

29 March 2019

Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001



Attention: Lawren Drummond

RE: Response to Department of Planning and Environment Request for Response to Submissions (SSD 8019 MOD 1) at 21 Honeysuckle Drive, Newcastle 2300

Our Ref: 18307

This letter has been prepared in response to the correspondence from the Department of Planning and Environment (the Department) dated 4 March 2018 requesting a response be provided to submissions received during the exhibition period of the Environmental Impact Statement (EIS) for State Significant Development application SSD 8019 MOD 1.

Comments have been provided by Council and Other Government Departments. These have been addressed in separate responses which are attached to this document as Attachment A. Submissions were received from a number of public residents and these have also been responded to and are attached to this document in Attachment B.

Outlined below are the points raised by the Department and the proponent's response thereafter:

1 View Impacts

Request

- Provide a consideration of view impacts as a result of the increased rooftop plant height and added second plant structure on the rooftops of Buildings A, B and C. Please explain why the additional plant box on each roof is required and explore whether an alternative configuration could be provided that would mitigate view impacts. Please specifically consider the above in relation to Building C and the view impacts on apartments behind at 10 Worth Place.*

Response

A view analysis has been prepared for the site that compares the view impacts between the approved plans and the proposed modification plans. This can be found in Attachment C.

The reason the condenser units have been relocated is because it was identified that their location was working out to be extremely difficult to maintain and service via the condenser pipes while the units were isolated on a single side of the building. After thorough investigation during the design and development phase it was concluded that a split of the condensers over each half of each building would be more appropriate.

The reasoning for the height increase is due to the change in construction methodology for the roof. The amended plant height allows for better water proofing and better protection for the development. The condenser platforms have been raised to disassociate from the slab and allow the roof sheeting to run underneath the condenser units providing coverage for the area below.

As can be seen in the view analysis, and figure 1 below, the proposed increase in height will have a negligible impact in terms of the impact of views from the properties at 10 Worth Place.

Figure 1 – View impact approved vs proposed.



2 Anti-Graffiti

Request

- *Provide rationale as to why the Applicant proposes to remove part of the Anti-Graffiti Condition F5 – i.e. 'any graffiti evident on the exterior facades and visible from a public place is to be removed within 48 hours'.*

The Department notes the condition is a standard requirement for other buildings in the area (e.g. SSD 8440 at 42 Honeysuckle Drive) and considers the condition to be reasonable.

Response

The intention of the removal of Condition F5 was not to allow for the graffiti to be left on the building, but simply to remove the requirement of the surfaces to be treated with an anti-graffiti coating. The justification provided in the original application noted:

"The materials that have been chosen to be used on the walls and surfaces around ground level consist of glass and tile finishes that already exhibit anti-graffiti properties and consequently no additional treatment by the application of anti-graffiti coatings is necessary."

DOMA have no intentions of leaving graffiti on the building considering the expenses and quality of the materials being used. The cost to treat materials with anti-graffiti coating when they already exhibit anti-graffiti properties is unnecessary. It is likely that the removal of graffiti will be included in the strata management plan for the site.

Alternatively, the condition could be amended as follows:

ANTI-GRAFFITI

- F5 ~~All ground level walls and surfaces are to be treated with an anti-graffiti coating where possible. In addition,~~ any graffiti evident on the exterior facades and visible from a public place is to be removed within 48 hours.

3 Flood Management

Request

- The Hunter and Central Coast Development Corporation (HCCDC) has advised the Department that there has been an updated flood report for the area that recommends the PMF for the site to be 3.5m (not 3.4m as proposed). Please consider the updated flood study and amended the PMF level accordingly.*
- We note that as per the Modification Application, the proposed modified condition B23 doesn't include any change to the following sentence:
'Openings such as exhaust ducts, car park air intake, vents and the like that could potentially allow for flood waters to enter the basement (except for carpark and access) are to be designed at minimum RL 3.65m AHO'*

Please confirm that no change to the 3.65m level is proposed here.

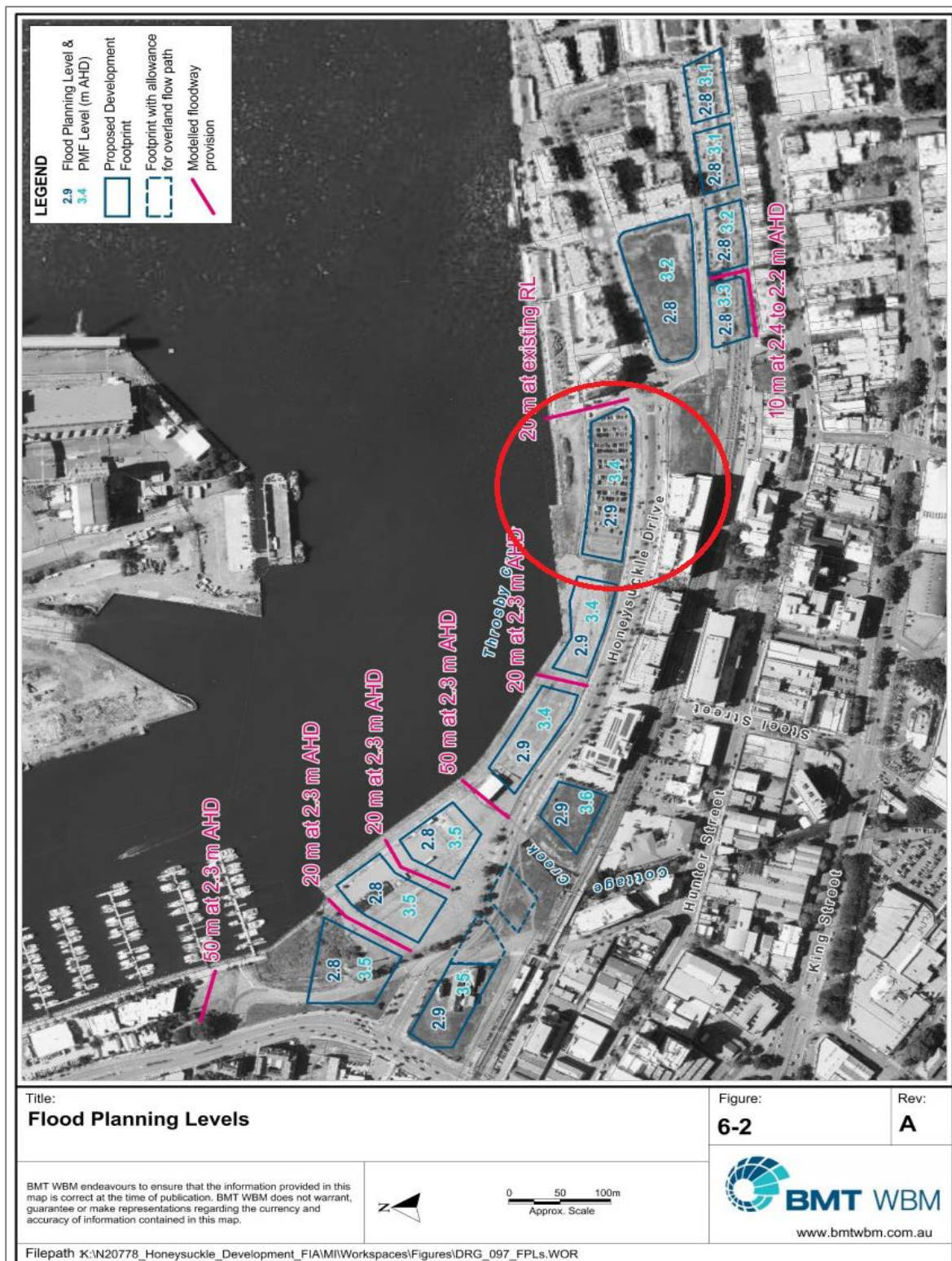
Response

- The PMF level has been taken from the Honeysuckle Redevelopment Area Flood Study – March 2018 (current document on Newcastle Councils website), which nominates 3.40m as the PMF level. This level has also been reflected in the Flood Emergency Response plan. An extract from the flood report showing the PMF levels is below in Figure 2.
- Point 3 of Councils Flood Management DCP 4.01.3 – Management of risk to property reads as follows:

3. *Basement garages may be acceptable where all potential water entry points are at or above the probable maximum flood (PMF), excepting that vehicular entry points can be at the FPL. In these cases, explicit points of refuge are accessible from the carpark in accordance with the provisions for risk to life set out below.*

This level is typically taken as the PMF which should be 3.40m and not 3.65m, as per the updated flood report PMF level, which is shown in Figure 2 below.

Figure 2 – Extract from updated flood report showing PMF levels.



4 Conclusion

KDC trusts that this response to the submissions suitably addresses the concerns outlined by the Department's request for further information. If you have any questions regarding this letter please do not hesitate to contact Samuel Newman on (02) 4940 0442.

Yours sincerely



Samuel Newman
Town Planner
KDC Pty Ltd

Attachment A – Response to Council Submission

Attachment B – Response to Public Submissions

Attachment C – View Analysis