

2014SYE002 – 28-38 Flora Street, Sutherland

DA13/1192

## REPORT APPENDICES

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Evan Phillips - 9710 0569  
File Ref: PAD13/0078

23 October 2013



Fabcot Pty Ltd  
1 Woolworths Way  
BELLA VISTA NSW 2153

Dear Sir/Madam

**Pre-Application Discussion No. PAD13/0078**

**Proposal: Construction of a Supermarket with Basement Car Parking**  
**Property: 28 – 38 Flora Street, Kirrawee**

I refer to the PAD meeting held on 8 October 2013 about the above development proposal. The following Council officers attended the meeting: Evan Phillips (Planner), Luke Murtas (West Assessment Team Leader), Briarna Lee (Student Planner), Annette Birchall (Planner / West Assessment Team Leader (Acting)), David Jarvis (Architect), Barbara Buchanan (Landscape Architect), Tarek Barakat (Community Places), James Gogoll (Engineer), Jogarao Jayanti (Stormwater Engineer).

The purpose of this letter is to provide a summary of the issues discussed at the meeting and provide further information that will assist you in preparing your development application. Council cannot provide you with certainty that your proposal will be supported until your development application is lodged and Council's Environmental Assessment Officers carry out a detailed assessment.

Your development application will need to be supported by a Statement of Environmental Effects addressing all relevant Environmental Planning Instruments, and the detailed planning controls contained in Sutherland Shire Development Control Plan 2006. AN economic Impact Assessment must also accompany the application.

**The Site and Proposal:**

The subject site is located on the southern side of the Flora Street, and takes in a number of individual allotments between Nos. 28-38.

The combined land is rectangular in shape with a site area of approximately 9,552m<sup>2</sup>. There is a fall of 5m – 6m from the north of the site to the south eastern corner of the site. Currently, the individual sites are occupied by industrial buildings, warehouses and commercial land uses. There are

multiple vehicular access points servicing the sites and three (3) large established ironbark trees are located within the front of No. 38 Flora Street. Adjoining development to the west and east comprises industrial development and buildings of a similar scale. Immediately to the rear (south) of the site is the Cronulla railway line. Opposite the subject site and road reserve to the north is the former Kirrawee Brick Pit, the subject of a Part 3A Concept Plan approval including a significant amount of retail and residential floor space, including two supermarket tenancies.

The proposal involves the construction and fitout of a 'Woolworths' supermarket with basement level car parking. The supermarket has a gross floor area of approximately 4800m<sup>2</sup> with the main entry/ lobby to the supermarket located on the north western frontage of the development.

Two (2) vehicular crossings (combined entry/ exit) are proposed within the road reserve for customer vehicles to access the basement level and open car parking area on the western side of the site. A total of 236 customer car parking spaces are proposed within the development, largely at basement level. A separate vehicular crossing is proposed via the eastern side of the site for the purpose of providing a formal loading dock and delivery point.

All existing structures and site vegetation are proposed to be removed and the proposal includes the relocation of an existing electricity substation from the eastern to the western edge, landscaping within the front of the site, and supermarket signage.

#### Comments on the Development Concept:

Council provides the following comments in respect of the concept plans presented for consideration at the meeting.

#### 1) Zone Objectives and Locality Strategy

The subject land is located within Zone 7—Mixed Use Kirrawee under Sutherland Shire Local Environmental Plan 2006 (SSLEP2006). 'Shops' are a permissible form of development within the zone. The relevant objectives of the zone are as follows:

- (a) to take advantage of the zone's access and profile from the Princes Highway,*
- (b) to create development that mixes employment activities within a liveable urban environment,*
- (c) to encourage high employment-generating development that encompasses high technology industries, commercial display centres and light industries compatible with the existing locality and adjoining residential buildings,*
- (d) to allow the zone to support a live-and-work culture that provides for local employment and acts as a transition between employment activity and strict residential uses in the surrounding neighbourhood,*
- (e) to permit light industrial uses that are compatible with the desired future residential amenity of the zone,*
- (g) to ensure development is carried out in a way that addresses the street concerned (achieving an attractive and vibrant streetscape) and reinforces surveillance of the public domain,*

- (h) to make provision for a prestigious gateway development capable of employing a substantial workforce,*
- (i) to provide a substantial area of public open space for employees, residents and the local community,*
- (j) to facilitate the re-vitalisation of the Kirrawee Town Centre and the Kirrawee railway station precinct,*
- (k) to ensure any expansion of retail activity within the zone maintains the role and function of Kirrawee Town Centre and does not adversely impact on the sustainability of other centres in the Sutherland Shire,*
- (l) to ensure any new shops integrate with and support the existing Kirrawee Town Centre,*
- (m) to ensure development is compatible with, and does not adversely impact on, the amenity of the surrounding residential area, particularly in terms of air pollutants, noise emissions and visual effects.*

Any future application for a supermarket must clearly demonstrate consistency with the objectives of the zone. As the proposal is for a new building in an urban renewal area, careful consideration should be given to the urban design-related objectives of the zone, in particular those relating to creating 'liveable urban environments'; creating attractive and vibrant streetscapes; and integration with the fabric of the existing Kirrawee Centre.

Any proposal must also demonstrate that it is consistent with the locality strategy for Kirrawee specified within Chapter 2, Part 1 of Sutherland Shire Development Control Plan 2006 (SSDCP2006). The intention of the strategy is to provide a strategic framework for the future planning and design of the Kirrawee Town Centre. A key aspect of the approach is to prioritise the public domain. New development should therefore respond to the desired future scale and character of the streets and open space areas.

The concept proposal for a standalone supermarket development does not wholly satisfy the provisions specified within Council's LEP and DCP for the Flora Street East Precinct. In very general terms, the plans envisage taller, mixed-use development along the southern side of Flora Street, and the form of the Brick Pits redevelopment is more substantial again. The breadth of the proposed supermarket will leave a significant 'missing tooth' in the streetscape. Where there is a conflict or substantial variation to the Council's policy, a well founded justification is required to be submitted for Council's consideration.

Further, a suitably qualified consultant must undertake an economic impact analysis prior to developing the concept further. The DA will be required to demonstrate that the proposed supermarket will not undermine the viability of the existing Kirrawee shops and nearby centres (including, but not limited to, Sutherland, Gymea, Kareela, and Jannali), as well as the retail hierarchy established by Council's planning controls.

The economic analysis must take into account the re-development of the Brick Pit site located opposite the subject site to the north and the cumulative economic impacts of the two developments, particularly the proliferation of full-line supermarkets and their impact on the viability of nearby centres.



## 2) Draft Plan

As you may be aware, Council has proposed a new Local Environmental Plan, known as Draft Sutherland Shire Local Environmental Plan 2013 (DLEP 2013), to replace SSLEP2006. The following key provisions of DLEP 2013 are relevant to this proposal:

- The site is proposed to be zoned to Zone B4 – Mixed Use.
- A maximum building height of 16 metres
- A maximum floor space ratio of 1:1

Council recently made a decision to commission a public hearing before proceeding any further with the draft plan. This decision has significantly reduced the imminence and certainty associated with the draft plan to the point where it cannot be given substantive weight in the assessment of development applications.

Prior to lodging a DA, it is recommended that you check the status of the draft instrument as these provisions are subject to change or may have been gazetted (that is, formally adopted and replace the provisions of the current SSLEP2006).

## 3) Built Form and Urban Design

The following development standards specified within SSLEP2006 are of relevance to the proposal:

- Maximum building height – 3 storeys;
- Maximum floor space ratio – 1:1.

The location of the supermarket entrance on the western side of the development is considered appropriate given its general connectivity and orientation towards the Kirrawee Centre. The height of the development appears to be keeping with the existing built form established by adjoining properties on the southern side of Flora Street, but, as above, will not align with the desired future character of the area.

The visibility and location of the loading dock including the high blank panel wall on the front boundary is a significant concern and this element of the building should be revisited. Providing these facilities to a more 'back of house'/ internal area should be further explored so as to minimise the visual impacts of the development. The roof treatment (i.e. fifth façade) requires further refinement given the high level of visibility anticipated from future residences within the Brick Pit site. Developing a servicing strategy to conceal plant and equipment should be developed at this stage.

The application should have regard to the existing street edge pattern and the desired character for the Flora Street precinct laid out in Council's DCP to arrive at a more appropriate scheme of street setbacks. The DCP requires active commercial/ retail frontages and building envelopes to be provided in accordance with the Map 17 (Chapter 3 Part 8 SSDCP2006). Providing nil or

minimal street and side setback as per the submitted plans is not in keeping with these provisions.

Consideration to the principle aims of Crime Prevention through Environmental Design (CPTED) contained within Chapter 3 of SSDCP2006 should be given with regards to safety and security issues. Paths and entry points within and around the perimeter of the site and development must be designed for accessibility and adequate lighting must also be considered. Further detail and refinement of the pedestrian entry should be given so that entrances are clear and legible from the street. The potential for graffiti and vandalism within, and at the rear of the development, and trolley system management requires consideration. Appropriate measures shall be indicated in any future submission.

A report prepared by an appropriately qualified person that provides an assessment of the proposed building against the relevant accessibility requirements and the Building Code of Australia (BCA) should accompany any future submission.

Any future development application will also need to detail the fit-out of food preparation and storage areas, sanitary and waste facilities, and exhaust discharge points. These will be assessed by Council's Environmental Health Unit and will need to comply with the relevant legislative requirements and standards.

Signage requirements for the proposal should be considered and developed so as to ensure an appropriate signage strategy is integrated into the design of the building. Consideration to the relevant objectives and controls for advertising contained within Chapter 10 of SSDCP2006 and SEPP 64 – Advertising and Signage should be given. Glare nuisance from internally illuminated signage (if proposed) must be avoided given the anticipated future residential development opposite the site.

1. Council's Architectural Review Advisory Panel (ARAP) provides a pre-application service for larger developments that would normally need to be referred to ARAP during the assessment period. If the panel has fundamental concerns about site planning or the architectural design concept, these can be addressed before detailed plans are prepared and the final DA design is submitted.

#### 4) Engineering Matters

##### a) Traffic

The proposal is classified as 'traffic generating development' for the purposes of the Infrastructure SEPP. As such, any subsequent development application will be referred to the NSW Roads & Maritime Service for concurrence. Council's Engineer has raised concern regarding the cumulative impacts of land uses within Flora Street, and potential conflicts associated with the concept on-street parking arrangement, the location of the loading/ delivery point, and the provision of two (2) car park entry points that

provide a dual entry / exit arrangement. The proposal presents a significant potential for clashes with the approved loading dock of the Brick Pits development.

To this end, any development application must be accompanied by a detailed traffic assessment prepared by an appropriately qualified traffic engineer. The traffic assessment will need address the suitability of the parking provision, the design of the car parking area and associated access points within Flora Street. The report will need to clearly demonstrate that the development will not result in any adverse traffic, safety or amenity impacts to the locality. The assessment should also take into account the future development of the Brick-Pit site and include traffic management measures where required, including a detailed loading and servicing management plan for the supermarket, which would be incorporated into conditions of consent if the application were approved.

It is further recommended that you consult with Council's Civil Assets team to determine frontage and public domain works, footpath requirements (e.g. widths), associated boundary alignment levels, and the potential undergrounding of electrical wires before commencing any final engineering design.

b) Car Park, Delivery & Access-way

Car parking at a rate of 6.1 spaces per 100 square metres of gross leasable floor area will be applied as prescribed in the Roads & Maritime Services (RMS) guide to traffic generating development. The provision of 236 car spaces for 4800m<sup>2</sup> of supermarket floor area is deficient, according to this guide. The car park shall be designed to accord with AS2890.1:2004 and the following:

- A B99 car;
- Minimum head height of 2.2m;
- 'User Class' 3A;
- 'Disable' bays designed to AS2890.6:2009.

The delivery docks and access-way must be designed to accord with AS2890.2:2002 and the following:

- To cater for Articulated Rigid Vehicles (ARV) and enable entering and departure from the property in a forward direction;
- Assume the Road Reserve will have a 3.7m wide footpath verge on both sides and parallel on-street parking;
- Provide ARV turning templates to enter and leave the property in a forward direction (allowing for the truck to cross the centre line of the Road to enter the property);
- Provide ARV turning templates to manoeuvre the Flora Street Bath Road intersection (assuming the on-street parking is fully occupied), Flora Street Oak Road intersection (assuming the on-street parking is fully occupied) and the Bath Road Pacific Highway intersection (assuming the on-street parking is fully occupied).

c) Stormwater Management

The sites are currently served by a practical stormwater drainage system that traverses the State Rail Authority corridor to the south and then to Council's stormwater drainage system. Council's desired stormwater drainage strategy is to have a practical and legal drainage system which will require the creation of a drainage easement through the rail corridor.

Should obtaining a drainage easement be unsuccessful, other strategies could include draining to Flora Street. The Flora Street option will require a full drainage analysis of the Flora Street drainage system and would most likely require Council's drainage infrastructure to be augmented and extended. Any future application shall be accompanied by a detailed hydraulic design conforming to the requirements of SSDCP2006 and relevant standards.

d) Landform and Earthworks

The site directly adjoins a rail corridor and established industrial developments. Further geotechnical investigation into the basement design and the impacts of the excavation on the adjoining landform requires specific attention. As the land is located within 25m of an existing rail corridor, formal referral to State Rail Authority will be required in any future application.

Potential contamination of the land from past land uses will need to be addressed in any development application. Reference should be made to SEPP55 and its associated guidelines for further information on how to address this particular issue. In the first instance, a preliminary site investigation must be undertaken. If the preliminary investigation identifies that contamination is, or is likely to be present, a detailed investigation must be undertaken. If contamination levels on the site exceed the endorsed limits for the proposed use, a remedial action plan must be prepared.

5) Landscaping

Any future landscape proposal will need to positively address the streetscape considering the long term vision of Flora Street as a pedestrian friendly place within a mixed-use zone and part of a town centre. The landscaping should complement the scheme approved across Flora Street at the Brick Pits site and follow the principles for indigenous planting set out in Council's DCP.

There are three large Ironbarks in the north – west corner of the site which currently contribute to the character of the streetscape and the area generally. These trees are remnants of the Sydney Turpentine Ironbark Forest vegetation community (STIF), an Ecologically Endangered Community (EEC) which should be retained as part of an entry forecourt to the supermarket and further reinforced by new street trees of STIF species. A significant tract survives within the Brick Pits site and outlying remnants should be preserved where possible.

The proposed on-slab surface carpark on the western side of the site will be hot and visually unattractive. Canopy trees in planter boxes, preferably fully or partially set down into the slab, should be incorporated into the landscape

design so as to break up the cars and provide shade and shelter. Additional plantings of small trees and shrubs in deep soil along the western and southern boundaries should also be considered.

6) Future Operation and Residential Amenity

The site is identified as a 'Low Activity Area' under Chapter 9, Part 7 of SSDCP2006. Operation of the premises between the hours 10.00pm – 6.00am (i.e. outside of base hours) will require further consideration to objectives and relevant provisions of Council's Late Night Trading Policy. A Plan of Management will be required to accompany any future development application in accordance with the SSDCP2006 and associated Specification.

The development site is located opposite a future intense residential land use to the north (Brick Pit Development). Consideration of the visual and acoustic privacy and general amenity (e.g. noise / odour) of the residences will be required in any future development application. This includes the possibility of light spill and noise associated with operation and vehicular movements, as well as odour and exhaust management.

Conclusion:

The proposed supermarket is permissible within the zone, however, as a highly intense use will present significant environmental and economic impacts and 'clashes' with the approved Part 3A development to the north. The massing of the building does not align with the desired future character of the area.

Any future application will need to clearly demonstrate that the proposed supermarket is not in direct conflict with the zone objectives, locality strategy and relevant provisions specified for Kirrawee. The development must be of nature and scale which will not detract from the role and function of the Kirrawee Town Centre, or undermine the viability of centres within the Local Government Area.

The cumulative impacts and potential conflicts of the development with the Brick Pit re-development are a concern. This is primarily with regard to traffic, parking, access and public domain/ pedestrian way related issues.

The concept does not take advantage of the constraints and opportunities of the site, such as the existing vegetation, general streetscape character and opportunity for works to enhance the public domain. The overall design and massing of the built form in terms of its bulk, setbacks and contextual fit also requires further resolution.

It is important to note that the information provided in this letter is based on the planning instruments applicable at the time of writing. You should make yourself aware of any subsequent changes to legislation or local planning controls before lodging your development application.

For detailed information about how to prepare and lodge a development application, please visit

[www.sutherlandshire.nsw.gov.au/Building\\_Development/Development\\_Requirements](http://www.sutherlandshire.nsw.gov.au/Building_Development/Development_Requirements)

This web page contains a “DA Guide” and an online tool called “Development Enquirer” which searches the applicable planning instruments for the planning controls relevant to your site and your proposed development.

Council’s Development Enquiry Officers are also available to assist you with the lodgement requirements for your application (ph 9710 0520).

Please contact Council as soon as possible if you believe any of the above information to be incorrect, or if you need any clarification of the advice provided. Your initial point of contact should be Evan Phillips on ph. 9710 0569 or via [ephillips@ssc.nsw.gov.au](mailto:ephillips@ssc.nsw.gov.au) as this is the staff member who will most likely be responsible for the assessment of your development application.

Yours faithfully

Mark Adamson  
Manager –West Environmental Assessment Team  
for J W Rayner  
General Manager

## Architectural Review Advisory Panel

Proposal:

**Pre-DA Referral (ARAP) - Supermarket with Basement Parking**

Property:

**28, 30, 32, 34, 36 & 38 Flora Street KIRRAWEE NSW 2232**

Applicant:

**Fabcot Pty Ltd**

File Number:

**ARAP13/0012**

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The following is the report of the Architectural Review Advisory Panel Meeting held on 24 October 2013 at the Administration Centre, Sutherland Shire Council, Eton Street, Sutherland. The report documents the Panel's consideration of the proposed development described above.

### **“4. Consideration of ARAP13/0012 – Pre-DA Proposal for a Commercial Development at 28-38 Flora Street, Kirrawee**

Council's Evan Phillips, Peter Brooker and Luke Murtas outlined the proposal for the Panel, including providing details of Council's relevant codes and policies.

Stephen Blaxland, Mark Watson, Josh Hollis, Roy Vigdor and Carlo Di Giulio addressed the Panel regarding the aims of the proposal and the constraints of the site.

#### Description of the Site and Proposal

The site is located on the southern side of Flora Street, opposite the future 'Brick Pit' redevelopment. It is within walking distance of Kirrawee Town Centre and Kirrawee Rail Station. It is within Zone 7 – Mixed Use under Sutherland Shire Local Environmental Plan 2006 (SSLEP 2006), with a site area of 9,552sqm and a fall of 5-6 metres from the north to the south-eastern corner of the site. The maximum building height is 3 storeys and maximum FSR is 1:1 (9,552sqm).

The proposal is for the construction and fit-out of a supermarket with basement level car parking. The supermarket has an area of 4,800sqm, with the main entry/lobby located on the north-western frontage.

The site inspection revealed three (3) large established ironbark trees located on the north-western frontage.

### Context

The site is within an evolving context adjacent to the Kirrawee Town Centre. It is opposite a mixed-use development on the former Kirrawee Brick Pits site that will incorporate high density residential and extensive retail facilities, including a large supermarket, on an extensive landscaped site. This site is in an existing industrial precinct and has the railway line to the rear. The proposed supermarket will be visible from the Kirrawee Rail Station platform.

Flora Street, the development's address, is a significant street in this part of the Shire as it links Kirrawee and Sutherland Rail Stations and gives access to local shops, churches and schools. It has the urban potential to be a major civic avenue.

According to Council's Kirrawee Master Plan this single level, single-use retail proposal is contrary to local aims and objectives and well short of the site's development potential. Given the site's proximity to a high number of residents and the adjacency to the Kirrawee Town Centre, the proposal does not adequately respond to the street activation objectives of Council's Master Plan.

There is an existing successful neighbourhood centre of local shops associated with Kirrawee Rail Station which is near the site. Given these contextual issues, is another supermarket in its generic form appropriate?

### Scale

This 'big box' supermarket, which is sited over five consolidated industrial lots, is not compatible with the grain of the future buildings or the new development opposite on Flora Street, where residential units over street level retail are carefully articulated to offer appropriate residential grain.

Although having a large footprint, this proposal is low and not compatible with the desired future character of the site, which is 3-4 storeys - 3 storeys in SSLEP 2006 and likely to be 4 storeys in DSSLEP 2013. At one single storey above ground level, the proposal is under scaled and does not respond to the anticipated 4 storey scale that will be developed on both sides of the street.

The Applicant has made some effort to increase the height with a 4.2m springing height and a tall entry element, but the building will still be largely out-of-scale with any adjacent future medium-density residential development.

### Built Form

The built form of the proposal is very basic and typical of single-use retail developments in urban and suburban contexts. As such, the proposal offers very little to its specific context or to the street in terms of address, access and legibility. In light of local objectives for the area, the proposal may jeopardize the success of future street activity through the minimization of active street retail and dedication of vehicular manoeuvring to two thirds of the site's street frontage.



Some effort has been made to articulate the building along the Flora Street frontage and to the on-grade car park, but the forms are largely coarse and blank due to the function of a supermarket, which will be most evident from Kirrawee Rail Station platform, a significant viewing point. Given that the supermarket roof will be visible from the platform and the residential tower blocks on the Kirrawee Brick Pit site opposite, it should be treated as the fifth elevation and be designed to be seen.

The relocation of the sub-station to the north-western corner is in conflict with the three significant trees on the site.

#### Density

1) Refer to 'Scale'. The proposal is not compatible with the desired future character of medium-density, mixed use zoning. It is well under the density requirements for the site, which raises a question as to how it will fit in with a future, high density mixed-use context.

#### Resource, Energy and Water Efficiency

Apart from possible roof water re-use, this was not demonstrated. Any development which covers most of the site, such as this one, should detain and re-use stormwater and consider permeable paving to reduce the large amount of stormwater run-off. Solar hot water and PV panels should also be considered on the north-facing roof. Western glazing needs sun shading.

2) Apart from water re use, the proposal appears to adopt very few energy saving measures or innovative environmental strategies. For a proposal of this scale, this falls well short of reasonable environmental responsibilities and community expectations. With such a large roof for example, it is difficult to sustain an argument against the provision of natural lighting, natural ventilation or the incorporation of solar panels. This circumstance should be reviewed.

3)

#### 4) Landscape

The landscape is inadequate. The substation should be relocated to the south-western corner from the north-western corner, which has three significant trees. Rhetoric about 'vibrant streetscape' is not supportable with the current proposal. It is not clear how the rear setback will be treated.

There is no recognition of existing ironbark trees on the site. The removal of three existing trees is likely to arouse considerable community distress given what has happened to the Brick Pit development. The proposal offers little to the street in respect of landscaping as it removes existing trees and has little front setback.

#### Amenity

Currently the proposal assigns about 70% of its main facade to vehicular manoeuvring, including the provision of a large truck turning bay - referred to as a "courtyard" in the project presentation. Less than 10% of the front facade is actually assigned to pedestrian access. This is unacceptable and must be reviewed. The turning bay and loading bay must be relocated to the rear or

side so that the major length of the facade can be dedicated to active street uses.

Rather than focus solely on supermarket retail, the Panel strongly advocates that a mixed-use development would better suit the subject site. It is recommended that the proposal incorporate additional uses such as street facing specialty shops and even residential uses to better address the aims and objectives of the local master plan.

The zone objectives are for an active, pedestrian-friendly street frontage and this has not been achieved. Though the north-eastern corner is quite lively, this only represents up to a third of the street frontage, while much of the frontage is given over to vehicular movement and much of the footpath is interrupted by driveways. Consider a pull-in area for trucks at the rear or side of the site rather than at the street front.

The on-grade car park could be improved by shade trees or structures. There is no outdoor amenity area for staff.

#### Safety and Security

With single use retail only, the proposal limits the capacity of the proposal to provide active street uses and passive surveillance. The number of vehicular street crossings and the expansive turning area (referred to as a “courtyard”) are also queried, especially from a safety and security perspective.

The proposed glazing to the western façade of the supermarket will assist in surveillance of the on-grade car park.

#### Social Dimensions

This well-located site should accommodate lively retail uses to continue the successful Kirrawee Town Centre and to serve future residents, as well as accommodate affordable residential units. Though a supermarket is a valuable function for nearby residents, it should be integrated with other uses, as per the objectives of the Mixed Use Zone.

Apart from the convenience of an additional retail outlet, only limited social benefits can be inferred from the current proposal. Evidence should be shown that this new supermarket will not adversely affect the existing Kirrawee Shopping Centre, which consists of local businesses and provides a pleasant neighbourhood social centre.

#### Aesthetics

The proposal adopts various graphic and modelling techniques to extend its limited engagement with the street and local context. These include: a raised parapet; windows to interior spaces; and applied “leaves” to the blank loading wall. However, these surface measures only highlight the inadequacy of the proposal in providing genuine street activities, interfaces and experiences. As a leader in new development for this evolving precinct, it would be preferable if the proposal were to incorporate more of the objectives of the master plan,

expected environmental techniques and a genuine mix of uses, and express the resultant proposal in a modern, refined and urbane manner.

### **Recommendations and Conclusions:**

The Panel does not endorse the current proposal due to its failure to adequately address the urban design, environmental, landscape and design quality issues noted above.

This single-function proposal does not meet the objectives of the Mixed Use zone. It should only be allowed in a revised form if the Applicant can demonstrate that the objectives can be met by modifications and additional development in the future – ie that active commercial street front elements and residential development above, with the required car parking and landscaping, can be added in a future stage. To treat the proposal as a short-term ‘disposable’ one is not acceptable. The large footprint, single storey supermarket, with associated truck circulation appears too tight for this site, since it does not achieve active street frontage or effective landscaping or required parking numbers.

Any future proposal for a large consolidated industrial site on Flora Street, such as this, should to be presented with a precinct master plan that includes Flora Street and the Kirrawee Town Centre.”

Frank Stanisic  
ARAP Chairman

05 November 2013

## Architectural Review Advisory Panel

Proposal:

**Construction, Fit-Out and Use of a Building as a Shop with Basement Parking**

Property:

**28, 30, 32,34, 36 & 38 Flora Street KIRRAWEE NSW 2232**

Applicant:

**Macroplan Dimasi**

File Number:

**DA13/1192**

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The following is the report of the Architectural Review Advisory Panel Meeting held on 16 January 2014 at the Administration Centre, Sutherland Shire Council, Eton Street, Sutherland. The report documents the Panel’s consideration of the proposed development described above.

**“3. Consideration of Development Application No. 13/1192 – Commercial Development (Woolworths) at 28-38 Flora Street, Kirrawee – JRPP Application**

Council’s Peter Brooker and Luke Murtas outlined the proposal for the Panel, including providing details of Council’s relevant codes and policies.

Carlo Di Giulio, Mark Watson, Roy Vigdor, Tim Rogers and Mike Fairhurst addressed the Panel regarding further development of the proposal and how they have addressed the issues raised by the Panel at the previous meeting.

Description of the Site and Proposal

The site is located on the southern side of Flora Street, opposite the future ‘Brick Pit’ redevelopment. It is within walking distance of Kirrawee Town Centre and Kirrawee Rail Station. It is within Zone 7 – Mixed Use under Sutherland Shire Local Environmental Plan 2006 (SSLEP 2006). The maximum permitted building height is 3 storeys and maximum permitted FSR is 1:1 (9,552sqm). The site area is 9,552sqm with a fall of 5-6 metres from the north to south-east corner of the site.

Council’s urban strategy maps in the Kirrawee Town Centre diagrammatically indicates a rear setback of around 6 metres for landscaped open space to support mixed uses on the site.

The proposal is for the construction and fit-out of a supermarket with basement level car parking. The supermarket has an area of 4,800sqm with the main entry lobby located on the north-western frontage.

The site inspection revealed three (3) large established ironbark trees located on the north-western frontage.

### Applicant's Submission

#### Context

As noted at the last ARAP review, Flora Street is earmarked as a major link to the town centre and intended to be developed with mixed-use, street defining buildings. Hence the proposed single use retail outlet was not favoured – the Panel's view has not changed. In keeping with the aims of the street, the site has an approx. 6 metre rear setback to allow for continuous landscape for the benefit of future residential uses. Another significant and related contextual issue to be addressed is the visibility of the site from the rail corridor and the housing opposite on Flora Street; the building will be overlooked and the roof should be designed as a fifth elevation.

#### Scale

The scale of the proposal is slightly improved with the rotation of the massing and increased height. However, the incompleteness of the façade, with its large manoeuvring court, remains unsightly and clumsy. The manoeuvring court and various vehicular entry points remain a dominant feature of the façade, which is clearly at odds with the aims and objectives of the street. The entry corner remains underwhelming, lacking control and presence. It would be preferable to actually provide a second level – incorporating street-facing offices for example – than simply to raise the front facade artificially.

The scale of the proposal and its presentation to the street could also be improved by continuing the large northern fascia and folding it around the western entry side and elevating the ceiling within. If the manoeuvring court cannot be relocated - as it should be - it may be worth investigating internalising the manoeuvring court by extending the building across its front alignment.

#### Built Form

While modifications have improved the street interface, the boundary bulk and poor street presentation of back-of-house facilities continue to be a major issue and may infer that the proposal simply does not fit on this site in the future urban setting. Peripheral circulation for the trucks right around the building may solve some of these issues and should be investigated. The open railway side corridor may instead of being landscaped, be kept open to allow trucks to manoeuvre around the building without a covered requirement.

#### Density

5) The permitted density is not achieved and creates poor street definition. The extent of site coverage continues to be a problem.

### Resource, Energy and Water Efficiency

There is no evidence of solar panels on the roof, despite its extensive area. Although the roof has been raised, artificial lighting only is proposed, which is not acceptable.

A water retention tank has been provided.

### Landscape

The proposed landscape continues to have two major problems related to tree removal and the planting bed along the store frontage:

#### *Tree removal*

The arborist's report indicates the importance of the trees however the TPZ creates problems for the proposal. Given three trees are to be removed, twelve trees must replace them. The Panel recommends that three new trees be located in the deep soil on the north-western corner, one in the street and two in the garden bed. This will involve relocating the fire booster pump to the street frontage and moving the stairs to the underground carpark south by one car parking space.

#### *Planting bed along the store frontage*

A landscape plan has not been submitted so it would appear that there is a discrepancy between plans and photomontage. The proposed wall and shrub planting create CPTED issues and should be removed, leaving the storefront visible.

### Amenity

As a commercial proposal, it should contribute to the street and create street activity as far as possible. While the proposal is improved, it still dedicates most of its street frontage to vehicular access and egress. The manoeuvring court is unsightly and best relocated. Internal spaces should be naturally lit and ventilated as far as possible – there is no evidence of this. No recommendations were followed regarding the retention of trees, which is very disappointing for such a built-out site.

### Safety and Security

The entry/exit for vehicles is right next to the pedestrian inclinator; which may create safety issues. Refer to 'Amenity' regarding the manoeuvring court. The hedge along the entry ramp may impede clear visual access.

There are possible CPTED issues, depending on whether the plan or montage is correct.

### Social Dimensions

More consideration should be given to street presence by way of visual engagement with the interior market garden ambience and 'plaza' entry with seating, etc. As it is presented now, the proposal seems to be disconnected from street pedestrian experience and car focused.

The executive summary focuses on '*market-based justification*'. This approach is contrary to furthering social dimensions and could be considered an exhausted paradigm in 2014.

### Aesthetics

More screens and a 'finer' climatic response might be employed, especially for the lower levels. The supersized overhang is fine but the western glass wall, etc could do with some screening. It would be preferable to increase street height by relocating the office area to the street facade from its currently proposed disappointing location. This would then provide northern sun and view for the occupants.

### **Recommendations and Conclusions:**

The Panel does not support the project in its current form, which has fundamental deficiencies. A reduced store area; increased rear setback; and redesign and relocation of the vehicle manoeuvring area, street frontage and planting is required as a minimum, to improve the building's design and interface to the public domain.

In light of Council's aspiration for the 'boulevard-like' upgrade of Flora Street, the proposal's large manoeuvring area compromises the presence of the building on the street. This needs serious consideration. The rear boundary issues discussed have led to a design that is awkward and clumsy in its street presentation and site organisation, and also robs the rail boundary setback of its continuous line of trees.

The Panel noted the failure of the Applicant to submit a revised "Sketch-up" model of the DA to assist the Panel in its review of the project.

As part of the resolution of design quality issues, the applicant is requested to respond to the suggestions of this ARAP report. The Applicant's response should be descriptive and adopt a format of Panel suggestion and response, clearly transcribing the suggestion from the report, followed by the Applicant's response under each Principle."

Frank Stanisic  
ARAP Chairman

03 February 2014

DA13/1192

**NSW POLICE FORCE**

Sutherland Local Area Command

113 – 121 Flora Street  
Sutherland NSW 2232

Tel: 02 9542 0899

Facsimile: 02 9542 0708

Ref.No: DA 13/1192

21 January 2014

General Manager,  
Sutherland Shire Council  
Locked Bag 17,  
Sutherland NSW 1449

RECEIVED

30 JAN 2014

BHAR

RE: Development Application DA 13/1192  
Construction, fitout and use of a building as a shop with basement parking  
28-38 Flora St, Kirrawee

In line with the Crime Prevention Guidelines of the New South Wales Environmental Planning and Assessment Act, 1979, Section 79C, Sutherland Local Area Command has conducted a *Safer by Design Crime Risk Evaluation* as requested by Sutherland Shire Council, on the proposed development relating to construction, fitout and use of a building as a shop with basement parking for Woolworths Supermarkets, 28-38 Flora St, Kirrawee.

The proposed development may introduce new (potential) victims, crime opportunities and offenders to the development site and its surroundings. It is possible, therefore, that reported crime will increase in the future.

Crime Prevention Through Environmental Design (CPTED) treatment options should be considered for the proposed development in order to reduce opportunities for crime.

Yours sincerely,

Superintendent Julian Griffiths  
Sutherland Local Area Commander

FILE LOCATION

PBRO



## Safer by Design



***Crime Risk Evaluation:  
Construction, fitout and use of a building as a shop with  
basement parking***

***Woolworths Supermarket  
28 to 38 Flora St, Kirrawee***

***DA 13/1192***

a report prepared for  
Sutherland Shire Council

By

NSW Police Force  
Crime Management Unit  
113-121 Flora Street, Sutherland

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January 2014



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### **Disclaimer**

New South Wales Police has a vital interest in ensuring the safety of members of the community and their property. By using the recommendations contained in this evaluation, any person who does so acknowledges that:

1. It is not possible to make areas evaluated by NSW Police absolutely safe for members of the community or their property;
2. It is based upon the information provided to NSW Police at the time the evaluation was made;
3. The evaluation is a confidential document and is for use by the consent authority referred to on page 1 only;
4. The contents of this evaluation are not to be copied or circulated other than for the purposes of the consent authority referred to on page 2.

NSW Police hopes that by using the recommendations contained in this document criminal activity will be reduced and the safety of members of the community and their property will be increased. However, it does not guarantee that all risks have been identified, or that the area evaluated will be free from criminal activity if its recommendations are followed.





## ***Section 79C of the Environmental Planning and Assessment Act and Crime Prevention***

In April 2001, the NSW Minister for Planning introduced Crime Prevention Guidelines to S79C of the Environmental Planning and Assessment Act, 1979. These guidelines require consent authorities to ensure that development provides safety and security to users and the community. "If a development presents a crime risk, the guidelines can be used to justify modification of the development to minimise crime risk, or, refusal of the development on the grounds that crime risk cannot be appropriately minimised".

The Guidelines contain two parts. "Part A details the need for a formal crime risk assessment (Safer by Design Evaluation) to be done in conjunction with trained police, and Part B outlines basic Crime Prevention through Environmental Design (CPTED) principles and strategies that can be used by consent authorities to justify the modification of proposals to minimise risk" (DUAP 2001:2).

### ***Crime Prevention through Environmental Design***

Crime Prevention through Environmental Design (CPTED) is a crime prevention strategy that focuses on the planning, design and structure of cities and neighbourhoods. It reduces opportunities for crime by using design and place-management principles that reduce the likelihood of essential crime ingredients from intersecting in time and space.

Predatory offenders often make cost-benefit assessments of potential victims and locations before committing crime. CPTED aims to create the reality (or perception) that the costs of committing crime are greater than the likely benefits. This is achieved by creating environmental and social conditions that:

- Maximise risk to offenders (increasing the likelihood of detection, challenge and apprehension);
- Maximise the effort required to commit crime (increasing the time, energy and resources required to commit crime);



- Minimise the actual and perceived benefits of crime (removing, minimising or concealing crime attractors and rewards); and
- Minimise excuse-making opportunities (removing conditions that facilitate the rationalisation of inappropriate behaviour).

CPTED employs four key strategies. These are Surveillance, Access Control, Territorial Reinforcement and Space/Activity Management.

### **Surveillance**

*Natural surveillance (NS)* is achieved when normal space users can see and be seen by others. NS highlights the importance of building layout, orientation and location; the strategic use of street design; landscaping and lighting. NS is a by-product of well-planned, well-designed and well-used space. *Formal (or Organised) Surveillance (FS)*, is achieved through the tactical positioning of guardians. An example would be the use of supervisors on station platforms, or the placement of a taxi rank within eyesight of a station entry. *Technical Surveillance (TS)* is achieved through mechanical/electronic measures such as CCTV, help-phones and mirrored building panels. TS is commonly used as a “patch” to supervise isolated, higher-risk locations.

There is a proven correlation between poor lighting, fear of crime, the avoidance of public places and crime opportunity (Painter, 1997). Australia and New Zealand Pedestrian Lighting Standard 1158.3.1 requires lighting engineers and designers to factor in crime risk and fear when selecting lamps and lighting levels.

### **Access Control**

Access control measures restrict, channel and encourage people, bicycles and motor vehicles into, out of and around targeted sites. Wayfinding, desire-lines and formal/informal routes are important crime prevention considerations.





Access control is used to increase the time and effort required to commit a crime and to increase the risk to criminals. *Natural Access Control (NAC)* includes tactical use of landform and waterways, design measures including building configuration; formal and informal pathways, landscaping, fencing and gardens. *Mechanical/Electronic Access Control (MEAC)* includes the employment of security hardware and *Formal (or Organised) Access Control (FAC)* includes on-site guardians such as employed security personnel.

### ***Territorial Reinforcement***

Criminals rarely commit crime in areas where the risk of detection and challenge are high. People who have guardianship or ownership of areas are more likely to provide effective supervision and to intervene in crime than passing strangers. Effective guardians are often ordinary people who are spatially 'connected' to a place and feel an association with, or responsibility for it. *Territorial Reinforcement (TR)* uses actual and symbolic boundary markers, spatial legibility and environmental cues to 'connect' people with space, to encourage communal responsibility for public areas and facilities, and to communicate to people where they should/should not be and what types of behaviour are appropriate.

### ***Space and Activity Management***

Space and activity management strategies are an important way to develop and maintain *natural* community control. Space management involves the formal supervision, control and care of the public domain. All space, even well-planned and well-designed areas need to be effectively used and maintained to maximise community safety. Places that are infrequently used are commonly abused. There is a high correlation between urban decay, fear of crime and avoidance behaviour.

### ***Evaluation***

This evaluation was requested by Sutherland Shire Council for DA 13/1192 which is described as construction, fitout and use of a building as a shop with basement parking, being, Woolworths Supermarkets, 28-38 Flora St, Kirrawee.



Primary focus areas include:

- Design detail;
- Pedestrian access (internal and external); and
- Place management.

### ***Sutherland Local Area Command (LAC)***

The Sutherland Local Area Command (LAC) is on the southern fringes of Sydney, between Sydney and Wollongong. Geographically the command is the largest in the Central Metropolitan Region being 300 square kilometres in size. A large part of the LAC consists of the Royal National Park. The major suburbs are Sutherland, Menai, Engadine and Gymea. There are a total of 28 suburbs within the command. Adjoining Sutherland LAC includes Miranda LAC to the east, Wollongong LAC to the south, Liverpool LAC to the west, Bankstown LAC to the north-west and Hurstville LAC to the north. Sutherland LAC is situated within the Sutherland Shire which includes Miranda LAC and is a major thoroughfare for motorists and commuters travelling between Sydney and Wollongong.

Sutherland LAC has almost 80 schools within the area, indicating a high percentage of juveniles living and visiting the area. Overall population is in excess of 130,000.

The proposed development site is situated a short distance away from Kirrawee shopping precinct which consists of small businesses, cafes, restaurants, licensed premises and a railway station.

The proposed development is located amongst industrial and commercial businesses. The area opposite is currently a large vacant block, however, plans are underway to turn into a commercial area.

Currently during night hours, street lighting takes effect. Factory lighting has little to no effect in illuminating the roadway and surrounding area, therefore the area is dimly lit during nightfall.

Paperwork received has not included traffic or pedestrian studies, however, Flora St, Kirrawee is used at a minimum, therefore, traffic and pedestrian flow through the area is light.





## Crime Ratings

Reported crime statistics have been used to help identify 'crime likelihood'. These statistics are based on raw data, however, can be provided by Police, if required, or for more accurate statistics can be acquired by the Bureau of Crime Statistics. In NSW, crime statistics are gathered and analysed in geographical areas referred to as Police Local Area Commands (LACs). This development is located within Sutherland Local Area Command and the following incident categories and rating have been identified for the Local Area Command in which the development is located:

| Incident         | Likelihood Values based from Raw Data Statistics |        |          |          |              |
|------------------|--|--------|----------|----------|--------------|
|                  | Highly Likely                                    | Likely | Moderate | Unlikely | Not assessed |
| Malicious damage |  |        |          |          |              |
| Stolen M/Vehicle |  |        |          |          |              |
| Assault          |  |        |          |          |              |
| Break & enter    |  |        |          |          |              |
| Stealing         |  |        |          |          |              |
| Robbery          |  |        |          |          |              |

\* The Sutherland LAC Intelligence Unit has revealed the above crime types occurred within a 500 metre radius of the proposed location and for the previous 24 months.

The aforementioned statistics are based on the following raw data and are as follows: Assault – 16; Break & Enter – 12; Drug detection – 27; Fraud – 40; Malicious damage – 23; Robbery – 1; Stealing – 31; Street offence - 8. The number of proactive interventions is as follows: Move On – 185; Person Search – 449; Vehicle Search - 153.

The total number of incidents recorded from the above statistics has registered 945 incidents across all crime types. Of these statistics, 557 x public place/outdoor, 183 x business/commercial premise, 87 x public transport service or hub, 55 x car park, 53 x residential premise, 7 x Educational premise, 2 x health premise and 1 x religious premise. Of the total number of incidents, 129 of the 945 incidents were associated with alcohol.

It must be noted that the aforementioned statistics incorporates Kirrawee Railway Station and Kirrawee commuter car park, which is in close proximity of the proposed development.





Kirrawee Railway Station is positioned on the Sutherland to Cronulla train line service, which attracts a large amount of commuters from all over Sydney, due to Cronulla Beach being the only accessible beach in Sydney to have a train line servicing.

Police have inspected the area of the proposed development and have established numerous opportunities for potential crime. This includes possible perpetrators utilising the darkness and secludedness of the rear railway and other adjoining properties. In addition, the proposed car park to accommodate 180 vehicles is below street level, therefore, the risk is greater for safety and possible number of incidents, due to limited sightlines.

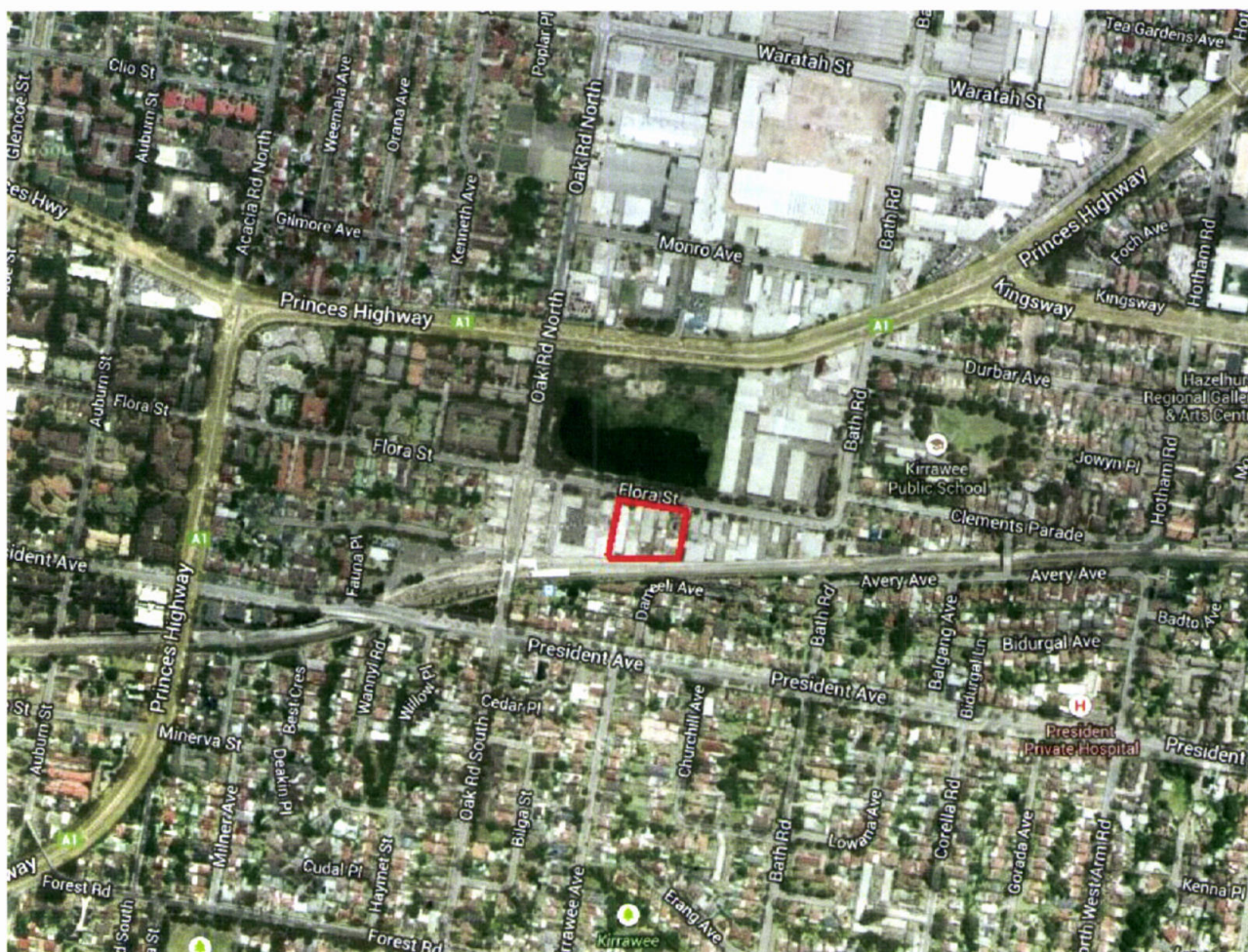
The proposed development will involve large sums of cash and items. The use of armoured cash vehicles should be utilised to transport cash. The combination of light traffic and pedestrian flow at night could cause a potential risk to staff, property, delivery vehicles and the surrounding area.

### ***Evaluation Rating***

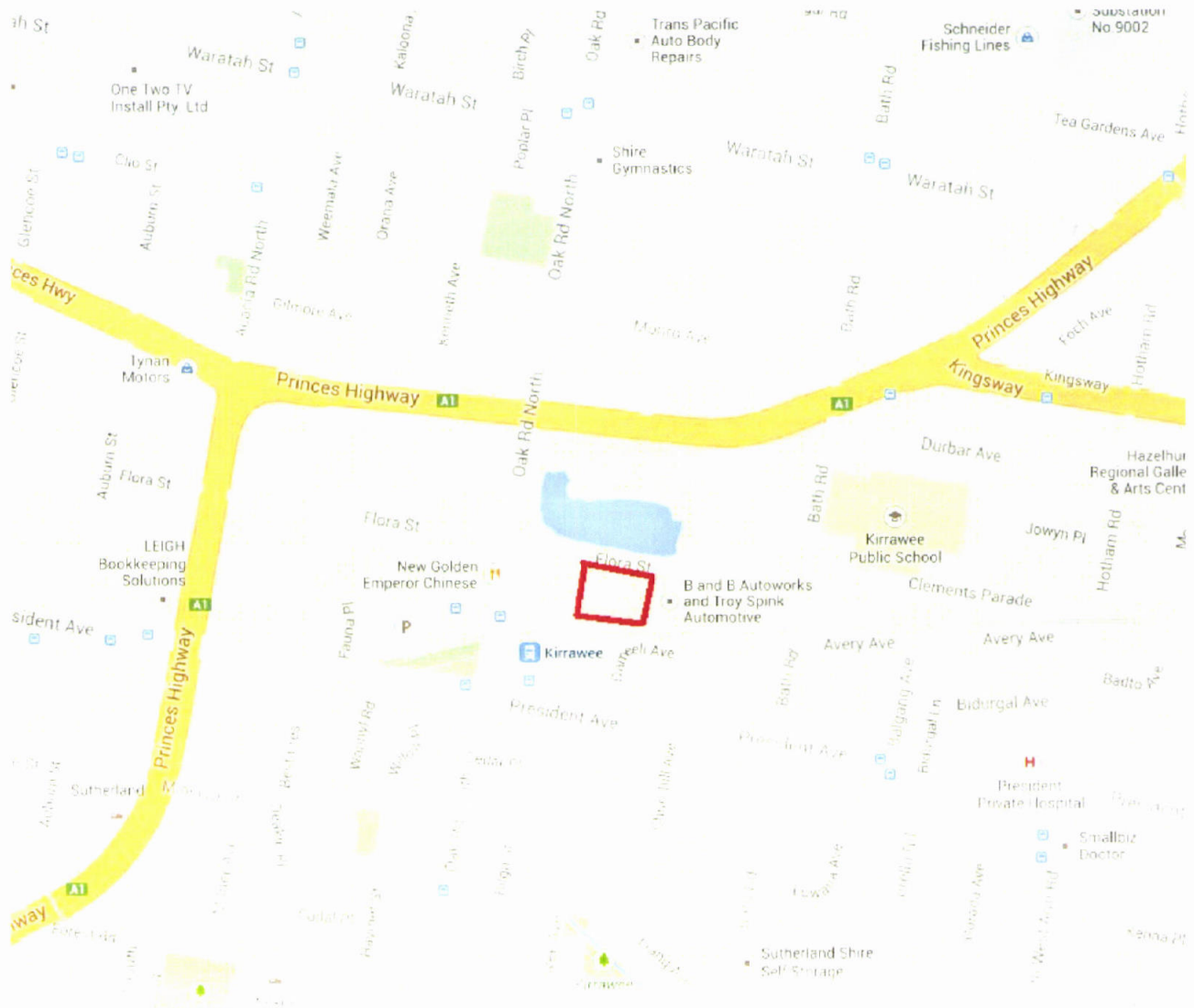
After conducting a Safer by Design Crime Risk Evaluation for the proposed development the crime risk rating has been identified as **LOW**. This is on a sliding scale of low, moderate, high.



View of proposed area









## ***Issues and Recommendations***

Working through the preliminary drawings, a number of areas of concerns have been identified for clarification and concern.

Clear sight lines provide a higher measure of safety through natural surveillance; this may come at the expense of some privacy on all levels.

Illegible boundary markers and confusing spatial definition make it easy for criminals to make excuses for being in restricted areas. The proposed development application requires good use of perimeter fencing and gates at various entry points.

Consideration should be given to “Staff Only” car spacing, especially for staff working late at night. The basement car park includes access by the general public. Given this, Police believe access should be restricted by the installation of security shutters on the basement level. Police would recommend that all authorised staff are allocated access cards to





provide temporary activation of security shutters to the basement areas and lobbies. This should reduce the possibility of residents being outside or in unauthorised areas.

Police recommend that the underground car parking areas be painted white to greatly help to reflect light. Painted facilities not only look larger and more spacious than unpainted car parks, but can greatly reduce the number of lights required to illuminate the car park and on-going energy costs.

Police would suggest the use of CCTV to monitor the common areas, lobbies, access/egress driveways, delivery dock and underground car parks to ensure resident safety.

### **Car Park Area**

The area needs to be marked clearly with good visibility for customers entering and exiting the car park and give good natural surveillance into the car park. Opportunities for concealment located within the car park area in void spaces identified need to be addressed. Clear signage needs to be in place throughout the car park to indicate exit and emergency exit routes, no parking areas, direction to facilities and disabled car spaces to minimise the risk of antisocial behaviour and use of the car park for skateboarding, burnouts, illegal parking, etc. Emergency services car parking spaces also need to be allocated and clearly marked in the car park.

### **Loading Dock Area**

Access to the loading dock area needs to be restricted to authorised personnel only. External areas providing access into the shopping centre and areas that are left unattended for long periods of time can provide opportunity for anti-social behaviour, malicious damage and theft and as such need to be closed off after hours or when not in use or covered by Security or CCTV. Clear signage on the entrance to the loading dock area needs to be in place to prevent excuse making for trespassers, illegal parking and safety for heavy vehicle access. Security risk areas or potential hiding areas also need to be addressed. These areas must display signage to reflect this.



Clear sight lines to the loading dock area by way of appropriate landscaping needs to be in place so as to provide a sense of natural surveillance and clear visibility to pedestrians on the street.

## **Additional Information**

### **Warning Signs**

- Effective signage and/or directional signs should be installed to provide guidance to visitors in locating office/rooms/prohibited areas etc as well as areas of interest such as visitor and/or disabled parking, exit/entry areas,
- Warning Signs can assist in controlling activities and movements throughout the premises, car park and grounds.
- Post warning signs around the perimeter of the premises to warn possible intruders of what security treatments have been implemented to reduce opportunities for crime.
- *Warning. Trespassers will be prosecuted.*
- *Warning. This property is under electronic surveillance.*
- *All property has been marked for Police identification.*

### **Landscaping**

- Keeping trees & shrubs trimmed can reduce concealment opportunities and increase visibility within the property.
- Remove obstacles & rubbish from property boundaries, footpaths, driveways, car parks & buildings to restrict concealment & prevent offenders scaling the boundary fence.

### **Security Lighting**

- Install security lighting in and around your property, particularly over entry/exit points to create an even distribution of light with no glare, e.g. sensor lighting or floodlighting.
- Leave a limited amount of internal lighting on at night to enable patrolling Police, security guards or passing people to monitor activities within and around the premise.

### **Building Design**

- Maintain clear sightlines between the street, neighboring property and the buildings.
- Limit the number of entry/exit points to restrict unauthorised access.

### **Surveillance Equipment**

- Surveillance equipment can enhance the physical security of your premise and assist in the identification of people involved in anti-social or criminal behavior.
- CCTV Cameras should be installed in and around the property to maximise surveillance opportunities.





- Digital or video technology should be used to record images from the cameras.
- Recording equipment should be installed in a lockable, restricted area where person/s cannot tamper with the equipment.
- Videotapes/DVD's need to be replaced quarterly to maintain quality images.
- Installed surveillance equipment should be maintained in working order and regularly tested.
- If the surveillance system is installed, use it.
- Staff members should be trained in the correct use of the system.
- Any surveillance system should be manufactured and installed by a qualified and reputable company and regularly function tested.
- Ensure that the requirements of the Surveillance, Telecommunications and Privacy and any other applicable Act are adhered to.

### **General**

- Computer passwords should be changed regularly to restrict access to avoid misuse by past and present members of staff.
- Emergency evacuation plans should be implemented and maintained by the organisation to assist patrons, staff and Emergency Services in the event of an emergency. This plan should be prominently displayed.
- Staff members should be suitably trained in evacuation procedures.
- Police strongly recommend the use of a reputable security company to monitor the property outside operating hours.

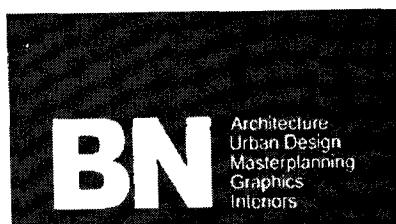
NSW Police hopes that by using the recommendations contained within this report, criminal activity will be reduced and the safety of residents or tenants and their property will be increased. However, it does not guarantee that all risks have been identified, or that the area evaluated will be free from criminal activity if its recommendations are followed.

NSW Police would like to thank you for your interest in improving the security of your property and in preventing crime in our community. Should you require any further information please contact Senior Constable Dave HAYES at Sutherland Police Station on 9542 0899.

Regards,

Dave HAYES

Senior Constable, Crime Prevention Officer, Sutherland Police



20<sup>th</sup> February 2014

**Architectural Review Advisory Panel Response No 2**

**28 -38 Flora Street KIRAWEE NSW 2232**

**DA13/1102**

**Prepared by BN Group Architects**

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**Sydney**  
Brisbane

This report has been prepared in response to the report received from the Architectural Review Advisory panel number two.

As previously stated the proposal is for a Supermarket operation and not a mixed used development. While Council's Master Plan enables the integration of residential uses our client, a national retailer, believes this will negatively affect the efficiency, and operational considerations of the proposed Supermarket use.

**Context**

We appreciate the intent of Sutherland Shire Council that Flora Street be *developed as a mixed-use, with street defining buildings*, and in that regard we do not believe council are looking for an homogenous built outcome with poor activation at street level. As such we ask the Review Panel and Council to consider the wider context and the benefits a project such as that contemplated by Woolworths can offer in delivering a vibrant, active and attractive urban outcome.

Currently the existing Kirrawee commercial area located around the Station acts as a small neighbourhood local centre. If it was attractive to increase the number of small shops into Flora Street and indeed activate Flora Street it probably would have already happened but it has not.

The major game changer to the Urban environment and commercial make up in this locality will be the Brick Pit project, adding additional retail, car parking and residential population along with open space amenity.

Based on the most current plans we have of this development the proposal reinforces the pedestrian connection between the current Kirrawee shops and the new development through the open space parkland and into a large plaza area surrounded by shops.

It should be noted here that the shops being shown along Flora Street are single depth and are likely to orientate themselves inward and away from Flora Street.

Without a logical customer 'footfall' along Flora Street there is little chance to achieve Councils aim of a successful mixed-use outcome with street defining buildings. At best they will be medium density residential developments set back from Flora Street



rather than defining a street edge.

The introduction of Woolworths to the south of Flora Street, and opposite the main mall of the Brick Pit development will encourage pedestrian activity along the south side of Kirrawee shops, have a closer relationship to the existing shops, enable commercial/retail infill to occur on the south side of Flora Street and the existing shops, and assist with the contextual integration of the Brick Pit development and that of the current Kirrawee Centre.

Without the Woolworths development there is a risk that the current shops will be isolated and become a secondary retail offer to the Brick pit development.

In regards to the 6 metre rear setback, which the Advisory Panel report under 'Built Form' suggest could be left open to 'allow trucks to manoeuvre around the building'. In this regard we suggest the Panel acknowledges that the landscape setback is a response to a residential development outcome which this is not. And that the landscape is not a fundamental feature given the relationship to the railway line.

In this regard we have taken the view that a 6.0 metre setback is wasted along the rear of the building and we would rather use this to articulate the building façade fronting Flora Street. That is not to say that the presentation to the south is not important and indeed Woolworths are well aware of the visibility from the Rail corridor and is looking to exploit this exposure with and a simple but attractive built form presentation. We do not see this as the 'back of the building' as would likely occur if it was treated as a loading dock.

It should also be noted at this time that given the likelihood of medium density residential being developed adjacent in the future driveways around the perimeter site promoting truck circulation would create a major acoustic and visual impact for adjacent future residents. Again this has lead us to design the ability for service vehicles to have the least visual and acoustic intrusion onto the site and indeed to utilize setbacks for manoeuvring of vehicles quickly and safely. It should also be remembered that the amount of time a truck is actually in the manoeuvring area is minimal over the period of the day and the space would predominantly be viewed as a setback of the built form in the streetscape. Unlike adopting a perimeter driveway and rear loading dock that will always look like and be treated as a loading dock.

### **Scale**

We acknowledge the proposal does not have residential above it and is of a single use, and in this regard does not reflect a 3-4 storey mixed-use development. As previously expressed appreciating the intent of the scale and articulation of the fabric of the street, considerable effort has been put into the design to express the modulation and articulation of the built form in order to avoid the 'big box' typology or indeed a 'single storey' feel.

Since the initial design placed before the Panel the high level element that expresses

the entry at the north western end has been turned to create a greater impact onto the street, improving the overall scale of the building and eliminating the overall 'low' or single storey character of a single use development. This has been appreciated in the current panel response. We do not agree that the corner is 'underwhelming' or that the manoeuvring court is unsightly or clumsy. As with good design we have looked to unlock opportunities and utilise the land and typography to deliver, in our opinion, a valuable urban asset in the context of Kirrawee.

We are somewhat confused by the suggestion in the ARAP report that we 'continue the large northern fascia and fold it around the western entry side'. The on grade car park will have a pleasant scale which would be overshadowed if we were to return the Northern façade. It would also water down the prominence of the Architectural massing to the North. Equally given its orientation there would be a predominance of solid wall which would detract from any rising of the ceiling.

We are not in favour of internalizing the manoeuvring court since the height of the truck would mean the screen wall would be in effect solid and eliminate visibility into the store which currently is a feature of the design and a desired outcome onto Flora Street.

### **Built Form**

We have discussed under 'Context' why we did not progress the peripheral circulation for trucks option and that the acoustic and visual outcome ultimately would not add value to surrounding future development.

As previously noted Woolworths has certain criteria in terms of layout and operational constraints that need to be satisfied to ensure the success of the business, however Woolworths is also very mindful of the urban context and the integration with surrounding urban environments and as such each Supermarket looks to respond to the characteristics of individual sites.

With regards to Kirrawee the proposed design has gone to considerable effort to maximize the activation on to Flora Street. A majority of the frontage onto Flora Street is glazed and the travelators have been relocated since the previous scheme to increase the movement of customers along the active face of Flora Street frontage.

In this regard the built form clearly articulates the pedestrian entry at the north-west corner, with a potential future pedestrian crossing that could connect the future brick pit project. The remainder of the façade is largely glazed encouraging views into and out of the Supermarket.

We believe the built form has a clear address both vehicular and pedestrian, has good access through utilizing the slope of the site, and is very legible from the street.

## **Density**

We believe the overall form of the building will enable it to sit well within the density of the surrounding future developments. The issue is related to scale and in particular how this proposal is viewed in conjunction with surrounding mixed use developments. We see the approach as being positive and adding urban vitality.

## **Resource, Energy and Water Efficiency**

As previously noted in our earlier report a project of this nature requires very little in the way of water usage and as such there is limited requirement for roof water re-use, however where possible this indeed is done to assist with irrigation and grey water for amenities.

While we acknowledge the ideals of utilizing PV panels on roofs with such an extensive area we have yet to find a project in Australia that enables this to happen due to commercial considerations.

We acknowledge that the western glazing will need sun shading.

In regards to natural lighting and natural ventilation, Supermarkets and in particular Supermarkets of this size require air-conditioning and hence it becomes problematic to introduce natural ventilation for such a use. In addition some natural light is good but this must be balance with Section J compliance and the presentation of product which can look 'washed out' with too much natural light.

The client does not wish to incorporate additional uses such as residential since this will compromise the operation of the Supermarket in this particular instance.

We believe an active and pedestrian-friendly street frontage has been achieved through the modifications in the design since the panel last reviewed the project.

Customers appreciate open on-grade parking and given the number of covered car parking spaces in the undercroft car park we do not believe it is necessary to require additional shade for on grade car park spaces.

## **Landscape**

We were defer any response for Landscape issues to the Landscape Architect.

## **Amenity**

Please refer to Context above.

### **Safety and Security**

The Supermarket operation and customer usage frequency will assist with passive surveillance along the street, beyond that of strip shops. In addition we have discussed under 'Built form' the approach taken to the layout of the loading area and service lane to improve safety and security in and around this proposal.

### **Social Dimensions**

This is outside our area of expertise in terms of commenting on the ability of the supermarket to adversely affect existing Kirrawee Shopping Centre. What the Supermarket will do is encourage the pedestrian linkages between the proposed Brick-pit development retail environment and that of the existing Kirrawee strip shopping area.

Rather than these retail precincts working in isolation the strength of introducing a full line supermarket will add to the commercial connectivity and ability to activate the south side of Flora Street up to the existing Kirrawee Centre which would otherwise become difficult due to lack of foot traffic.

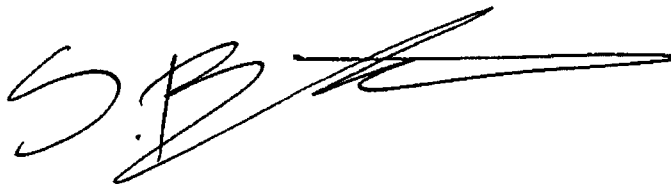
The introduction of Woolworths Supermarket will increase the ability to deliver the Master plan of an activated street frontage along Flora Street.

### **Aesthetics**

Modifications to the Flora Street frontage has reduce the extent of blank walls and increase the amount of shop front activation along with height fronting onto Flora Street.

### **Conclusion**

As previously expressed in our earlier response to ARAP report while the proposal is not of a mixed-use nature we believe the overall design will add value to the streetscape of Flora Street, encourage the linkage between Kirrawee Centre and the Brick Pit development, assist commercially activate the southern side of Flora Street, produce an urban focal point within the extent of Flora Street and provide added value to the future surrounding developments.

A handwritten signature in black ink, appearing to be 'S.B.' followed by a stylized, elongated flourish.