entries.
- Oncoming passenger vehicles moving along and between the ramp and circulation aisles appear to likely have vehicular conflicts between the Basement 2 to Basement 3 ramp. It shall be demonstrated that at the top and the bottom of the ramps, that two vehicles can pass one another. These areas shall be designed for a B85 vehicle to pass a B99 vehicle. In both cases areas shall be checked using single turn swept path templates for the B99 vehicle and the B85 vehicle, generated in accordance with Appendix B, Paragraph B3.1, which include the swept path clearances specified in Paragraph B3.2. The ramp seems intentionally designed to be smaller, hence signalling might be the intent of the applicant on this basement level. If so, this shall be noted and in compliance with relevant standards.
- This development needs to provide and promote alternative forms of transport (other than
 private car vehicles) along with sustainable transport options to decrease the prevalence
 and reliance on unsustainable transport options (such as private vehicles) and this
 particular type of vehicular traffic generation from the development. To achieve this,
 Bayside Council requires the following to be addressed:
 - Reduced car parking rate provision, and
 - Provision for Electric Vehicle Charging parking spaces. This shall be a minimum of 20% of all proposed parking spaces, and
 - Nominated car share space(s) operated by a commercial car share operator, and
 - Provision of residential bicycle parking at a rate of 1 space per 2 dwellings, and

- Provision of commercial bicycle parking (at a rate of 1 space per 150m² GFA) and appropriately designed end of trip facilities to match the scale of the development and bicycle parking provision.
- Development Engineering Stormwater Management

The following matters should, as a minimum, be dealt with in the detailed site assessment for the proposal:

- A concept Stormwater Management Plan and design certification which must be prepared by an accredited professional. The following is considered to be acceptable accreditation for the purpose of the stormwater design and certification:
 - a. Professional Civil Engineer (MIEAust) (Engineers Australia)
 - b. NER or CPENG in Civil Engineering
- Onsite Detention is required as part of this development in accordance with Section 6 of the Rockdale Technical Specification Stormwater Management.
- The development requires the use of a Water Sensitive Urban Design Approach (WSUD) in the design of the drainage system. Rockdale DCP 2011 and Rockdale Technical Specification Stormwater Management section 7.5 requires the development to confirm the targets for the stormwater pollution reduction and to justify the target by an analysis using MUSIC. Rockdale DCP 2011 also outlines the stormwater reduction targets for large redevelopment are as follows:

Stormwater Pollutants	Reduction Target
Gross Pollutant	90%
Total suspended solids (TSS)	80%
Total Phosphorus (TP)	55%
Total Nitrogen (TN)	40%

Generally, WSUD involves the recognition of a need to:

- Protect and enhance natural water systems within urban developments.
- Integrate stormwater treatment into the landscape.
- Protect water quality.
- Reduce runoff and peak flows.
- Conserve water by reducing demand on potable water supplies.
- Incorporate an oil separator in accordance with Rockdale Technical Specification Stormwater Management, section 7.5.4

- Calculations showing the capacity of the internal drainage systems; overflow structures and overland flow paths/ floodway (if applicable); and location of Council's drainage easement and/ or drainage system within and adjacent to the site.
- The basement levels are required to be fully tanked due to the presence of shallow groundwater. No groundwater is permitted to enter the basement.
- The pump-out for the basement needs to comply with requirements set in Rockdale DCP 2011 Technical Specification Stormwater Management.
- Design plans and details are required including:
 - Site layout;
 - Existing site contours and final design levels;
 - Catchment area draining to each on-site infiltration and/or OSD system;
 - Finished floor levels and footprints of the proposed development/structures;
 - Location and size of the internal and external drainage systems, rainwater re-use system, on-site infiltration and/or OSD systems;
 - Levels and location of discharge points for each infiltration and/or OSD system;
 - Maximum water surface levels in each storage;
 - Overflow structures and surcharge/ overflow paths;
 - Locations and details of each discharge control unit (if any);
 - Locations and details of the pump-out system (if any);
 - Location and extent of any overland flow path/ floodway through the site (if any);
 - Location and type of pollution control devices; and
 - Cross-section details of the rainwater tanks, on-site infiltration and/ or OSD systems.
- Public Domain –

The applicant shall address the proposed upgrades to the Public Domain as presented in the Arncliffe and Banksia Public Domain Plan & Technical Manual. These proposed upgrades shall be incorporated into the detailed design plans and are required to be constructed as part of the development – with particular attention to the upgrades along Princes Highway, Eden Street

and Eden Park as mentioned in each respective section of the Manual. The applicant is responsible for carrying out the proposed works for the entire width of Princes Highway and Eden Street, as well as Eden Park. The extent of works shall include, but are not to be limited to, the below mentioned upgrades as per the Arncliffe and Banksia Public Domain Plan and Technical Manual. The extent of works shall specifically include the following:

- The full width and extent of a new bicycle lane on Eden Street from Forest Road to Burrows Street;
- Increased bicycle parking within the public domain;
- A pedestrian crossing connecting the through site link and arcade towards Arncliffe Station;
- Public domain streetscape upgrade works along the full frontage of the site including new footpath, street tree planting etc.
- Undergrounding of electric overhead wires on Princes Highway and installation of underground supplied street lighting columns.
- Sustainability –

The following matters should, as a minimum, be dealt with in the detailed site assessment for the proposal:

- Address the required sustainable transport requirements mentioned previously in this response.
- All buildings are to incorporate the provision of Solar Photovoltaic Cells on the rooftops.
- These cells shall be provided at a rate that maximises the use of available non-trafficable rooftop space.
- Maximisation of non-potable stormwater re-use for landscape irrigation/toilets and car washing.
- Zoned and sensor controlled lighting and air conditioning shall be provided as part of the development.
- Use of LEDs and other low energy flicker free lighting resources.
- Use of water saving appliances above and beyond BASIX requirements.
- Provision of ample recycling storage rooms.
- Use of blast slag, fly ash or other pozzolan admixtures in concrete to minimise cement and reduce embodied carbon.

- Extensive use of planters on the interior and exterior of the buildings, including provision of additional green walls, green roofs etc.
- Provision of separate circuiting for temporary power for minimal stair and corridor lighting.
- Geotechnical –

The applicant shall provide a Geotechnical Report which addresses (but is not limited to) the following:-

- The type and extent of substrata formations by the provision of a minimum of two
 representative bore hole logs which are to provide a full description of all material from the
 ground surface to 1.0m below the finished basement floor level and include the location and
 description of any anomalies encountered in the profile. The surface and depth of the bore
 hole logs shall be related to Australian Height Datum;
- The appropriate means of excavation/ shoring in light of the first point and proximity to adjacent property and structures. Potential vibration caused by the method of excavation and potential settlements affecting nearby footings/ foundations/buildings shall be discussed and ameliorated;
- The proposed method to temporarily and permanently support the excavation for the basement adjacent to adjoining property, structures and road reserve if nearby (full support to be provided within the subject site);
- The existing groundwater levels in relation to the basement structure, tanking and waterproofing requirement;
- Quantify temporary and permanent seepage and provide a recommendation for seepage management.
- Recommendations to allow the satisfactory implementation of the works.

The Geotechnical Report must be prepared by a suitably qualified engineer experienced in such investigations and reporting.

Landscaping –

The following matters should, as a minimum, be dealt with in the detailed site assessment for the proposal:

- The new park is proposed to be mostly on slab, resulting in a hard surfaced park. A deep soil area which will allow some significant trees is located along Eden Street frontage. Areas of the proposed park above parking will be limited to grass areas, whilst some trees are located in raised areas or built up planters.

- The landscape treatment to the Princes Highway frontage shall comply with Part 7.7 of the Rockdale DCP 2011. The front setback area to the Princes Highway is to be planted with *Eucalyptus Robusta* to the public domain setback within street garden beds and with understorey plantings. Trees are to be planted at 400 Litres. All planting at the interface with the public domain shall follow CPTED principles and shall avoid the inclusion of retaining walls. Soil levels of planters shall match existing natural ground levels within the public domain.
- Several significant trees are located within the site. An Arborist Report is to be included in the submitted documentation. The proposed design shall seek to retain any significant tree(s) where practicable.
- Deep soil zones are to comply with Objective 3E-1 of the Apartment Design Guide, by providing a minimum deep soil area of 15% of the site area on sites with an area greater than 1,500m². Deep soil area provision shall be included along Princes Highway frontage. Should any trees by considered healthy and worthy of retention along this setback, a layout which will allow the retention of these trees should be considered.
- The stormwater system should not be located within deep soil areas, to allow free area for trees. Consider integrating water sensitive urban design elements such as bio-remediation beds to open spaces, as these can be of an effective scale and contribute to the parks character.
- For Public Domain Specifications, the EIS is to consider the Arncliffe and Banksia Public Domain Plan & Technical Manual, including:
 - Undergrounding of overhead services to maximise tree canopy opportunities;
 - Princes Highway is to include a new 2.5 metre wide shared path with pavers to be Vega Black Granite pavement (PA1);
 - Retain existing large scale trees located in street reserves or setbacks, where practicable;
 - Reduce excess carriageway areas and lane widths to provide opportunities for expanded footpath zones for informal gathering, seating and outdoor dining;
 - Provide additional tree plantings to provide shade and seasonal colour, in accordance with Council guidelines;
 - Provide new rain gardens that can filter street runoff; and
 - Provide new streetscape elements including furniture and improved pedestrian lighting in accordance with Council guidelines.

We trust that the Department will carefully consider Council's input in preparing the final SEARs for this project. If you require further clarification, please do not hesitate to contact Coordinator Statutory Planning, Josh Ford on 02 9562 1634 or via email: josh.ford@bayside.nsw.gov.au

Yours sincerely

1. Amer 15, 12.20

Clare Harley Manager Strategic Planning





Source: Billbergia Eden Street Arncliffe Executive Summary

LAHC Opportunity Arncliffe

Bayside Council Draft Design Brief - Multipurpose Community Facility

Arncliffe Multipurpose Community Facilities Design Brief

Purpose of the Document

This design brief provides an overview of Bayside Council's requirements for the Billbergia design team to test and respond to as they go through the design process to provide a Multipurpose Community Facility as part of the Arncliffe LAHC development.

Needs Assessment and Facilities Investigation

Arncliffe Priority Precinct Social Infrastructure 2016

As part of planning for the Arncliffe Priority Precinct, the Arncliffe Priority Precinct Social Infrastructure 2016 study was prepared by the then Department of Planning and Environment. This identified existing and future community facility requirements, which included a library and community facilities.

Library

The study identified the existing Arncliffe library as being very constrained (262sqm) and undersized (based on the NSW State Library guide) with in theory over 1,846 sqm required by 2036 for the suburbs of Arncliffe, Turrella, Wolli Creek and Bardwell Valley.

Community Facility

The study identified an already unmet demand for community facilities in the Arncliffe/Wolli Creek area and suggested, that at a minimum, a neighbourhood level community facility was required. This would comprise of approximately 1200sqm of community space (this being in addition to the Coronation Hall Complex) to be provided as a community hub in a central location within Arncliffe. They also identified the need for a youth space.

However, since this study was completed, the Arncliffe Youth Centre has been constructed and is due to open in late 2020.

Draft Bayside Social Infrastructure Strategy

The draft Bayside Social Infrastructure Strategy has been prepared to identify existing and future demand for social infrastructure in Bayside to 2036. Arncliffe is located within Catchment 4 (Arncliffe, Wolli Creek-Bonar Precinct and Banksia) and the strategy has identified the need for a multipurpose community facility, additional/new library floor space, community meeting rooms and creative and cultural spaces.

Bayside Council therefore seeks a space capable of becoming a community hub with a library as an anchor point and a range of bookable community spaces – the Arncliffe Multipurpose Community Facility.

Arncliffe Multipurpose Community Facility - Design Objectives

The new project will meet the following community needs:

- A place where people of all ages, abilities and interests can come together for meaningful social interaction and connection
- A place that supports learning, knowledge and culture for all
- A place where people have genuine opportunities to enhance their life and work skills through access to programmes and services
- A place where people can take part in light recreation and creative activities in a safe and healthy environment
- A place that can host important local and social events in the local community.

Design Values

- Local sense of place, a place to be proud of
- Inclusive accessible, multicultural, inviting to all
- Welcoming enduring, warm, comfortable, community destination
- Engaging social interaction, stimulating, creative, integrated art
- Social a place to connect, the social centre of Arncliffe
- Integrated flexible, useful
- Transformative catalyst for Arncliffe, participative, educational
- Sustainable efficient, innovative, environmental
- Future looking forward thinking, technological, relevant
- Whole of Life value good value in construction, operation, maintenance and decommissioning
- Safe and healthy CPTED, well-being, promoting good health.

The architectural vision includes the following overarching qualities and principles:

- A building that is open, friendly and welcoming to all
- A building form that reflects Arncliffe's sense of place and diverse community informed by community consultation
- A robust architecture made from real, natural and long lasting materials
- Provides openings onto greenspace
- Spaces that have lots of opportunities to connect to greenspace and promote exterior/ interior flow and use
- Spaces that have natural light and natural ventilation and open to the outdoors
- Clever and practical design that functions well
- Enables a great customer experience

• A building that is environmentally sustainable and educates these principles through its architecture and systems.

Site Context

The diagram shows the public domain potential community facility location.



Source: Billbergia Eden Street Arncliffe Executive Summary

Facility

The key functions that the new Arncliffe Multipurpose Community Facility will provide for are:

- Library
- Spaces suitable to promote and encourage learning
- Spaces for social interaction
- Multi-functional spaces for cultural activities, events, performances and creative arts
- Opportunities for bookable spaces in a variety of sizes for the community
- Spaces suitable for community groups and services to use
- Connection to outdoor green space/s
- Accessible for after-hours use

- Shared kitchen
- Opportunities for exhibitions
- Service/ support staff facilities
- Toilets

Functional Relationships - General

The functional relationships between components is important for a well-functioning Community Facility. These will be explored and refined during the design stages of the project and are outlined below.



Figure 2. Diagram showing functional relationships - not to scale.

Retail Square/Open Space Edge – Eden Street

Key functions

- Provide main access point of arrival for facility
- Highly visible presence

Design Qualities and Considerations:

- Building facade must be welcoming, of a human scale and encourage passing foot traffic to enter facility
- Reinforce pedestrian connections to, and legibility of, the primary entry to the facility
- Secure bicycle and scooter parking, adjacent entry to facility
- Locate café adjacent to entry area

Princes Highway Street Edge

Key functions

- Provision of shelter for footpath users
- Highly visible presence/ frontage to highway

Design Qualities and Considerations:

- Explore options for secondary entrance
- Building facade must be welcoming, of a human scale and encourage passing foot traffic to enter facility if secondary entrance provided
- Where building edge is inactive consider provision of 'shop window' type exhibition spaces.

Arrival Areas

Key functions

- Arrival Areas will provide the primary entry point for the building from which visitors will be able to
 access the other components of the facility. It is anticipated that the main entry point will address the
 public open space/Town Square on Eden Street and create a permeable/ active edge. The opportunity
 to also address the Princes Highway frontage and the possibility of a secondary entry should be
 explored.
- It is critical that the Arrival Areas are legible, highly visible and welcoming to all. The design language of the entry should encourage casual foot traffic as well as facility users.
- There should be a line of sight from the main arrival area to the green space on the northern boundary.
- It is anticipated that the facade of the facility building that faces the open space on Eden Street will be visually permeable and able to be physically opened during fine weather.
- The facility building that faces the green space on the northern boundary will be visually permeable and able to be physically opened for events and fine weather.
- The Arrival Areas should visually and physically lead to the library, main community spaces and library service these with shared facilities such as the shared kitchen, parents room and toilets.

Foyer/Entry

Key functions:

- Primary entry point to facility
- Welcome area
- Community lounge (informal seating and gathering area)
- Programming, small events and exhibition opportunities
- Provision of way finding and information about the facility
- Key role in providing access to other spaces in the facility
- Library book drop off
- Drinking water fountain and bottle refill.

Adjacencies:

- Access/ circulation to shared facilities including shared kitchen, parents room, toilets, lockers and storage
- Main entry point from public open space on Eden Street
- Access to Multipurpose Community Spaces.

Design Qualities and Considerations:

- Foyer and main entry are to be legible, welcoming for all and of a human scale
- Express Arncliffe's diverse community
- Foyer to present a permeable, accessible and active edge to the exterior. Consider ways to extend this to night time hours using lighting and technology
- Foyer space and furniture to be transformable/ reconfigurable and adapt to changing displays, events and programmes
- Shelter to be provided at entry points to building
- Promote passive surveillance of Public Open Spaces at night from facility
- Rehousing of artwork in existing Arncliffe community hall
- Provision of 'heat & eat' station
- Provision of utilities (electricity, lighting, mounting/hanging) to promote ease of set up for programming, small events and exhibitions.

Library

Key functions:

- Service point for borrowing, provision of help and information services
- Informal seating area
- Quiet zone (acoustically separated) for concentrated study, research and reading
- Meeting rooms
- Programming, activities and exhibition opportunities
- Storage
- Provision of computer terminals/charging

Adjacencies:

- Public open space on Eden Street. Must be highly visible
- Arrival Areas/ Entry foyer
- Open space on northern boundary

Design Qualities and Considerations:

- This space is open to everybody and should be highly visible and welcoming
- The interior of this space can provide both exterior outlook/day lit spaces and also more introspective, enclosed areas. Comfort and warmth are important qualities for this space
- A fully accessible space supported by sufficient adaptable and accessible facilities incorporating a smooth point of entry from a continuous path of travel. Embed the principles of equitable access for all groups in the design (all ages, all cultures, all abilities)
- 2nd level is possible but consider how this can be accessed. This could work well for a completely different function eg maker spaces
- Active areas such as informal seating areas and programmable spaces should be located on the important active edges adjacent to public open spaces, including the northern open space.
- Consideration should be given to creating some spaces that are semi enclosed for activities that are noisy or could benefit from a feeling of separation or enclosure
- Consideration should be given to activity adjacencies to best complement their noise levels.
- Consideration should be given to designing spaces that can be shared temporally by different activities.
- Small multi-purpose rooms for individual / group study rooms or small meetings / JP services and the like. Include with media screens that enable remote / group sessions.
- Study spaces for individuals to sit, use their own device, read, study, work etc, access for free public WIFI, access public PCs and print services
- Multi-purpose space/s that can be closed off for programs, meetings, activities,
- Some physical library collections to align with the demographics of the area (including other languages).

- Storage space furniture and materials.
- The study and flexible spaces should outweigh the collection space.
- Book stacks should be low and on casters for flexibility of movement. Consideration should be given to
 ways that the book collection and computer terminals can be secured at times. It is anticipated that
 occasionally this space may be required for large community events of people. In this instance, part of
 this space may be able to be integrated with Multipurpose Spaces.
- Service point close to entrance

Multipurpose Community Spaces

Key functions

- Bookable spaces of varying sizes
- Programming, activities and exhibition opportunities
- Storage

Adjacencies:

- Arrival Areas/ Entry foyer
- Open space on northern boundary
- Kitchen

Design Qualities and Considerations:

- The bookable spaces to be multipurpose and suitable for a variety of uses throughout the day and week. Quality and functionality of space should not be compromised by trying to provide for too many different uses.
- A multipurpose space that should be as adaptable and flexible as possible, incorporating movable walls, modular spaces, including generous storage able to accommodate lightweight furniture, cabling to allow screens for presentations, classes
- Space for large meetings and possibly adaptable performance/cultural/exhibition space. Hanging systems to be included.
- Adaptable for smaller groups, playgroups, book club, light recreation, possibly some maker spaces
- Small business, student study meeting spaces. Consider some fixed space for this activity or would this be part of the library?
- Scope for noisier and quieter activities. Could be a second level to accommodate this (our notes: consider potential also to include splitting these functions across this site and a redeveloped site at Arncliffe branch library site)
- Aim for a tech savvy location with capacity to become a technology/innovation hub with space which could be adapted for small business support, school student study spaces.
- Provision of good audio systems throughout
- Digital noticeboards for 'what's on' and programs
- Determine how public facilities work near the site

- Spaces on the building perimeter are to be permeable and able to open large areas during fine weather or events.
- The design should encourage flow between the interior and any adjacent open spaces.
- A space for creative programmes and a maker space should form a part of this Multipurpose Space. This space will be designed for creative activities and will have robust finishes and storage cupboards
- 'Moveable' walls are to be generally avoided as a solution for spaces requiring acoustic separation.

Creative Space

Key functions:

- Making art and creative activities
- Teaching art
- Storage.

Adjacencies:

Exterior space for creative activities

Design Qualities and Considerations:

- This space should be warm and day lit with a high ceiling
- This space will cater to wet and dirty activities (weaving, carving, printing, painting) and should have a simple and robust fitout
- Large sinks and benches shall be provided
- This space shall have a concrete floor and be easily 'washed out'
- Hose provision and adequate waste
- Access to an outside space for working, deliveries and easy ventilation is highly desirable
- After hours, independent access to this space

Shared Kitchen

Key functions:

- Provision of kitchen for community use to support functions and activities at the facility
- Able to service the large bookable multipurpose spaces
- Storage

Adjacencies:

- Foyer/ entry
- Bookable spaces.

Design Qualities and Considerations:

- Well connected and central to the Arrival Areas. Consider direct access to outdoor area on northern
 edge
- Largest bookable room to be located adjacent to the kitchen
- A (lockable) servery to bookable space for events purposes.
- It must meet commercial kitchen standards and requirements and be an inviting place to be.
- Include cold storage area.

Parents Room

- A separate space where parents can tend to their children with comfort and privacy
- Comfortable seating options and facilities for heating drink and food for infants.

Toilets

- Male and female toilets and changing areas.
- Gender neutral / accessible toilets including shower
- Conveniently located but not visibly close to welcoming and dining areas.
- Locate for optimum safety and visibility of entry to toilets.

Lockers

• Provision of secure lockers for use by community members while using the facility. Consider a variety of sizes and modular so that they can be increased/decreased depending on demand.

Support Staff

- Support Staff areas and facilities should be located close to key entries to the building. This will enable prompt and efficient support of the community users and programmes in these spaces.
- It is important that staff spaces have natural light and ventilation wherever possible to promote staff well-being.
- Secure parking for staff bicycles and scooters should be considered in this location if suitable.

Staff Work Area

- A shared open plan workroom will be provided for staff use
- A small meeting room will be provided for private staff meetings. When not in use it will be available as a workspace.

Staff Lunchroom

• A lunchroom with kitchenette will be provided for staff use. It should be a pleasant space with natural light and ventilation.

Staff Toilets and Lockers

- Accessible toilets and shower will be provided for staff use only.
- Secure lockers will be provided for staff belongings
- A first aid cupboard and defibrillator will be located near the Support Staff areas. Consider how access to this will be maintained after hours when staff are not present.

Building Services

- This component contains the ancillary spaces which support the operation of the facility.
- Access to basement, waste storage area and separate lifts.
- Separate power back up facility.

Circulation

• This component includes circulation between spaces and any required vertical circulation (stairs and lifts). It will also provide for required escape routes

Sundry Areas

• Spaces for cleaners to operate from and store their materials and a room to house the IT services for the facility will be provided.

Loading/ Parking

• The parking strategy for the facility is to provide for a variety of transport modes and arrival points.

Car Parking

- Parking areas dedicated for visitors to the community facility.
- Parking areas provided will be prioritised for users such as the elderly, disabled and parents of small children. Any parking provided will be future proofed for other uses
- On site car parking provided shall take careful consideration of pedestrian movements and safety of car park users

Parking Small Forms of Transport

Safe and secure parking will be provided for mobility scooters, bicycles and scooters.

Loading and Deliveries

- A small loading bay for large items and courier deliveries will be provided for the facility from Eden Street.
- It is important that the loading bay has after hours, independent access for facility users
- The loading bay will incorporate an area for rubbish and recycling storage. Innovative waste solutions are to be considered for the facility

Community Engagement

Limited community consultation has occurred to date and will be required to determine the final

design for the proposed community facility.

- The feedback to date has identified the following themes are important:
 - Community connection
 - Creative uses
 - Learning and development

Example Sites with some interesting features

- Granville Multipurpose Community Centre
- Rhodes The Connection
- Prince Henry Centre Randwick
- Wentworth point Community Centre and Library Parramatta
- City of Sydney Green Square Library
- Strathfield Library and Innovation Hub
- Newcastle West Library