

Response to Submissions



4 Murray Rose Avenue

Commercial Development

Submitted to NSW Department of Planning and Environment
On Behalf of GPT RE Limited

June 2014 ■ 13023

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This report has been prepared by:



Claire Burdett 24/06/2014

This report has been reviewed by:



Robert Stark 24/06/2014

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1.0 Introduction

The Environmental Impact Assessment (EIS) to accompany the State Significant Development Application (SSD 13_6076) for a Mixed Commercial Retail Development at 4 Murray Rose Avenue, Sydney Olympic Park, was exhibited from 19 February 2014 to 21 March 2014. A total of 13 submissions were received from:

- Sydney Olympic Park Authority;
- Transport for NSW;
- Sydney Water; and
- 3 organisations located in the vicinity of the proposed development; and
- 8 members of the general public.

GPT RE Limited (GPT), the proponent for the project has reviewed and considered the submissions and, in accordance with clause 85A(2) of the *Environmental Planning and Assessment Regulation 2000*, has responded to the issues raised.

This report sets out GPT's response to the issues raised by the Sydney Olympic Park (Section 2), the issues raised in the organisation and public submissions (Section 3) and provides revised Mitigation Measures (Section 3). The submissions made by Transport NSW and Sydney Water included suggested wording for conditions of consent, it is considered that a response to these submissions is therefore not necessary.

This response should be read in conjunction with the EIS dated January 2014 and forms part of the State Significant Development Application (SD 13_6076).

2.0 Response to Sydney Olympic Park Authority Submission

GPT's detailed response to each of the issues raised in the submissions made on the project by the Sydney Olympic Park Authority is set out in **Table 1** below.

Table 1 – Response to Sydney Olympic Park submission

ISSUE		RESPONSE
Design		
1.	At approximately 86m the building is excessively long, and will be the longest building in the Site 60 – 'Parkview' Precinct. The entire form should be more articulated and a greater variety of materials used to reduce its perspective bulk.	The building form has been designed with a highly articulated façade treatment in response to the site, context and planning guidelines. Although the overall footprint of the building is approximately 86m, each façade is articulated to appear significantly shorter. The Murray Rose Avenue façade is broken up into three parts with a maximum uninterrupted façade length of 24m. The Dawn Fraser façade has a maximum uninterrupted façade length of between 34 and 40m, whilst the north-eastern and south-western elevations have a maximum uninterrupted façade length of approximately 20m. Furthermore, the use of projecting horizontal lintels and vertical louvre screens further enhance the articulation and depth of the building façades. SOPA and GPT RE Limited are satisfied that no further design amendment is required.
2.	The materials and finishes should be reviewed to reduce the extent of metallic finishes and minimise dark materials at ground level. The proponent will need to provide materials/ colour board showing proposed materials and colours.	The interface with the public domain (ground level) has been designed to provide an activated / open frontage with essential building services integrated into the overall façade. The majority of the façade is glazed. To reinforce the activated nature of the building base the glass type (previously light grey tint) has been amended to 'clear' glass. The Architectural Drawings (Appendix A) have been amended to reflect this. SOPA and GPT RE Limited are satisfied that no further design amendment is required.
3.	The colonnade width should be increased 4m clear between the glazing line and the inside of the columns (SOP Master Plan 2030 – are 4.3). Columns should be redesigned to not impede the pathway.	Colonnades have been designed to improve public amenity and improve the interface with building entry points and street edge activities. Murray Rose Avenue and Dawn Fraser Avenue frontages are provided with a covered pedestrian pathway of more than 4m. The Murray Rose Avenue frontage is further enhanced by the introduction of the future awnings to the public domain. The localised introduction of columns, 10m apart, provides a minimal impediment and has been designed to ensure that compliance with accessibility standards can be achieved. SOPA and GPT RE Limited are satisfied that no further design amendments are required.
4.	The double height colonnades will need to provide low louvres/secondary shading to adequately protect pedestrians and outdoor diners from the elements.	In response to SOPA comments the design has been amended to include the placement of a future awning structure(s). This approach allows flexibility and an integrated approach for inclusion when the functionality of street level uses compliments occupation of the public domain (café and restaurant fitouts). Refer to the amended Architectural Drawings (Appendix A). SOPA and GPT RE Limited are satisfied that no further design amendment is required.
5.	Sun shading and other façade articulation should not extend more than 300mm outside the building envelope (Master Plan 2030 – Part 4.6.7).	The building design, in particular the articulation of the facades is enhanced by the varying building depth. Whilst some of the elements of the façade articulation exceed 300mm it is our view that the reason for the control is to promote privacy, provide a transition between the public and private area and reinforce the street hierarchy and layout. It is considered that the building design achieves these objectives and meets the intent of Part 4.6.7 of the Masterplan without causing any adverse impact. Following further discussion, SOPA and GPT RE Limited are satisfied that no design amendment is required in this respect.

ISSUE	RESPONSE
<p>6. Service spaces (change rooms, garbage, switch room, sub-station etc.) facing the future Dawn Fraser Avenue frontage; a significant future street, are not supported. Retail uses are required on this frontage (MP 2030 Fig 4.1). Some of these service functions should be relocated to the basement. At least 50% of the Dawn Fraser Avenue frontage will need to have active retail uses.</p>	<p>The building has been designed to maximise street level activation, and to minimise and integrate services within the building footprint. This includes:</p> <ul style="list-style-type: none"> - A through site foyer activating both Dawn Fraser and Murray Rose. - An additional pedestrian entry from 'The Paddock Park'. - Retail activation to public domain spaces including 'The Ledge' and 'Paddock Park'. - Bike storage placed at street level to improve and encourage alternate means of transport to and from work. - Provide change rooms at street level with natural light to improve amenity. - Covered pedestrian access to all street and public domain building edges. - Vehicle and service access removed from major street frontages. - Where services are required they are grouped together to avoid breaking up street level activated frontages and have been designed to a high level material and finish integrated to the overall building design. <p>Furthermore the amended design:</p> <ul style="list-style-type: none"> - has removed the carpark ventilation system from the public domain; and - included a future awning that will provide flexibility for a variety of street level activities. <p>The key objectives demonstrate that a reasonable and considered approach to street level activation has been achieved. Refer to the amended Architectural Drawings (Appendix A). SOPA and GPT RE Limited are satisfied that no further design amendment is required.</p>
<p>7. Section 3.3 of the EIS describes the proposed uses as business, office and retail premises. The original Master Plan consent for Site 60 proposed a range of neighbourhood retail/ community related uses to support the longer term residential uses in the Parkview Precinct. The proponent will need detail why the concept has changed, and the strategy of how ground floor uses will support / complement the adjoining residential uses in the longer term.</p>	<p>The building has been designed to ensure that the street level uses i.e planning, servicing and façade design have flexibility to enable adaptation in response to future uses. This includes:</p> <ul style="list-style-type: none"> - Floor levels that can be adjusted to suit either small or large tenancy layouts with levels that can be raised for direct access to street edges. - Alignment with public domain spaces including 'The Ledge' and 'Paddock Park'. - Provision of a double height space to the corner of the future Parkview Drive extension and Murray Rose Avenue. - Service access to loading and garbage areas. <p>The flexibility and variety of spaces inherent in the building design compliment the current and future possibilities for street level uses. Refer to the amended Architectural Drawings (Appendix A). SOPA and GPT RE Limited are satisfied that no further design amendment is required.</p>

ISSUE	RESPONSE
<p>8. To promote a shop front character along the Murray Rose Avenue frontage, it is recommended that spacing of mullions be increased to support window display.</p>	<p>Although shop front character is not necessarily defined by spacing of mullions, consideration has been given to ensuring that maximum flexibility is provided in the base building design.</p> <p>This includes:</p> <ul style="list-style-type: none"> - Providing a specific façade design that is different to the upper building that defines the street edge. - A generous mullion spacing of 1.5m in width. - The 1.5m width will allow the future inclusion of a generous width door or by the removal of mullions bifold or panel lift doors. - Glazing to footpath level i.e. no walls/ visual or physical obstructions at low level that may impeded future adaptation or connectivity to street edges. <p>Furthermore the introduction of clear glazing, which improves the visual connectivity between street and internal uses, has been included in the amended design. (Refer to the amended Architectural Drawings at Appendix A)</p> <p>The amended design of the street level facades, ensure that the building has a shop front character with flexibility for change to suit future uses.</p>
<p>9. Commercial tenancies on Murray Rose Avenue frontage are consistent with MP 2030 (Part 5.6.4 & Table 4.2) <u>provided</u> they can easily revert to retail uses. The proponent will need to detail the planning intent/ strategy for the ground floor tenancies.</p>	<p>Further to comments provided as part of this response an additional Ground Level Plan has been provided showing the flexibility and future possible tenancy layouts for retail uses. Refer to the amended Architectural Plans at Appendix A. SOPA and GPT RE Limited are satisfied that no further design amendment is required.</p>
<p>10. The developer will need to detail the relationship between the ground floor uses and the adjoining Paddock Park and Ledge Park, as well as the surrounding public domain and adjoining sensitive land uses.</p>	<p>Further to comments provided as part of this response, an additional Ground Level Plan has been provided showing the relationship, current and future retail uses and connections. Refer to the amended Architectural Plans at Appendix A. SOPA and GPT RE Limited are satisfied that no further design amendment is required.</p>

ISSUE		RESPONSE
Infrastructure & Contributions		
1.	<p>Section 2.6 of the EIS states that “SOPA is responsible for the provision of roads and utility services i.e. electricity, gas, water, drainage and telecommunications to the site”. However under the SOP Infrastructure Contribution Framework (ICF) 2030, SOPA is only responsible for providing utility services to support the new streets provided by the Master Plan. Part 2.12 of ICF describes what infrastructure is not addressed by the ICF. This includes potable water, waste water, stormwater (except in the context of recycled water reticulation), electricity/ gas supply, communications networks.</p> <p>The same Part of the ICF also states that the developer will need to make satisfactory arrangements for the provision of utility infrastructure as part of the development approval process, and that SOPA may, at its discretion and by agreement with a developer, choose to address contributions for utility infrastructure at the same time as contributions identified under the framework through a single planning agreement. The developer should clearly reference and clarify relevant Parts of the ICF in the EIS.</p>	<p>A Voluntary Planning Agreement (VPA) has been agreed between GPT RE Limited and SOPA. The VPA includes details in relation to the provision of utility infrastructure.</p>
Stormwater		
1.	<p>The information provided is very brief and inadequate in relation to water management. It appears that water efficiency is only proposed to be achieved through use of SOPA's Water Reclamation and Management Scheme (WRAMS) recycled water network. However, the development site is outside the WRAMS catchment area, and stormwater from this site cannot be readily harvested into WRAMS. All roof water is proposed to be discharged to future Dawn Fraser Avenue, and stormwater is proposed to drain to stormwater pits. No other solution to stormwater collection and recycling (e.g. harvesting for reuse within the development) appears to have been considered in project design, and no assessment has been made of the impact of the resulting water quality/ quantity of flows on the receiving system.</p>	<p>Following further discussion with both the Hydraulics Engineer and SOPA to clarify the requirements of the SOPA Stormwater Management and Water Sensitive Urban Design Policy 2013, the proposed development can achieve the requirements of this policy with some minor redesign. It has been agreed with SOPA that this matter can be resolved via a condition of consent which seeks that a stormwater management plan consistent with the policy be submitted for its approval prior to the release of the construction certificate, thereby allowing a consent to be issued.</p>

ISSUE		RESPONSE
Stormwater		
2.	It is unclear what the intended purpose of the proposed 'WRAMS tank' located on Basement 01 Level.	SOPA are satisfied that the design of the WRAMS tank satisfies its required purpose as a peak demand buffer tank.
3.	The proponent should provide a Water Management Plan, consistent with SOPA's Stormwater Management and Water Sensitive Urban Design 2013 (SMWSUD) policy, including full justification for the proposed water management options and any modelling undertaken and assumptions made.	A Water Management Plan, prepared by J&M Group was included at Appendix I of the EIS. GPT RE Limited seek a condition of consent to submit a further detailed Water Management Plan consistent with SOPA's Stormwater Management and Water Sensitive Urban Design Policy 2013 prior to the issue of the construction certificate. This approach has been agreed to by SOPA. .
Waste Management		
1.	The proponent will need to prepare a Waste Management Plan that includes (but not limited to) progressive testing and stockpiling of the excavated material at an appropriate frequency in accordance with the EPA's Waste Classification Guidelines around the identified "hot spots" to determine the extent of the contamination and ensure that any material that does not meet the human health guidelines is appropriately classified before being removed off-site for disposal.	A condition of consent is sought requiring the submission of a Waste Management Plan, prior to the issue of the occupation certificate.
Sediment & Erosion Control Plan		
1.	Sediment and erosion control are likely to be the most significant environment risk from the proposed works. The DGRs specifically require that measures for sediment & erosion control be identified. However the EIS does not list sediment & erosion control as a key environmental risk and does not provide any management measures. The applicant should prepare a Sediment & Erosion Control Plan.	A Sediment and Erosion Control Plan was submitted with the EIS – refer drawing H5510 by J&M Group dated 29 November 2014 within Appendix I of the EIS. The Water Management Plan referred to in the response to item 3 – Stormwater, will include further details in regards to the proposed sediment and erosion control measures. The Mitigation Measures (refer to Section 4 of this report) have been amended to reflect this.

ISSUE		RESPONSE
Loading dock & car park		
1.	All vehicles using the loading dock are to enter/ exit the site in a forward direction.	Noted. The landscape plans illustrate that a turning area is proposed which will allow vehicles using the loading dock to enter/ exit the site in a forward direction.
2.	The 'Shared Zone' and 'Turning Area' has major safety issues; namely vehicle conflicts with pedestrian and cycle movement across the mouth of the vehicle ingress/egress to the basement car park and loading dock. It is recommended that the pedestrian/cycle shareway be located on the eastern perimeter to avoid conflicts with vehicle movements.	The amended design includes a dedicated pedestrian zone on the eastern part of the site (adjacent to the future No.2 Murray Rose Avenue development site). Please refer to the amended Landscape Plans at Appendix B .
3.	The location of the car park and loading dock entries are directly facing the future Residential sites to the east. These are likely to cause noise/ vibration issues for the future residents and should be reviewed as to ways to minimise the potential impacts.	The design solution for the car park and loading dock entries has been agreed with SOPA. SOPA and GPT are satisfied that no further design amendment is required.
Vehicle Parking		
1.	MP 2030's maximum vehicle parking ratio of 1 vehicle per 80sqm should be maintained. Various improvements to public transport such as the 10-min interval train service in AM/PM peaks as well as the additional bus services (450 & 533) have resulted in better public transport services to SOP in recent years. In addition, some of the back-of-house/ services that are proposed to be located on Dawn Fraser Avenue can be relocated to the basement in lieu of the excessive parking spaces; which will then enable the activation of Dawn Fraser Avenue with some retail tenancies (See Design point 6 of this letter).	SOPA and GPT RE Limited have agreed that the proposed vehicle parking ratio meets SOPA's requirements. No amendment to the parking layout is proposed. SOPA and GPT RE Limited are satisfied that no further design amendment is required.
Special Events		
1.	It is unsure why data from Luna Park was used as the basis for providing recommendation for determining acoustic treatments for the possible impacts from the amusement rides at the annual Easter Show (as opposed to data from the Easter Show itself). However, the recommended glazing and use of acoustic seals is strongly supported.	Noted. Data was not collected during the Easter Show period, as the report was prepared in November 2013.

ISSUE	RESPONSE
Public Domain	
<p>1. A Public Domain Plan, with sections and information confirming proposed materials and finished levels for external areas is to be provided in accordance with Urban Element Design Manual (UEDM) 2009, and address:</p> <ul style="list-style-type: none"> – Interim design treatment of the level change and a screen to improve outlook onto 5 Parkview Drive (Site 62A) loading dock/ car park to improve user amenity. – Ground levels along the Dawn Fraser Avenue frontage, which should match the proposed footpath levels for Dawn Fraser Avenue as designed in the SOP Street Master Plan. – The northern elevation and colonnade interface with the Murray Rose Avenue footpath, which will need to resolve level changes with a dwarf retaining wall and/or steps. Sectional information is to be provided. 	<p>Noted. The Landscaping Plans have been amended (refer to Appendix B) to include updated information as agreed between SOPA and GPT RE Limited. It is noted however that no screen is to be provided in line with Masterplan 2030 between 5 Parkview Drive and the loading dock/ car park.</p>
Landscaping & Trees	
<p>1. 'The Ledge' has trees located over podium/edge of basement with a limited amount of bench and 'bleacher' seating. The external seating should meet the SOPA Access Guidelines and provide backrest and side support. Trees must be provided with adequate 'rootable soil volume' and an automatic irrigation system.</p>	<p>The Landscaping Plans (Appendix B) have been amended to illustrate that the seating will meet the SOPA Access Guidelines and include backrest/ side supports. In addition, all trees on the podium will be provided with adequate rootable soil volume and an automatic irrigation system will be specified for all planting on the podium.</p>
<p>2. The proponent will need to provide details of the pot sizes or detailed species information is provided for proposed planting.</p>	<p>Noted. A condition of consent is sought in this regard</p>
Paddock Park	
<p>1. The new location of Pocket Park is compromised by the location of 3 exhaust air flues; this is not supported and the structures should be integrated into other parts of the building away from public areas as it will adversely impact on the amenity of this public space and the health/ amenity of workers and residents.</p>	<p>The Architectural Drawings at Appendix A, illustrate the relocation and integration of the car park ventilation system within the building fabric.</p>
<p>2. This space will be used mainly by cyclists to access the Ground Level bicycle store and for visitor bike parking – it is recommended that paving and public seating be provided in this space to offer higher level amenity for users and that the ramp locations be moved away from the 'Tenancy 2' perimeter to allow for better connection of the ground floor tenancy and Pocket Park.</p>	<p>The Architectural Drawings at Appendix A and Landscape Plans at Appendix B, illustrate that the future 'The Paddock Park' has been amended to include:</p> <ul style="list-style-type: none"> - relocation and integration of the car park ventilation system within the building. - modified landscaping including deletion of ramps and increased hard paving surfaces. - provision of doors to allow for direct access to the public domain space. <p>Furthermore, the building has been designed to allow the flexibility for the Ground Level tenancy to have direct access to 'The Paddock Park'. SOPA and GPT are satisfied that no further design amendment is required.</p>
<p>3. Pocket Park is more likely to evolve as a pocket urban space rather than a grassed area. Turf is not a suitable surface treatment as this area will be overshadowed for much of the day. The area also has extensive ramping which will need to be DDA compliant.</p> <ul style="list-style-type: none"> – Ideally this pocket space could be further activated by complimentary ground floor tenancies such as food & beverage uses, as this area will be a major pedestrian linkage point connecting pedestrian movement between QUAD 4, Brick Pit Park and P6 car park. 	<p>Refer to comments above and amended Landscape Plans at Appendix B. SOPA and GPT are satisfied that no further design amendment is required.</p>

3.0 Response to Public Submissions

The 11 submissions from local organisations and the public raised similar issues. In order to avoid duplication, the key points raised are responded to below.

Issue

Parkview Drive is not suitable for construction vehicles accessing the site. Murray Rose Avenue is more suitable.

Response

A revised Construction Management Plan (CMP) is included at **Appendix C**. This sets out the proposed provisions for construction traffic management. In summary, the primary point of access for construction vehicles will be Murray Rose Avenue and only limited deliveries will be made via Parkview Drive.

Issue

Noise impacts during construction, particularly on 5 Parkview Drive.

Response

A Noise Vibration Management Plan (NVMP) is included at Appendix 2 of the CMP at **Appendix C**. The NVMP sets specific site actions which will be undertaken to mitigate any noise impacts which arise from the construction activities. Furthermore, a further supplementary Noise and Vibration Management Plan will be supplied by an acoustic consultant prior to the final issue of the CMP.

Issue

Impacts of dust during construction.

Response

A Dust Control Management Plan (DCMP) is included at Appendix 9 of the CMP at **Appendix C**. The DCMP sets specific site actions which will be undertaken to maintain the current level of local air quality during construction activities, minimise the generation of dust on the site and mitigate any other dust impacts which arise from the construction activities.

Issue

The Construction Management Plan is a draft.

Response

The CMP included at **Appendix C** (and as previously submitted with the EIS) is a draft document, because at this time, the head contract is yet to be determined and would need to include all measures required under the conditions of consent for it to be finalised and validated by the Principal Contractor upon appointment. The finalised, validated CMP will be issued upon application for a Construction Certificate.

Issue

Location of Appendix D – Infrastructure Plan within the document list.

Response

The Infrastructure Plan is included within the Architectural Drawings package prepared by Turners and Associates. The revised Architectural Drawing package is included at **Appendix A** of this report and the Infrastructure Plan is Drawing Number EA 008 Revision C, dated 16 May 2014.

4.0 Revised Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed development are set out in Table 2 below. These measures have been derived from the assessment and consultant report within and appended to the EIS, and the issues raised in the response to submissions.

Table 2 – Revised Mitigation Measures Table

Mitigation Measures
<p>Operational Noise</p> <p>Detailed design will incorporate the glazing as specified on all facades of the building in accordance with the recommendations included in the Acoustic Report, prepared by Acoustic Logic dated 26 November 2013.</p> <p>In relation to mechanical plant, the detailed design will:</p> <ul style="list-style-type: none"> ▪ enclose all chillers within plant rooms; ▪ locate cooling towers on the western side of the plant room, as far as practicable from future residential properties; ▪ install all plant items using vibration isolation mounts to prevent structure borne noise transferring to offices below.
<p>Promotion of Sustainable Means of Transport</p> <p>GPT RE Limited will incorporate the requirement for the preparation of Workplace Travel Plans into lease documentation for future tenants.</p>
<p>Accessibility</p> <p>The detailed design will incorporate the recommendations in the Accessibility Review report, prepared by Morris Goding Accessibility Consultants dated 1 November 2013.</p>
<p>Flora and Fauna</p> <p>A site specific Green and Golden Bell Frog plan will be commissioned conjunction with SOPA and in accordance with relevant guidelines and protocols prior to the commencement of works.</p>
<p>Flooding</p> <p>A flood impact assessment will be undertaken to ensure the proposed development is suitable in terms of flood risk, prior to the commencement of works.</p>
<p>Geotechnical</p> <p>The detailed design will implement the recommendations set out within the Douglas Partners Geotechnical Investigation Report dated 26 November 2013 prior to and during construction works.</p>
<p>Construction Management</p> <p>A detailed Construction and Environmental Management Plan will be prepared by the appointed contractor prior to the commencement of works. The Plan will be prepared in accordance with the relevant applicable Australian Standards and Occupational Health and Safety requirements and will address the following matters:</p> <ul style="list-style-type: none"> ▪ site access controls, public safety, amenity and security; ▪ operating hours; ▪ noise and vibration control; ▪ material management, waste and material re-use; ▪ construction traffic management; ▪ dust suppressions; ▪ tree protection; and ▪ notification of surrounding properties.
<p>Operational Waste Management</p> <p>An operation waste management plan will be prepared by the building manager/future tenant(s) of the building prior to the issue of the occupation certificate.</p>
<p>Water Management</p> <p>A detailed Water Management Plan, consistent with SOPA's Stormwater Management and Water Sensitive Urban Design policy 2013 and including proposed sediment and erosion control measures, will be prepared prior to the issue of the construction certificate.</p>