

20 February 2019

Our Ref: 18-014

Larissa Ozog
Georges River Council
PO Box 205
HURSTVILLE NSW 1481

Dear Larissa,

RE: DA2018/0178 - 12-24 STANLEY STREET, KOGARAH

This submission has been prepared by City Plan Strategy & Development (CPSD) on behalf of the applicant, Kogarah 048 Service P/L, to respond to Council's written request for further information (RFI) dated 28 September 2018.

Since the issue of the RFI, the applicant met with Council on 17 October 2018 to discuss the RFI and propose solutions to address Council's concerns. On 1 November 2018, the applicant issued Council a document presenting design solutions, inclusive of sketches. On 29 January 2019, the applicant met with Council to present draft final amended plans.

Appendix 1 of this letter provides a response to each item raised by Council.

This letter is to be read in conjunction with the following documentation:

- **Appendix 1** - Cover response to RFI prepared by CPSD;
- **Appendix 2** - Architectural plans, design verification statement and design report prepared by Scott Carver;
- **Appendix 3** - Landscape plans prepared by Turf Design Studio;
- **Appendix 4** - Letter from ACOR in relation to water storage requirements;
- **Appendix 5** - Transport Impact Study and Swept path diagrams prepared by Traffix;
- **Appendix 6** - Advice Notice prepared by ADP Consulting in relation to acoustic treatment;
- **Appendix 7** - Plantroom acoustic advise prepared by PKA Acoustic Consulting
- **Appendix 8** - Operational Waste Management Plan prepared by Elephants Foot; and
- **Appendix 9** - Revised Clause 4.6 Variation Report prepared by CPSD.



City Plan Strategy & Development P/L
ABN 58 133 501 774

We trust the attached is satisfactory for your continued assessment of the development application. Should you have any queries please do not hesitate to contact Lotti Wilkinson (Senior Project Planner) on 02 8270 3500 or lottiw@cityplan.com.au.

Yours Sincerely,

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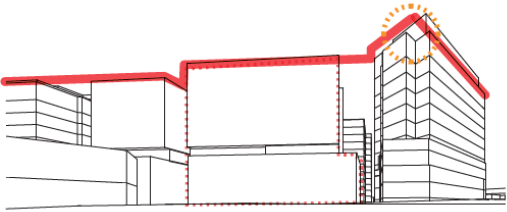
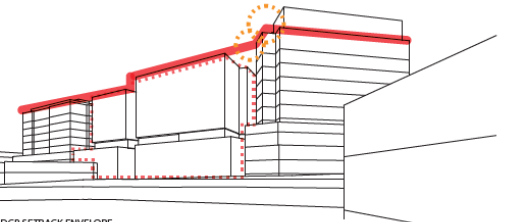
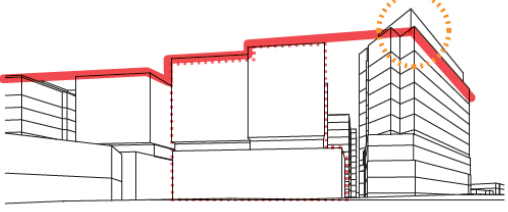
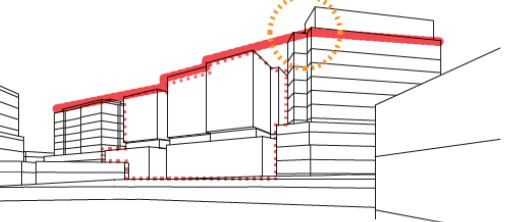
David Ryan
Executive Director

APPENDIX 1 - COMBINED RESPONSE

Council Comment	Response
ARCHITECTURAL DESIGN <p>- The application was referred to an Urban Design Consultant for an assessment against the provisions of SEPP 65 and the ADG in August 2018. The Panel raised a number of concerns regarding the design of the development.</p> <p>- The formal comments provided by the Consultant will need to be addressed and these comments can only be obtained by lodging a GIPA application (former Freedom of Information Application). You will need to contact Council separately to obtain this report. Please call Georges River customer service centre on 9330 6400 or fill out the Informal Access Application form link attached</p>	<p>The amended design addresses the concerns raised by the GMU report (Urban Design Consultant) by incorporating the following key features:</p> <p>Landscaping and Deep Soil</p> <ul style="list-style-type: none"> ▪ Reduced building footprint and increased deep soil zone to meet the minimum ADG requirement. ▪ Increased 2m front setback from Stanley Street to enable more landscaped area. ▪ Increased building setback from the western boundary line to open up the adjacent deep soil zone. ▪ Increased landscaping to Stanley Lane. ▪ Improved level transition from street level to ground floor apartments by providing terraced gardens. <p>Tower Setback</p> <ul style="list-style-type: none"> ▪ Adjusted the building form of the tower to achieve the building setback requirement. ▪ Provided a minimum setback of 9m from the centre line of Stanley Lane. ▪ Proposed setback of 6m minimum from eastern and western boundary. <p>Building Height</p> <ul style="list-style-type: none"> ▪ Reduced building height to ensure all habitable rooms remain under the permissible height plane.
LANDSCAPING <p>- The deep soil area along the south-western corner of the Site seems to include an electricity kiosk, stairs and hard paved entry area as part of its calculated area.</p>	<p>The deep soil area has been amended and recalculated to exclude the electricity kiosk, stairs and hard paved area. The architectural plans confirm that 313m² is provided as deep soil, representing 13% of the site area.</p>

<ul style="list-style-type: none"> - The amount of deep soil planting at the ground floor level is deficient of the minimum requirements of the ADG. It is requested that more deep soil landscaped areas are provided given the large integrated nature of the Site. 	<p>The built form has been amended to address this matter and includes an additional 2m strip to Stanley Street.</p>
<ul style="list-style-type: none"> - RL's of the ground floor apartments and associated terraces need to be included to consider relative levels. 	<p>The updated plans show RL's as well as sections to describe intent.</p>
<ul style="list-style-type: none"> - The terraces at the ground floor level should include some additional landscaping and greenery in the form of planter boxes for additional screening or included elements that will break up the amount of hard paved surface area. 	<p>The terraces fronting Stanley Street each incorporate a landscaped frontage exceeding 2 metres in width. As detailed on the landscape plans, quandong trees are proposed along this frontage to assist in screening and breaking up the amount of hard paved surface area.</p>
<ul style="list-style-type: none"> - The deep soil zone in front of the plant room on the ground floor is shown as hard paved on the ground floor plan (AD-DA104). This area should include a tall tree and soft landscaped area to enhance a natural green buffer zone between developments. 	<p>This area is no longer proposed as a deep soil zone. Unencumbered access is required in this area to enable safe access to and from the fire stairs.</p>
<p>Council's Landscape Officer has requested the following information:</p> <ul style="list-style-type: none"> - For the quantities of all trees, shrubs and groundcovers provided to ensure they match with abbreviations for all trees, plants and groundcovers used upon the plan view. - The rooftop seems to have a lot of wasted paved surfaces. It is requested that more deep soil retaining beds and hence more trees, shrubs and groundcovers be incorporated. 	<p>The landscape plan has been amended to ensure consistency with all abbreviations of trees, plants and groundcovers detailed on the plan view.</p> <p>A series of spaces, or 'outdoor rooms' are defined by raised planters. The planters have been offset an appropriate distance from the edge to satisfy safety requirements. Path widths have been rationalised to reduce total paving area, whilst ensuring compliant equal access connections to each space. The most significant area of paving is shaded by a pergola structure to reduce heat loading, whilst providing a functional hardstand entertaining area below.</p>
<p>ADG REQUIREMENTS</p>	
<ul style="list-style-type: none"> - Non-compliance with the western setback of 6m. It is requested that the 3 bedroom apartments be redesigned to comply with this provision. 	<p>The layout has been redesigned and the proposal is now largely compliant in providing a 6m western setback. A small part of the western apartments at ground floor level to level four infringe upon the setback by approximately 1.9m. However,</p>

	the western elevation is treated effectively with limited openings along this elevation to ensure that residential amenity will be maintained.
- Rear setback off the lane is only 1.2m at ground floor level which does not provide much separation or buffer between the building and the roadway. The upper levels of the building fail to comply with the 9m setback requirement in some parts. The building's relationship to the rear laneway and the properties to the south should be improved and offer better physical separation to reduce the visual bulk and dominance when viewed from Stanley Lane.	<p>In relation the rear setback off Stanley Lane, the building glass line varies from 2.7m to 5.8m. A landscaped buffer (planter boxes) and ground floor terraces are proposed at 1.2m which will provide suitable separation between the road and the apartments.</p> <p>In relation to the rear setback at the upper levels, the design has been amended to comply with the 9m setback from the centre of Stanley Lane</p>
- There is also minimal greenery and soft landscaped area to this lane with terraces (some raised above the ground level) lacking any greenery or screening.	The amended landscape plan details additional raised planters along the Stanley Lane frontage. The kiosk located in the south-west corner has been repositioned and additional planting is proposed along its frontage to assist in softening its façade. Please note that the location and orientation of the kiosk is subject to Ausgrid Approval.
- The front of the building fails to comply with the required 8m front setback at the upper levels.	<p>As described in the design statement, the massing proposal refers to the key objectives of the Kogarah North Precinct plan which includes instilling a greater streetscape presence, street activation and walkability in the precinct through the "secondary corner" provision and through site link objectives which apply to the adjacent site 18-24 Victoria Road</p> <p>The proposed design responds to and supports the objectives of the Kogarah North Urban Design Strategy through aligning the western tower form to the neighbouring proposal's tower alignment. This shift in the urban rhythm of the tower alignments enhances the corner condition of Stanley Street and Victoria Road and identifies the location of the through site link.</p> <p>Diagrams are provided overleaf to describe the analysis by Scott Carver:</p>

 <p>DCP SETBACK ENVELOPE</p>  <p>DCP SETBACK ENVELOPE</p> <p>scott carver</p>	 <p>PUSHING FORWARD PORTION OF TOWER 2M, TO ALIGN WITH NEIGHBOURING BUILDING HIGHLIGHTING THROUGH-SITE LINK AND FURTHER ARTICULATES THE URBAN FORM STEPPING WITH THE TYPOGRAPHY</p>  <p>DEFINING THE CORNER EDGE AND WRAPPING AROUND TO EMPHASIS THE SECONDARY CORNER CONDITION</p>
<p>PARKING, STORAGE AND LOADING</p>	
<p>- Spaces should be numbered within each basement area so that they are easily referenced.</p>	<p>The amended architectural plans have been updated to reflect this requirement.</p>
<p>- Individual storage spaces should be individually numbered also for easier reference.</p>	<p>The amended architectural plans have been updated to reflect this requirement.</p>
<p>- There is no motorcycle parking catered for within the building. Some designated motor bike parking shall be included due to the scale and density of the development.</p>	<p>Motorcycle parking is included. The amended architectural plans have been updated to reflect this requirement.</p>
<p>- Accessibility from the loading area and bin holding area is complex and convoluted. The relationship between these uses and internal spaces needs to be simplified and rationalised and easier access through to the lobby and units or to the garbage area needs to be provided. This may require the main switch and telecommunications room to be relocated.</p>	<p>The amended architectural plans show the garbage management path.</p> <p>Waste room at B1 (RL 14.25) provides a garbage room to collect and keep waste collected from a single chute as well as the 38 required recycling bins.</p> <p>Building management will wheel garbage bins to loading area for collection. Lift platform provided to connect B1 (RL 14.25) and Loading Area level (RL 16.050).</p>

<p>- The water storage areas are substantial in size. It is requested that details in relation to their operation and function be provided.</p>	<p>The attached letter from ACOR (Appendix 4), confirms that the water storage has been reduced from 430,000L to 100,000L for combined fire hydrant and sprinkler water storage. The 25,000L potable water storage has also been removed as it is no longer required.</p>
<p>TRAFFIC AND ENGINEERING</p>	
<p>- Kogarah DCP 2013, Part E4 Kogarah North Precinct requires the provision of a Transport Impact Study (TIS) for proposals which exceed 25 dwellings. Subsection 16 refers to the requirements that are to be addressed by the TIS as larger developments generate broader impacts to roadways within the locality.</p>	<p>Refer to the accompanying letter prepared by Traffix at Appendix 5 which addresses the applicable DCP requirements.</p>
<p>- Council's Traffic Engineer has raised a number of issues and requires further information in relation to the following;</p> <ul style="list-style-type: none"> o The development exceeds Council's parking requirements by 80 spaces and there is required further explanation why this substantial exceedance is occurring. o In respect to GFA calculations pursuant to the Kogarah LEP, any parking spaces in excess of the minimum requirements are to be included in GFA and this would exceed the FSR and require a Clause 4.6 Statement to justify the non-compliance. o The swept path diagram provided for the loading truck 8m MRV in the traffic report and the vehicle entrance and exit into the car park is not sufficient. Details will need to be resubmitted showing the swept path diagram in relation to the whole entire width of Stanley Lane, boundary to boundary, demonstrating that the vehicle can access the loading zone. 	<p>In response:</p> <ul style="list-style-type: none"> ▪ The quantum of parking proposed responds to current levels of demand within the area. ▪ The Kogarah North DCP states that residential parking is to be provided in accordance with the ADG Guidelines and SEPP 65. <p>The ADG relies on the RMS standards set out in the Guide to Traffic Generating Developments which are recommended minimum parking spaces. Using the RMS parking rates, the proposed development requires 99 car parking spaces.</p> <p>The definition of GFA in the Kogarah LEP excludes car parking to meet any requirements of the consent authority. Given there is no maximum parking rates prescribed by the RMS, the proposed quantum of parking meets the requirements of the consent authority.</p> <p>We further note Council has recently approved a development application at the neighbouring site at 2-10 Stanley Street (DA2017/0483). The proposal exceeded the recommended minimum parking spaces stipulated in the Guide for Traffic Generating Development</p>

	<p>however, the additional parking provision was not considered as GFA.</p> <p>Any parking spaces in excess of the minimum requirements should therefore not be included as GFA (this would only be effective if parking requirements were expressed as a specific number or maximum number to be provided).</p> <ul style="list-style-type: none"> ▪ Notwithstanding, parking for the proposed development has been reduced from 175 to 116 car parking spaces. This effectively condenses the provision of parking from four basement levels to three. With this reduction, the proposed parking is only 17 spaces in excess of the minimum required 99 spaces. ▪ Refer to the Architectural Plans provided at Appendix 2 for further detail relating to parking. ▪ Amended swept path diagrams are provided at Appendix 5.
ACOUSTIC REQUIREMENTS	
<p>- The acoustic report submitted with the application prepared by PKA Acoustic Consultants dated 26 April 2018 has recommended that the location of the mechanical plant room on the eastern side on the ground floor of the apartment building should be reconsidered and relocated as it is within close proximity to residential receivers (RR3) and will require substantial acoustic treatment.</p> <p>- This issue will require to be addressed in more detail or the plant room be relocated.</p>	<p>ADP Consulting in their letter dated 24 January 2019 (Appendix 6) have stated that they have made allowances for acoustic silencers to be applied to each fan within the plantroom, and that final acoustic recommendations by PKA will be coordinated during detailed design once equipment schedules are available.</p> <p>PKA in their letter dated 25 January 2019 (Appendix 7) confirm acceptance of ADP allowances regarding the plantroom acoustic treatment and confirm that the plantroom in its current location will be designed to meet the site-specific noise goals as per Council's requirements.</p>
WASTE	
<p>- Kogarah DCP Part E4 stipulates the need for a waste and recycling chute system for buildings with more than 3</p>	<p>An amended Operational Waste Management Plan is provided at Appendix 8.</p>

storeys. A chute does not seem to be incorporated in this scheme.	Single chute and recycling bin collection (1 per floor) are included in the proposal.
<ul style="list-style-type: none"> - Please ensure that the garbage room satisfies Council's waste requirements which require; <ul style="list-style-type: none"> o The property will require 6 X1100L bins collected twice a week and 38 X240L recycling bins collected once a week. 	Storage area for 38 recycling bins is now included.
HEIGHT	
<ul style="list-style-type: none"> - The proposal does exceed the height limit and it is advisable that the development be amended to comply with this development standard given the large and integrated nature of the Site. 	An amended Clause 4.6 Report has been prepared and is provided at Appendix 9 .
<ul style="list-style-type: none"> - The elevations do not seem to include and reflect the height of the cooling tower located on Level 11. 	The elevation has been updated.