

19 December 2014

Mr Ben Lusher
Manager – Key Sites
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Lusher,

RESPONSE TO NOTICE OF EXHIBITION – SSD 6603 Site 68 SYDNEY OLYMPIC PARK

I refer to your letter dated 14 November 2014 regarding the exhibition of the above application.

The Sydney Olympic Park Authority (SOPA / the Authority) supports the proposed development and believes that the proposal generally complies and contributes to the vision of a vibrant township as outlined in the Sydney Olympic Park Master Plan 2030.

The Authority has reviewed the submitted application and wishes to raise the following in relation to the proposed development.

Apartment Mix

The Sydney Olympic Park Master Plan 2030 (SOP MP 2030) requires a unit mix comprising a minimum 15% of units to be studio or 1 bedroom units and a minimum 15% of units to be 3+ bedrooms. The proposal only provides for 10% of the total units being 3+ bedrooms. The proposal provides no justification for this departure. It is recommended that more 3 and 4 bedroom apartments be considered, which in this area could be attractive to the market, and would contribute to greater diversity in the SOP community.

Built Form & Scale

1. Given the constraints of the site in terms of geometry, its relationship to the parkland and through-site linkages, the additional height, FSR and separated built form arrangement is generally supported. However, the increase in height and FSR is a trade-off and should not be seen as a precedent for future increases to height and scale for the childcare site and/or the whole site in general.
2. The indicative form and location of the future child care centre is strongly supported due to the high visibility of the site. Although specific details of the centre will be assessed as a separate Local Development DA, the current proposal provides for future lift and service access, drop off and car parking in the basement levels below the future building. There should also be adequate access to utilities and height clearances for structural support of the future building.

Solar Access

The proposed development provides an assessment of solar access between 9am and 4pm. The proposed development should provide an assessment between 9am and 3pm (as per MP 2030) and provide justification if the 70% target is not achieved.

Storage

The SOP MP and the RFDC both identify specific and identical storage requirements for residential units. Note: There is an anomaly in the MP, which refers to the storage requirement as m² as when it should be m³.

It appears that some of the proposed storage for certain types of Units falls significantly short of the required storage space and no specific details are given in relation to the amount of basement storage to be provided for each unit type (pg. 62 Appendix C).

Bicycle Parking

The SOP MP requires 1-2 bicycle space per unit depending on Unit type (in addition to visitor). The EIS indicates that 580 spaces are provided, but the plans appear to provide 156 spaces only. Bicycle parking should be at Basement level 2 as this is the only level on-grade with the street entry.

Pedestrian / Cycling Access

1. Cycling through the rail tunnel underpass is not supported due to potential conflict with pedestrians. In this regard paving materials, directional signage and ground stencilling should be used to direct cyclists to the existing asphalt concrete share way on the Australia Avenue pathway.
2. Secondary cycle route from Bicentennial Park to the Town Centre to link with Parkview new street (Road 4).
3. Primary pedestrian route shown as '5m shareway': paving material to be clearly differentiated from primary cycle route (AC10).
4. Paving for the upgraded connection with new pedestrian/cycle bridge is to maintain AC10 surfacing (paving type 1) with appropriate directional signage as required in the Sydney Olympic Park Urban Elements Design Manual.
5. Management of vehicle traffic for Childcare Centre and Residential Lobby drop-off needs delineation of paving and bollard elements to reduce vehicle/pedestrian conflicts.

Landscape / Public Domain Plan

Given the prominence of the site at a significant entry point to the Sydney Olympic Park town centre and the complexity of level changes and circulation around the site, the quality, presentation and maintenance of external areas and public domain is a critical consideration.

The proposed landscape requires further refinement to improve spatial cohesion, site lines through the site and provide a more legible public address to the child care centre and apartment building. The following issues should also be addressed:

1. The proposed 'Phoenix Palms', are at risk from 'Fusarium' infection (root pathogen), and provide roosting sites for the Australian White Ibis which are considered a pest avi-fauna species. Only healthy trees should be relocated to the child care frontage. Alternatively, a more suitable tree /palm species could be nominated.
2. Larger scale alternative species of shade trees should be considered in place of Chinese tallow tree (*Sapium sebiferum*), which is out of scale with residential tower.
3. Legend does not show 'Existing trees for protection' or Existing trees for removal'
4. Street trees shown in Parkview New Street (Road 3) should be noted as 'future proposed trees by others'.
5. Legend is to include existing and proposed public area lighting. New lighting is to meet relevant Australian Standards and UEDM lighting category (P/V) standards.
6. The following are to be confirmed for the Water Feature / Cascade Pond:
 - a) Species for all bio-retention areas and irrigation systems.
 - b) Compatibility of stepping stones pedestrian access and seating niche with wetland plantings.
 - c) Linings and materials of cascade ponds and bridge.
 - d) Location of pumps, filters and control room/chamber.

Crime Prevention through Environmental Design

There is little passive surveillance to the ground level of the proposed development and this is considered an issue. It is not clear from the documentation provided whether the proposed planting consists of low ground covers with tree planting. The location of tree planting should

ensure that clear and unobstructed sight lines are retained for passive surveillance of the ground floors of the new building, as well as ensuring any new planting discourages antisocial behaviour.

Substations

Proposed substation on corner of Bennelong Parkway and new street (Road 3) is in conflict with the corner gabion wall in SOPA civil package – Parkview New Streets.

Mechanical Ventilation

Provide elevation details of the Exhaust Vents / Plenum / Intake Vents and confirm vent materials.

Ecology

1. The Flora & Fauna assessments (FFA) shall consider off-site impacts of the development to flora and fauna, including shadowing of the tower over the habitats of Lake Belvedere and surrounding public parkland areas, and impacts of changes in stormwater flows to flora and fauna in Bennelong Pond.
2. The FFA only provides recommendations for further ecological surveys and habitat improvement works (on land outside the development site which have not been discussed or agreed with SOPA). The FFA shall be amended to include specific management measures, that are discuss and agreed with by SOPA.
3. The Biodiversity Offset Strategy (BOS) does not state which of the 4 options proposed is to be implemented to offset impacts of the development. Two of the options state that they require agreement with SOPA. The proponent is to consult these options with SOPA.
4. The BOS states that the offset required can be reduced because new bio-retention ponds will be Green and Golden Bell Frog habitat. The suitability of these sites as frog habitat should be considered as the development site will become a highly urbanised site. Should the development site be used to reduce the offset required, an appropriate management plan should be developed and implemented by the Proponent.

Stormwater Management

1. The stormwater system is to be designed so that the discharge flow rates into Bennelong Pond meets SOPA requirements.
2. The Applicant is to revise the Stormwater & Flooding Assessment Report including the Integrated Water Management Plan (Appendix Q) to address all aspects of SOPAs Stormwater Management and Water Sensitive Urban Design (SMWSUD) Policy.
3. The Applicant be required to revise the Stormwater & Flooding Assessment Report (Appendix Q) to address the longer term ecological impacts on Bennelong Pond arising from the increased water quantity outflows from Site 68 during larger storm events (refer Table 5) and ways to manage or mitigate these impacts e.g. the high flow bypass.
4. The Applicant provide a maintenance and performance testing regime for the new treatment system prior to approval of the DA (consistent with the SOPA SMWSUD Policy).
5. DA consent conditions should address recommendations stemming from these reviews.

Contamination and Geotechnical Reports

The contamination report prepared by Douglas Partners identifies fill material including some asbestos and hydrocarbon contamination within the site and notes the potential for contaminated groundwater to be present that may impact on the proposed building. The proponent should be required to implement the recommendations of the Contamination Report. The following conditions are recommended for any consent granted:

1. Prior to commencement of construction, the proponent must:
 - a. Undertake the additional assessment and classification works outlined in the report prepared by Douglas Partners titled "*Report on Preliminary Site Investigation (Contamination) – Project No. 73942*" and dated September 2014 including:

- further assess the contamination in the existing fill and soil that will remain on the site for areas outside the proposed basement excavation;
 - assess the groundwater quality on the site;
 - engage a suitably qualified expert to prepare a report outlining results of the soil and groundwater assessments and providing recommendations, if required, on any control and disposal options and / or mitigation measures that may be required to be incorporated into the building as a result of soil or groundwater contamination;
 - submit a copy of the report to the Department of Planning and Infrastructure for approval and
 - provide a copy of the report to the Sydney Olympic Park Authority for information.
- b. Prepare a detailed Waste Management Plan for construction works including but not limited to segregation and management of contaminated materials and spoil stockpiles for the approval of SOPA's General Manager – Operations & Sustainability.
2. During construction, the proponent must undertake waste classification of all material to be transported off site for disposal in accordance with the Department of Environment, Climate Change and Water (2009) *Waste Classification Guidelines*. The proponent must:
 - a. dispose of all wastes to a facility that can lawfully receive that waste; and
 - b. keep all documentation including waste classification reports, receipts and weighbridge dockets for materials disposed off site and provide these to SOPA or the regulatory authority if requested.

Accessibility & Building Code of Australia

1. Any construction plans are to demonstrate compliance of the provisions for persons with a disability with the requirements of AS 1428.1 *SOPA's Access Guidelines 2011* and the recommendations contained in the Access Review by Morris Goding dated the 19th September 2014. An Access Impact Statement is to be prepared by an appropriately qualified person to demonstrate how the proposed development will integrate into the town centre with compliant paths of travel and services.
2. All non-deemed to satisfy compliance issues as identified in the BCA Assessment Report prepared by McKenzie Group dated the 19th September 2014 are to be captured into the Construction Certificate process as alternative solutions to the current Building Code of Australia (BCA) provisions.

Should you require any further information on the above please contact me on 9714 7139.



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A/Manager, Planning