

25 November 2015

Amy Watson
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Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Email: brendon.roberts@planning.nsw.gov.au

RE: SSD 15_7033 – Site 53 | 2 Figtree Drive, Sydney Olympic Park

Dear Brendon,

I refer to the Environmental Impact Assessment for the above SSD Application, which was referred to Sydney Olympic Park Authority (the Authority/SOPA) for comment on 15 October 2015. The following comments are based on the information provided. Some concerns may be resolved through further information being provided by the applicant.

1. DESIGN COMMENTS GENERALLY

a. Building height

It is noted that the maximum building heights have gradually increased from 10 to 16 stories through the design development process. The Authority's Design Review Panel (DRP) has generally supported these changes but was concerned that the building articulation shown in earlier sketches has somehow disappeared and that the tallest block now appears quite monolithic. Some of the original design features such as the castellated parapet at the top of the building (which helped to reduce the visual impact of the extra height) has now been infilled. The EIS has not responded to this issue and it is recommended that the original design of the parapet be reinstated as requested by the DRP.

b. Face brickwork

The use of face brickwork in this project is strongly supported. It will help to add warmth and texture to the urban character of Sydney Olympic Park. One concern is that earlier sketches showed the feature corner with a strongly expressed window pattern which has disappeared from the DA scheme and been replaced with full width balconies on the most visible (SE facing) frontage. It is recommended that the facebrick character of the SE frontage be reinstated to match the lower levels (1 to 3) of this tower element.

c. Linear Park frontages

Although the DRP has generally supported the relocation of units away from the podium facing the linear park to the south, there is a strong concern that the absence of active uses directly overlooking the park will affect security in the park. It is recommended that the podium be reviewed to include more active uses overlooking the park – this could include supermarket frontages and communal areas.

d. Off street building entries:

The generally internalised layout of the site, and the location of building entries away from street frontages are ongoing concerns. The SOP Master Plan 2030 requires that 'building entry points are within clear site of a public street frontage' (part 4.6.12) to maximise safety and security and promote active street frontages. SEPP 65 principle 7 (Safety) also promotes maximising 'activity on streets' and 'overlooking of public spaces'. The proposal is for a single major entry off Figtree and a secondary entrance off the new street, with all building access from within the private open space. Very few ground level apartments have direct access off the 3 surrounding public streets.

The EIS rationale is that more direct entries off the streets would not be accessible. However, it is recommended that both entrance options should be provided - even stair access from the footpath up to residential lobbies would greatly benefit the safety and amenity of the streets. It would most certainly improve security within the communal area.

e. Development Boundary - Australia Avenue frontage

The building footprint does not extend to the master plan boundary on Australia Avenue, resulting in a heavily landscaped setback that gives a very suburban feel to this major frontage at the entry to the town centre. It is recommended that the ground level retail area be extended to the street boundary as shown in attached marked up sketches (SK01 and SK02). The use of brickwork for this frontage is supported.

2. PUBLIC DOMAIN INTERFACE

a. Fig Tree forecourt

The new forecourt around the fig trees at the NE corner of the site is not very public, with only 2 points of entry from adjacent footpaths, indirect pathways and all enclosed by palisade fencing. The key concern is that this area, being a forecourt for the supermarket, should be more visible, more urban and more connected with its approach points.

It is recommended that the path and stair network be reviewed to allow for wider paths and stairs, more direct alignments and with more connections to adjacent paths. The enclosing fence should be removed.

Opportunities for outdoor dining should be considered – the decking under fig tree could be suitable for this provided there is no damage to the root system.

b. Protection of Fig Trees to be retained

Civil Siteworks Plan BG&E C-0100B indicates extent of basement excavation in close proximity to root plates and canopy of existing figs. It is recommended that the Arborist Report should nominate the extent of fenced enclosure for 'Tree Protection Zone' during construction works.

c. Electrical Substations

The proposed freestanding electrical substations on Figtree Drive are not supported as they are unsightly, highly visible from the public domain and unsuited to Authority's vision for a high quality residential frontage for this street. It is recommended that the substations be incorporated into the overall building envelope, in a location that provides suitable street

access. This is now general practice for new development at Sydney Olympic Park (refer recently completed Lion Nathan Building at Murray Rose Avenue).

d. Landscaped setbacks

Typical Sections A-A, B-B, J-J etc. (360 degrees Landscape Architects) show soft landscape interface in the 'body corporate landscape zones' adjacent to SOPA streetscape/public footpaths. It is recommended that planted embankments on 'body corporate land' adjoining public footpaths are no steeper than 1:3 to reduce risk of vegetative matter, mulch and soil spilling onto paths and creating slip/skid risks.

e. Entry steps from Linear Park

The proposed stairs linking the private communal open area to the linear park extend beyond the property boundary and take up more than half the width of the park. Given that public access will not be permitted through the private communal open space, the new stair should be located within the property boundary.

3. COMMUNAL OPEN SPACE

a. Rootable soil volumes

All landscape areas shown over structural deck/podiums are to provide rootable soil volumes to support long term vigorous growth of trees and other plantings as shown in App G of the EIS. It is recommended that the DESIGN COMPLIANCE Drawing (360 degrees Landscape Architects) confirm compliance with minimum 2m depth/width of rootable soil area.

b. Communal Play Spaces

Social gathering areas, outdoor table tennis and play spaces are supported; however the ongoing management and safety compliance of play equipment and safety surfacing, including initial certification and ongoing inspection, will be the responsibility of the developer and body corporate.

4. GENERAL ENVIRONMENTAL MATTERS

a. Odour Assessment Report

The report concludes that odour is not a significant issue for the development site. The odour assessment report is well considered, taking into account the improvements to the Lidcombe Liquid Waste Treatment Plant, the report on odour for Carter St and the EPA's odour assessment criteria.

b. The Environmental Site Assessment & Hazardous Materials

In-principle, the Authority has no issues with the general approach or conclusions drawn subject to the proponent undertaking further chemical testing for offsite disposal of any excess spoil. It is recommended that the proponent undertake further chemical testing for offsite disposal of any excess spoil.

c. Geotechnical investigation

The EIS indicates that while the groundwater table is expected to be below the excavation, some groundwater seepage into the excavation may occur, requiring pump out of

groundwater around piles. It is recommended that details as to how this will be managed should be addressed in the Construction Environmental Management Plan for the site. SOPA as the landowner requires that the proponent must comply with all requirements of the POEO Act and the Department of Water (if required).

5. STORMWATER

The application materials have been reviewed against SOPA's Stormwater Management / WSUD Policies. Inconsistencies with SOPA Policy and deficiencies in provided information have been identified. These include:

a. Stormwater Quantity Management

The proposed on-site detention (OSD) tank appears under sized. SOPA's preliminary modelling indicates that the tank should be approximately 100 cum rather than the 51 cum proposed. It is recommended that the 'DRAINS' modelling be reviewed and more detailed information be provided to support conclusions, especially if the 100 cum tank is considered unnecessary.

The proposal to further reduce the volume of the OSD tank to 26 cum by offsetting the volume of the rainwater reuse tank is inconsistent with SOPA policy and not supported.

b. Stormwater Quality Management

SOPA has concerns with the use of the proposed proprietary devices e.g. Envirpods & Stormfilter to meet the stormwater quality guidelines due to:

- the high levels of maintenance required
- reliance on body corporates to undertake maintenance,
- lack of general visibility of these systems
- the inability to apply industry standards for modelling and verification of systems and
- reliance on manufacturer's claims about the performance of these systems

SOPA preference is for the use of natural landscape based treatment systems. There is an extensive area of deep soil along the southern boundary of the site which is well suited to a vegetated treatment system. It is recommended that an above ground landscape treatment system be considered in lieu of the proposed proprietary stormwater treatment devices, to be located in the basements.

There is also insufficient detail to assess the proposed Stormwater Management Strategy. As the 'MUSIC' modelling provided has used non-standard treatment nodes to model the proprietary devices it is not possible to assess the Strategy. Furthermore there is very little information provided on the configuration of the model parameters for each component. Additional information is to be provided.

6. RAINWATER RE-USE STRATEGY

a) There are inconsistencies in the application relating to **rainwater re-use**:

- The strategy (App V) proposes to harvest from the majority of roof areas (approximately 4,000 sqm) into a 100 kL rainwater reuse tank to be used for irrigation whereas the ESD/BASIX report (App H) describes a 10 kL rainwater tank

harvesting from only 500 sqm of roof. This inconsistency is to be clarified and the re-use tank size confirmed.

- The drainage design refers to the hydraulic engineers design for the rainwater tank but there is no detail in App V2 on this (it is noted that hydraulic engineering drawings are not provided). The rainwater tank and its configurations should be shown on the drawings.
- b) Harvested rainwater is proposed to be used for **irrigation only**. This is inconsistent with SOPA policy which requires that locally harvested rainwater should be the primary source of non-potable water – at least 90%. The reason given for not using the rainwater (Sydney Water’s metering policy) is not considered sufficient and it is recommended that this issue be investigated further and through further discussions with SOPA and WRAMS operators.
- c) The rainwater reuse strategy includes a number of **technical errors** as follows:
- The irrigation demand has been significantly overstated. The total demand is not consistent with benchmarks for typical passive open space. The estimated water use is higher (in terms of kL per sqm) than what would be applied to SOPA’s high quality sports fields
 - The irrigation demand should be seasonal as irrigation is high in summer and low in winter. Currently the same daily demand has been used all year round.

7. EROSION AND SEDIMENT CONTROL PLAN

a. Need for Sediment Basin

The EIS includes an erosion and sediment control (ESC) plan in the Civil Drawings (App W) and further information in Construction Management Plan (App Z). SOPA is concerned that the ESC plan proposal for pit inlet and sediment fences as the main strategy is insufficient to meet its standards. SOPA Policy and the ‘Blue Book’ is that “calculations as to the need for a sediment basin” be undertaken for sites greater than 2,500 sqm. Calculations have not been provided to demonstrate that a basin is not required at this site. This is particularly important given the context of the downstream receiving waters (containing threatened species sensitive to sediment deposition) and the potential impacts of sediment on this system.

b. Omissions and consistency of documents

The ESC plan is inconsistent with the Construction Management Plan and needs to be updated to include all the elements in line with the Blue Book, including:

- a temporary holding area for sediment should be shown on the ESC Plan.
- Sediment holding tanks, proposed for basement excavation dewatering, are not shown on the ESC Plan. There are no details provided for the tanks, including sizes and configurations, or information on flocculants to be used. Given that the fill and clay on site are clay (based on bore logs in the geotechnical report) it is likely that flocculants will be required. We note that alum is not recommended as a flocculant.
- A wheel wash system is proposed but there are no details on the ESC plan.

It is recommended that the additional information be provided prior to final assessment of the Site 53 Stormwater Management Strategy and Design Documentation.

SOPA would like to have the opportunity to further review the amended application and/or any Draft Conditions.

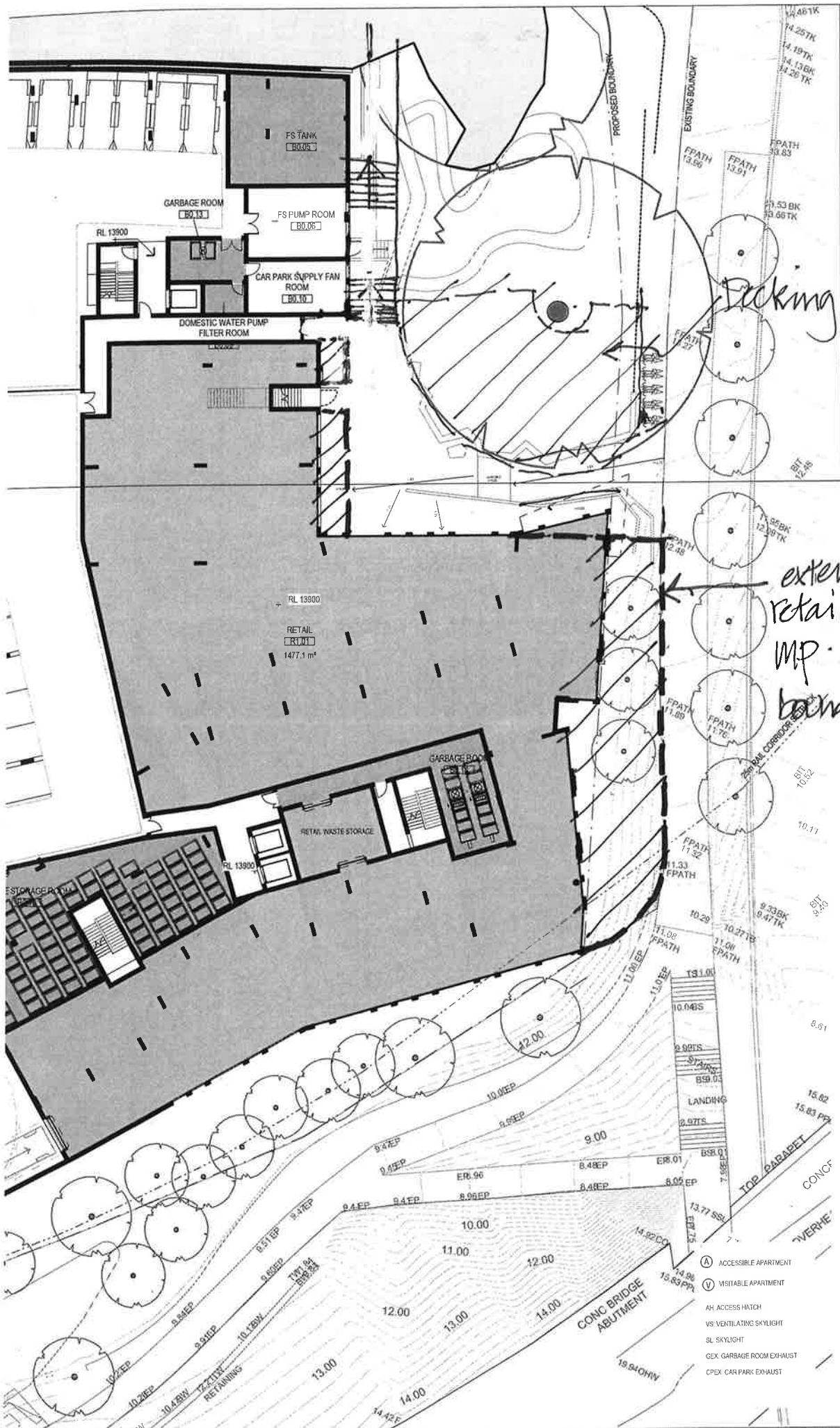
Subject to the above issues being satisfactorily addressed by the proponent, the Authority supports the proposed development and believes that it will contribute to creating a vibrant township outlined in the Sydney Olympic Park Master Plan (MP) 2030.

Please contact me on 9714 7934 (email Darlene.vanderBreggen@sopa.nsw.gov.au) or Dat Tran on 9714 7139 (email Dat.Tran@sopa.nsw.gov.au) should you require any further assistance or clarifications in relation to this submission.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Darlene van der Breggen', with a small dot to its right.

Darlene van der Breggen
Executive Manager, Development Planning



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ISSUE	DATE	FOR
A	22/06/2015	Coordination Issue
B	24/06/2015	Coordination Issue
C	16/07/2015	Coordination Issue
D	07/08/2015	Issued for DA

CONSULTANT	URBIS
TEL 02 8233 7621	
CONSULTANT	BC&E
TEL 02 9770 3300	
CONSULTANT	STEELEN VARMING
TEL 02 9967 2200	
PROJECT MANAGER	MIRVAC DESIGN
TEL 02 9060 8000	
CLIENT	

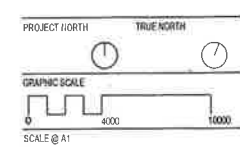


MIRVAC PROJECTS PTY LTD
CLIENT NUMBER

TEL 02 9080 8000
PROJECT

2 FIG TREE DRIVE
SYDNEY OLYMPIC PARK
BVM PROJECT NUMBER

S1502006
DRAWING KEY



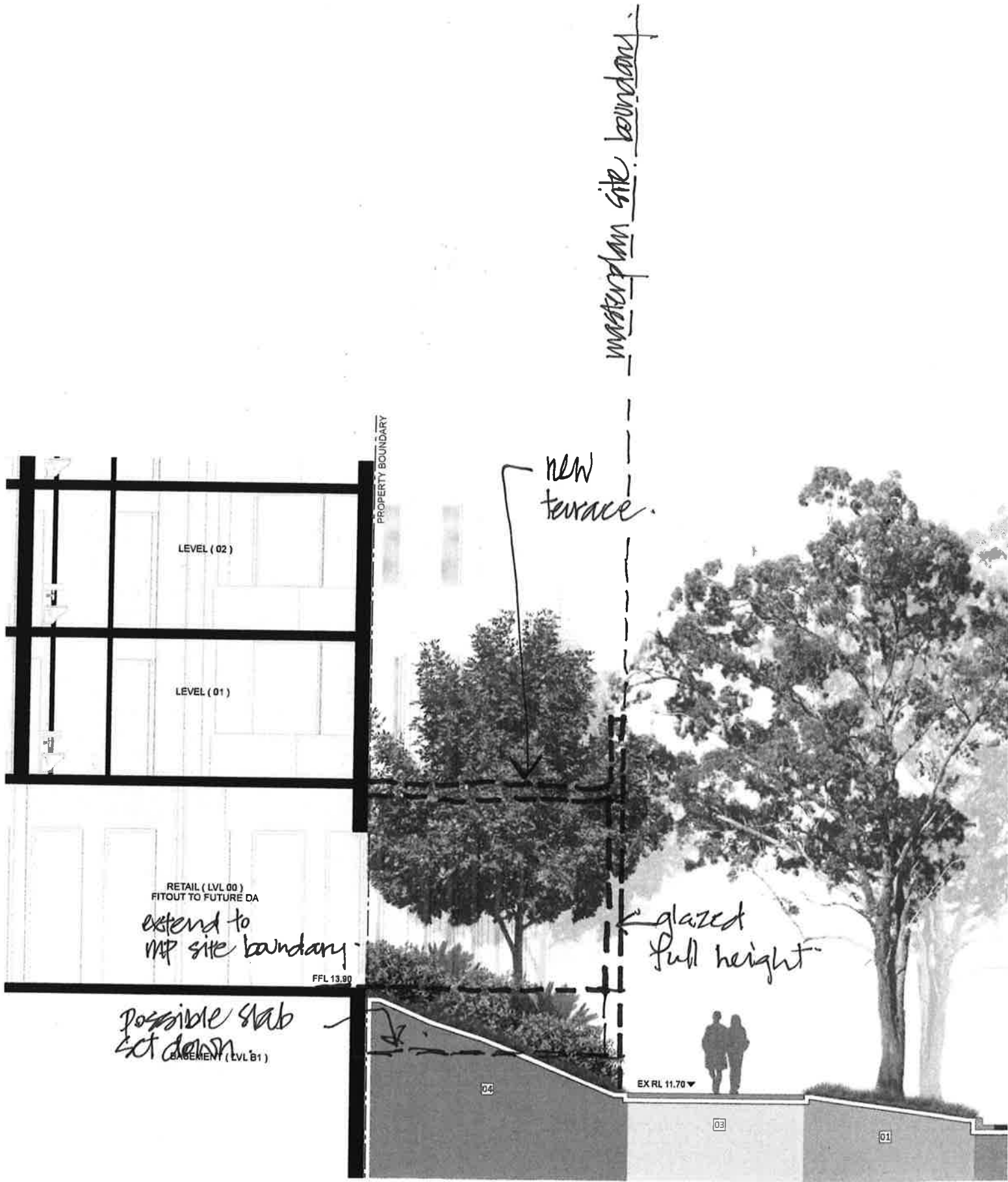
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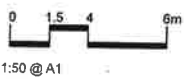
GENERAL ARRANGEMENT
PLAN LEVEL 00

DA-2103 ISSUE D

SKOL - SOPA markup



ING EAST (AUSTRALIA AVENUE)



ISS.	AMENDMENT	DATE	BY
A	DRAFT Development Application	10.06.15	KR
B	DRAFT Development Application	05.08.15	LB
C	Development Application	07.08.15	LB/KR

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IMPORTANT NOTES:

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3. The architect is not responsible for any errors or omissions in this drawing.

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7. The architect is not responsible for any changes to the design or scope of the project.

8. The architect is not responsible for any disputes or claims arising from this project.

9. The architect is not responsible for any legal proceedings or actions taken against the client or the architect.

10. The architect is not responsible for any other matters relating to this project.

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