

28 April 2022 631.30290-L01-Council RFI-Traffic-v2.0-20220428.docx

Doma Interchange Development Pty Ltd C/-SLR Consulting Suite 2B, 125 Bull St Newcastle West, NSW, 2302

Attention: Geoff Dimarhos

Dear Geoff

The Store Mixed Use Development (DA2021/01530) City of Newcastle Request for Additional Information Traffic and Transport Response

1 Introduction

Reference is made to the above Development Application matter, and specifically, the City of Newcastle Request for Additional Information (RFI) dated 11 February 2022, a copy of which is included at **Appendix A** for reference. This letter documents responses to the following traffic and transport related RFI matters:

- 3.1 Car parking
- 3.2 Bicycle Parking.

This advice has been prepared to specifically address the City of Newcastle RFI items and the findings supersede those presented in the October 2021 *Traffic and Transport Assessment* submitted with the original Development Application.

The Council RFI matters are reproduced herein in **bold italics** with individual responses prepared by SLR.

2 Council Item 3.1 – Car Parking

2.1 Council RFI

"A review of the parking referenced as Option 1 by the traffic consultant and acknowledging a previously accepted rate variation of 1 space per 75 GFA for commercial floor space has confirmed that the parking generally complies with Newcastle Council's DCP 2012 with a minor surplus of 13 spaces. The applicant however is proposing Option 2 - to reduce visitor parking by approximately 65 % and re-assign these spaces to the residential apartments. This results in a proposed oversupply of residential parking in the order of some 58 spaces with the parking breakdown being 411 resident, 25 resident visitor and 287 commercial (Office & Retail) spaces – Refer Traffic Report Table 9.

The applicant attempts to justify this parking variation based on the following:

a) The additional resident parking spaces is reflective of the present market demand, and b) Council has historically reduced visitor parking associated with development in the CBD.

It is noted that the applicant has not detailed the proposed allocation (distribution) of parking spaces for the proposed residential apartments.

In response Council advises that 'market demand' in itself is not considered to be sufficient justification for the departure from Council's NDCP. Furthermore, the oversupply of resident parking does not align with the objectives of Council's Parking Plan 2021-2030, which aims to increase active and public transport use in the city centre. Council is also presently reviewing its parking rates for residential development in the CBD and early indications suggest parking rates will be further reduced to align with this strategic direction. On this basis Council does not support the a significant parking surplus of 58 parking spaces but may entertain a minor parking variation."

2.2 SLR Response

The proposed development and car parking arrangements have been amended in response to the Council RFI. Updated plans of development are included at **Appendix B**.

The proposed development uses and yields are summarised in **Table 1**. Note, the development shown in *italics* relate to the already approved and constructed 6 Stewart Avenue development which is included only because of the 'shared use' of multi-deck car parking.

Concept Masterplan Development Stage		Land Use	Yield		
C Chauset August CONCERNICEED		Retail	318sq.m		
6 Stewart Avenue - CONSTRUCTED		16,371sq.m			
30 storey mixed use – PROPOSED		510sq.m			
		2,095sq.m			
		1 bed units	66 units		
	Desidential	2 bed units	178 units		
	Residential	3+ bed units	108 units		
		Total units	<i>352</i> units		

Table 1 Proposed Development - Updated

The proposed amended post-development parking supply is summarised in Table 2.

Table 2 Proposed Development Car Parking Supply - Updated

Parking Location					
6 Stewart Avenue	Basement		38		
	Level 1	137 spaces			
	Level 2	140 spaces			
Multi-deck	Level 3	140 spaces	697 spaces		
	Level 4	140 spaces			
	Level 5	140 spaces			
Total					



2.2.1 Commercial, Retail and Residential Visitor Parking

As was documented in the original October 2021 *Traffic and Transport Assessment,* the proposed calculation method used to establish the <u>minimum</u> car parking requirement included consideration of the following:

- 1. A reduced 1 space per 75sq.m GFA rate applicable for the non-residential uses.
- 2. A ~50% reduction (1 space for the first 3 dwellings plus 1 space for every 10 dwellings thereafter) applicable to the residential visitor component.

The <u>minimum</u> car parking requirement derived using this approach is summarised in **Table 3**.

Minimum Parking Concept Masterplan **Minimum Car Parking** Land Use Yield Requirement **Development Stage Requirement Rate** (spaces) Retail 318sg.m **Constructed 6** 1 space per 75sq.m GFA 222.5 (223) **Stewart Avenue** Office 16,371sq.m Retail 510sq.m 1 space per 75sq.m GFA 34.7 (35) Office 2,095sg.m 1 bed units 0.6 spaces per dwelling 39.6 66 Proposed 30 storey 178 2 bed units 160.2 0.9 spaces per dwelling mixed used 3+ bed units 1.4 spaces per dwelling 151.2 108 Residential 1 space for the first 3 dwellings 352 Total units plus 1 space for every 10 35.9 (36) dwellings thereafter Total 645 _

 Table 3
 Proposed Development Car Parking Requirement and Allocation – Council DCP

The following sections document the technical consideration and justification for the non-residential and residential visitor parking relaxations.

- a. Site location and proximity to public and active transport facilities.
- b. Surveyed visitor parking demands.
- c. Consistency with other nearby development approval decisions.
- d. Scale of residential development and occupant car parking.
- e. Other initiatives to support a reduction in reliance on private-vehicle travel.
- f. Consistency with Council's draft (Version 5) 7.03 Traffic, Parking and Access DCP.

a) Site Location and Proximity to Alternate Travel Modes

The site is situated within the western fringes of Newcastle City Centre and is located in close proximity to an abundance of amenities and attractions including retail, commercial, entertainment and leisure, education, and other residential and short-term accommodation.





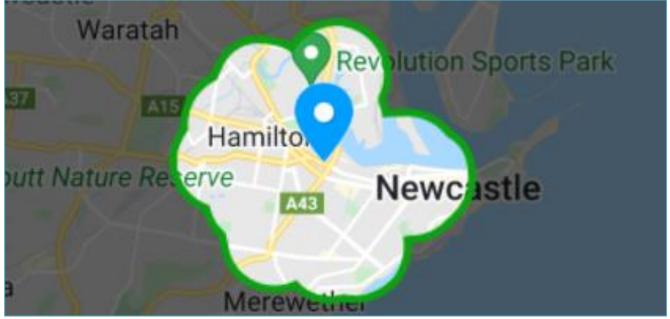
Figure 1 Site Location Summary

Some examples of such proximate active travel trips include:

- 3-4 minute walk to TAFE Hamilton Campus.
- 7 minute walk to Marketown Shopping Centre.
- 10-15 minute walk to Honeysuckle precinct..

According to walkscore.com mapping, an area approximating 1,750ha that encompasses almost the entirety of the Newcastle CBD is accessible via a 10 minute cycling journey.





Source: Walkscore.com

Furthermore, the site is located immediately adjacent the Newcastle Interchange which accommodates high frequency services comprising bus, heavy and light rail routes.

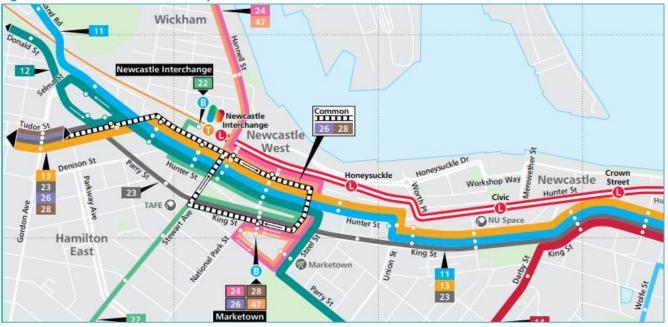


Figure 3 Newcastle Public Transport Routes

The Light Rail service has a service frequency of 7-8 minutes and 15 minutes during on and off-peak periods respectively.

The Newcastle Interchange also accommodates the Central Coast, Newcastle and Hunter heavy rail line routes. These routes collectively have frequencies ranging from 6-30 minutes and service the northern suburbs of Newcastle, and other population centres including Thornton, Maitland, Wyong, Hornsby, and Gosford. Furthermore, it is possible to connect to Sydney suburban network.

Numerous bus services either terminate or travel through the Newcastle Interchange with routes including:

- 11 Charlestown to Newcastle via Jesmond.
- 12 Maryland to Merewether Beach via Wallsend and Newcastle Interchange.
- 13 Glendale to Newcastle via Cardiff & John Hunter Hospital.
- 22 Newcastle West to Charlestown via Merewether.
- 23 Wallsend to Newcastle West via Lambton & Newcastle Interchange.
- 24 Wallsend to Marketown via Mayfield.
- 26 Wallsend to Newcastle West via Kotara & Newcastle Interchange.
- 28 Mount Hutton to Newcastle West via Broadmeadow & Newcastle Interchange.
- 47 Jesmond to Marketown via Warabrook.

Additionally, there are numerous coach services that travel through the Newcastle Interchange.

Based on this cumulative proximity and accessibility to numerous high quality sustainable transport options, some reduction in car parking for non-residential uses compared to the Council DCP is considered reasonable.



b) Surveyed Visitor Parking Demands

Residential visitor parking demand surveys were undertaken by GTA Consultants at a Hurstville site that is considered to have similar characteristics to the subject site given its proximity to a major suburban rail station and transport interchange.

The GTA findings were referenced in traffic reporting submitted to Council as part of the approved 10 Dangar Street mixed use development application. The data is comprised of multiple days of residential visitor parking occupancy observations and the findings are reproduced overleaf at Figure 4.

The GTA study determined that the peak residential visitor parking demand equated to 1 space per ~13 dwellings on weekdays and 1 space per ~10 dwellings on the weekend. These observed demands are approximately half that stipulated in the Council DCP.

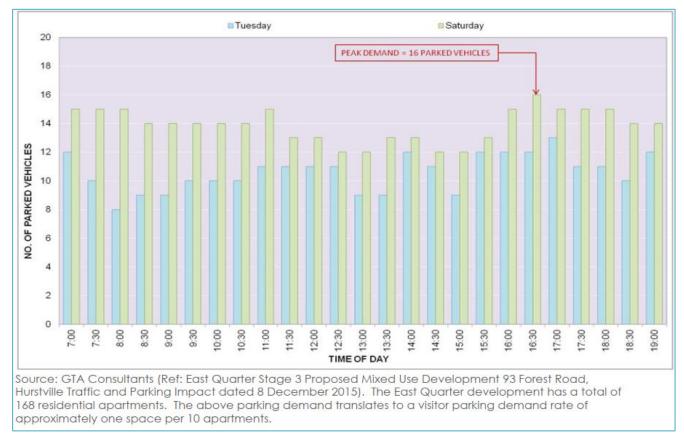


Figure 4 Residential Visitor Car Parking Occupancy Survey Findings

Based on this dataset, some reduction in residential visitor car parking compared to the Council DCP is considered reasonable. The GTA data indicates a rate of 1 space per 10 dwellings would accommodate the peak demands observed at other similarly located and accessible sites.

c) Consistency with Other Approved Development

There are precedents for parking relaxations for other mixed use development that is similarly well located and accessible by active and public transport.

A reduced 1 space per 75sq.m GFA rate for non-residential uses has been established by Council in their granting of consents for this site (DA2018/01109.01 and DA2018/01107.05) on the basis of the site's proximity to sustainable transport and other complementary land uses. The proposed development shares all of these characteristics.

A reduced 1 space per 10 dwellings rate for residential visitors has been established by Council in their granting of consent for similarly located and accessible development at 10 Dangar Street (DA2018/01197.02). In that example, the approved reduction is strictly more than 50% of the DCP requirement.

The rationale provided in support of the DA2018/01197.02 consent is applicable for this subject development, if not more so given the scale and integration of the site with the surrounding sustainable travel infrastructure.

Based on these prior development consents, the adoption of the 1 space per 75sq.m GFA for non-residential and 1 space per 10 dwellings for residential visitor is considered reasonable.

d) Scale of Development and Residential Occupant Car Parking

The large number of residential dwellings means the likelihood that more than 10% of all dwellings will have visitors at any one time is reduced compared to say a smaller development. Furthermore, in the unexpected event that all of the proposed residential spaces are occupied, the scale of development should allow some small number of these spaces to be made available for visitors.

e) Other Supporting Initiatives

Green Travel Plan

To support the proposed reduction in commercial/retail and residential visitor car parking, it would be reasonable for Council to impose a condition of consent requiring the preparation and adoption of a Green Travel Plan. Such a plan would establish targets for travel by sustainable modes and would include a 'toolkit' of strategies, objectives and direct actions.

Increased Provision for Bicycle Parking

Table 4 summarises the proposed amended development bicycle parking and end-of-trip facilities.

Land Use		Yield	Minimum Bicycle Parking Requirement (spaces)	Proposed Bicycle Parking (spaces)		
Retail (Shop)		510sq.m	2.5	45		
Commercial		2,095sq.m	10.5	45		
Residential	Occupant		352	356		
Visitor	Visitor	352 units	35	To be confirmed but > 35		
Total	-	-	405.4 (406)	=> 436		

Table 4 Bicycle Parking – DCP and Proposed



The provision for Class 2 parking for retail and commercial staff is ~350% of the minimum DCP solution and is accompanied by a similar elevated supply of end-of-trip facilities. This increased provision in tandem with the site's excellent location and accessibility should support a shift to sustainable travel and offset a proportion of the proposed reduction in commercial and residential visitor car parking.

Based on these other initiatives and their role in supporting sustainable travel, some reduction in in car parking compared to the Council DCP is considered reasonable.

f) Consistency with Draft (Version 5) DCP

On 26 April 2022, Council released a draft for comment update to the *7.03 Traffic, Parking and Access* DCP. The draft includes several revisions to Version 4 of the DCP relied upon by the subject application, but most notably proposes the following regarding non-residential parking:

- No specific parking requirement rate for commercial and retail development located in the CBD.
- No specific parking requirement, nor a minimum or maximum rate for residential visitors.

The draft DCP appears to move away from specific acceptable solution rates and instead promotes a site-specific consideration of the actual travel and parking demands. This is consistent with the approach documented herein.

2.2.2 Residential Occupant Parking

Condition 17 of the DA2018/01109 consent includes the following text.

"...with any excess parking being allocated to the residential component of the development only after the required number of parking spaces has been allocated for the commercial/retail uses."

The **Table 5** parking allocation has been determined in light of this consent condition with the 89 space surplus allocated to the residential occupant component.

				Minimum	Parking All	ocation (space	es)
Concept Masterplan Development Stage	Land Use Yield		Yield	Parking Requirement (spaces)	6 Stewart Av	Multi-deck	Total
Constructed 6	Retail		318sq.m	222 5 (222)	20	196	224
Stewart Avenue	Office		16,371sq.m	222.5 (223)	38	186	224
Proposed 30 storey	Retail		510sq.m	247(25)	0	25	35
	Office		2,095sq.m	34.7 (35)	U	35	30
		66	1 bed units	39.6	0	40	40
mixes used	Decidential	178 2 bed units		160.2	0	218	218
	Residential	108	3+ bed units	151.2	0	182	182
		352	Total units	35.9 (36)	0	36	36
Total		-		658	38	697	735

 Table 5
 Proposed Development Car Parking Requirement and Allocation – Council DCP



The following sections document the technical consideration and justification for the non-residential and residential visitor parking relaxations.

- g. Rates of residential occupant car ownership.
- h. Purchaser demographics and travel behaviours.
- i. Consistency with other nearby development approval decisions.
- j. Risks of undersupply.
- k. Subject parking supply already constructed.
- I. Consistency with Council's draft (Version 5) 7.03 Traffic, Parking and Access DCP.

g) Rates of Residential Occupant Car Ownership

SLR has interrogated 2016 census data generated using the Australian Bureau of Statistics (ABS) *TableBuilder* online portal to determine the existing vehicle ownership characteristics for residential households in the surrounding locale. The query was completed for the **Figure 5** statistical area (SA's) which was considered most relevant and homogenous with respect to the subject site.

Figure 5 ABS Statistical Areas



Table 6 summarises the average car ownership reported by ABS for apartments of more than 4 storeys in each of the statistical areas containing between one and four bedrooms.

Dwelling Yield	SA1 Zone Area	SA2 Zone Area
One Bedroom	0.97 vehicles	0.89 vehicles
Two Bedroom	1.30 vehicles	1.21 vehicles
Three Bedroom	1.67 vehicles	1.63 vehicles

Table 6 Average Household Vehicle Ownership

The **Table 6** results indicate that vehicle ownership is higher than the minimum requirement specified in Council's DCP. **Table 7** explores this dataset further and considers current vehicle ownership within the SA1 study area as it relates to dwelling size.

Dwelling Size	0 Vehicles	1 Vehicle	2 Vehicles	3+ Vehicles
One bedroom 9%		84%	7%	0%
Two bedrooms	4%	65%	27%	4%
Three bedrooms	8%	29%	50%	13%
Average	7%	59%	28%	6%

Table 7Vehicle Ownership within SA1 Study Area

Source: ABS

The following can be concluded from the ABS vehicle ownership data reported in **Tables 6 and 7**:

- For existing dwellings within the subject SA1 study area:
 - The majority of residents of one-bedroom dwellings own one vehicle or more.
 - A substantial number of residents of two- and three-bedroom dwellings own 2 or more vehicles.
 - A notable proportion of residents of two- and three-bedroom dwellings own 3 or more vehicles (4% and 13% respectably).
- The ABS average vehicle ownership rates exceed by a significant margin the average 0.997 spaces per dwelling rate that can be derived with the exact application of the Council DCP rates.

Whilst the ABS data should not be used in isolation to support a higher rate of provision compared to the minimum DCP provision, it does demonstrate that there is an already high level of demand for resident parking in the immediate study area and that multiple vehicle ownership is relatively common, even for smaller dwelling sizes, and particularly for larger dwellings where ownership of 2 or more vehicles is common. The SA1 ABS data is considered a reasonable data source for the forecasting of likely parking demands arising from the subject development.

h) Purchaser Demographics and Travel Characteristics

SLR understands that, not unlike other residential developments located in the Newcastle CBD, the proposed development will feature high-specification, boutique luxury apartments with a median price of over \$1 million. This dwelling type inherently attracts a demographic that is more likely to own more than the average number of vehicles for that dwelling type. It is also important to note that the higher number of vehicles does not necessarily always correlate to higher vehicle trip rates to and from the development as the additional parking/storage is often used for recreational vehicles which are typically used on weekends.

Through SLR's involvement in other similar developments within the Honeysuckle precinct, buyer sales survey information suggests vehicle ownership that this demographic demands an ownership rate in excess of the DCP minimum provision. Whilst this market demand data does not solely justify a higher rate of parking provision compared to the DCP rates, it does demonstrate that the vast majority of prospective and actual purchasers this specific development find multiple parking spaces highly desirable.



i) Consistency with Other Approved Development

The **Table 5** proposed parking allocation would equate to each residential unit having on average, 1.25 spaces. This average rate is still significantly less than that approved as part of other nearby consents, including several mixed use developments in the Honeysuckle precinct where average rates are in the order of 1.37-1.94 spaces per dwelling.

j) Risks of Undersupply

Again, the information above suggests that the vehicle ownership rates are skewed when compared to the DCP and there is risk that this minimum provision is not high enough to adequately cater for actual demands leading to potential overflows occurring on-street. The inadequate provision of parking that does not accommodate or respond to the forecast levels of resident vehicle ownership detailed by the ABS data and demographic estimates has the potential to lead to surplus demands shifting to on-street facilities which in turn would impact other parking user groups.

k) Subject Car Parking Already Constructed

The 697 multi-deck parking spaces discussed herein have already been constructed. Whilst their assignment to specific land uses will affect how many traffic movements are generated, the fact is that private vehicle traffic will occur regardless of how these spaces are allocated.

If commercial or retail, then there will be 1.2-5vph generated per 75sq.m or space. If residential occupant, then there will be 0.15vph generated per space. Accordingly,

I) Consistency with Council's draft (Version 5) 7.03 Traffic, Parking and Access DCP.

As noted in Section 2.2.1 (f), Council's draft (Version 5) DCP includes the following changes of note to residential parking:

- No specific parking requirement rate for residential dwellings. Instead, the following <u>maximum</u> rates are proposed:
 - 1 bedroom | maximum average of one space per dwelling.
 - 2 bedrooms | maximum average of one space per dwelling.
 - 3 bedrooms | maximum average of two spaces per dwelling.

The **Table 5** parking allocation generally accords with the above draft rates, albeit with one exception being the two bedroom average which at present is ~1.22 spaces/dwelling. It is noted that the three plus bed average (1.69 spaces/dwelling) is less than the draft DCP rate. Furthermore, the all-dwelling average (1.25 spaces/dwelling) is less than the cumulative bedroom weighted 1.31 spaces/dwelling that can be derived using the draft DCP rates.

The consistency with the draft DCP would improve further if the two bedroom maximum average rate was higher than one space/dwelling. The fact that the one and two bedroom <u>maximum</u> rates are the same should be explored in refining the draft DCP and some sort of scalar approach between one and three bedroom rates considered.



3 Council Item **3.2** – Bicycle Parking

3.1 Council RFI

"The applicant proposes to provide 356 storage cages for residents within the basement level and Level 4. The remaining 58.9 (59) spaces comprise 22 'Class 2' and 37 'Class 3' spaces. The 'Class 2' bicycle spaces and end of trip facilities (showers and change room / lockers) would appear not to be detailed on the submitted plans, while the 'Class 3' bicycle parking spaces are proposed to be located within the public plaza area adjacent to the eastern tower.

The submitted plans are to be amended to detail the location of the 'Class 2' bicycle parking and end of trip facilities."

3.2 SLR Response

Table 8 presents the bicycle parking requirements calculated in accordance with the Council DCP.

Land Use Yield		Yield	DCP Bicycle Parking Rate	Minimum Bicycle Parking Requirement (Spaces)				
				Class 1	Class 2	Class 3		
Residential			1 space per unit unless separate storage is provided	352	-	-		
	Visitor		1 per 10 units [class 3]	-	-	35.2		
Commercial		2,095sq.m	1 space per 200sq.m GFA [class 2]	-	10.5			
Retail (Shop)		510sq.m	1 space per 200sq.m GFA [50% class 2 and 50% class 3]	-	1.3	1.3		
Tot	Total		-	352	11.8 (12)	36.5 (37)		

Table 8 Minimum Bicycle Parking DCP Requirement

Table 9 summarises the bicycle parking provision shown on the amended architectural plans.

Table 9Proposed Bicycle Parking Supply

Loug	Residential Occu	pant (Class 1)	Office and Ret	tail (Class 2)	Visitors (Class 3)		
Level	West Tower	East Tower	West Tower	East Tower	Total		
Ground	-	-	25				
Level 2	39	-					
Level 3	3 39 -				Not explicitly shown;		
Level 4	75	69	-	-	however, can be readily		
Level 5	32	102	-	-	accommodated		
Level 3 39 - - - - M Level 4 75 69 - - hd Level 5 32 102 - - hd Total - - - - - -							
<u>10tal</u>	<u>356</u>	<u>i</u>	<u>45</u>				

From **Table 8 and 9**, it is clear that the proposed Class 1 and 2 bicycle parking exceeds the minimum requirement derived in accordance with the Council DCP. Most significantly, the secure Class 2 parking is ~350% of the minimum DCP solution. This provision should support sustainable travel and a shift from private vehicle travel.



The Class 3 (bicycle rack) supply is not shown on the amended plans but it is SLR's view that these facilities could be readily accommodated throughout the site at ground level at discrete legible locations consistent with regular urban environment design outcomes.

The Council DCP specifies the following end-of-trip facilities to encourage walking and cycling:

- One personal secure locker for each bicycle parking space;
- One shower cubicle, with ancillary change rooms, per 12 bicycle spaces (or part thereof over four spaces) with a minimum of one shower and change facility.

Table 10 summarises the bicycle end-of-trip facilities shown on the amended architectural plans.

	We	st Tower	East To	Tatal	
End-of-Trip Component	Male Female Male		Male	Female	Total
Lockers	28	28	-	-	48
Shower cubicle	2	2	-	-	4

 Table 10
 Proposed Bicycle End-of-Trip Facilities

The **Table 10** end-of-trip provision is consistent with the Council DCP requirement for the 45 proposed Class 2 parking spaces, although this is also 250% higher than the minimum DCP solution (18 spaces).

4 Summary and Conclusions

SLR believes that the information summarised herein is sufficient to address Council RFI matters 3.1 and 3.2.

Item 3.1 – Car parking

The amended development proposes an increased number of residential visitor parking compared to the original application. A reduction in the rate of residential visitor parking is still proposed and is considered reasonable on the basis of the site location, surveyed demands, consistency with other consents, and other sustainable travel initiatives.

The amended development proposes an increased number of residential occupant parking compared to the original application. The provision is consistent with Council's DCP which does not state a maximum provision. Additionally, the proposed rate per dwelling is still significantly less than that approved at other nearby development.

Item 3.2 – Bicycle parking

The amended development proposes bicycle parking and end-of-trip facilities that equal, and in most cases exceed that required in accordance with the Council DCP. These facilities are shown on the updated architectural plans.

The elevated supply should support the desired mode-share shift to more sustainable transport modes.

Should Council have any further queries or concerns regarding the proposed development, please do not hesitate to contact either of the undersigned.

Yours sincerely

KRIS STONE Principal Consultant – Transport Advisory



APPENDIX A

Council Information Request

REQUEST FOR ADDITIONAL INFORMATION



11 February 2022

Doma Interchange Development Pty Ltd C/- Slr Consulting Australia 2/125 Bull Street Newcastle West NSW 2302

Dear Sir/Madam

Development Application No:	DA2021/01530
Land:	Lot 11 DP 1270693 Lot 2 DP 1271240
Property Address:	854 Hunter Street Newcastle West NSW 2302
Proposed Development:	Mixed use development, including shop top housing with 365 dwellings, ground floor retail premises, commercial premises and a basement

A preliminary assessment of the above application has been undertaken. It found that the following matters are to be satisfactorily addresses prior to further assessment being carried out;

It is noted that the subject development application DA2021/01530 includes works inconsistent with aspects of the approved Staged Concept consent DA2018/01109, and as such application MA2021/00450 to modify development consent DA2018/01109 has been lodged to be assessed concurrently with the subject development application. Accordingly, the following advice is of relevance to modification application MA2021/00450 and amended documentation should be provided in support of the modification application to address the maters below as applicable.

1. Flood Management

1.1. Basement Water Entry Points

A basement level (1087m²) is proposed at floor level 0.0 m AHD and will contain 274 individual storage cages ancillary to the residential component of the development. A review of architectural floor plan DA.03.B1 indicates the potential water entry points to the basement level will be two residential elevators and two stairwells connecting to the ground floor (Level 00).

Per the recommendations of the Flood Risk Assessment ('FRA'), all potential water entry points to the basement level (except for any vehicular access) shall be set at or above the estimated PMF level of 4.2 m AHD along Hunter Street and 3.6 m AHD throughout the rest of the site.

The ground floor plan DA.03.00 is to be amended to include design finished floor levels at the proposed stairwells and residential lobbies to verify compliance with the above requirement.

All other potential water entry points into the basement level (i.e., for ventilation) are to be clearly identified on the submitted architectural plans.

1.2. PMF Levels at Hunter Street

The FRA estimates the PMF level at the development site to be 4.2 m AHD "along Hunter Street" and 3.6 m AHD "throughout the rest of the site."

The FRA, being a "high-level" assessment prepared for the concept development DA2018/01109, does not detail the extent of the PMF along Hunter Street that is expected to reach a level of 4.2 m AHD. As such, it is unclear if the basement water entry points identified in the prior section must be set at a minimum level of 3.6 m AHD or 4.2 m AHD.

The Applicant is to consult a suitably qualified flood engineer to determine the relevant PMF level affecting the proposed stairwells and residential lifts on the ground floor.

1.3. Proposed Floor Levels at Ground

Design floor levels are not provided in the ground floor plan DA.03.00 for a number of proposed utility and commercial rooms. The ground floor plan shall be amended to include finished floor levels for all utility (switch, fire pump, waste, bulky goods, stairwells, substations) and retail (R.2 at Beresford Ln) rooms.

It is noted that the floor level of retail R.3 is proposed at 3.40 m AHD which is below the adjacent Hunter Street kerb design level of 3.63 m AHD. This is not consistent with advice provided in the FRA, which recommends Hunter Street-facing retail outlets be set no lower than the street level to manage risk associated with the potential ingress of runoff and flood flows from Hunter Street.

1.4. Flood Emergency Response Plan

The development site is identified as being affected by the PMF event with a high Risk to Life classification of L4. Section 4.01 of the NDCP requires the provision of on-site refuge at or above the estimated PMF level where development is proposed in L4 zones. This refuge is to be accessible to users of the ground floor and basement areas of the development.

A draft Flood Emergency Response Plan is to be prepared by a professional engineer experienced in flood management and submitted to Council for further assessment. The draft shall include the following components:

- a) Likely flood behaviour;
- b) Flood warning systems;
- c) Education awareness program;
- d) Evacuation and evasion procedures;
- e) Evacuation routes and flood refuges; and
- f) Flood preparedness and awareness procedures for residents and visitors.

Considerations are to include the full range of flood risks, the proposed use of the site, site access constraints and local area evacuation routes to high ground. The plan is to be aimed at self-directed evacuation or evasion to minimise the draw on limited State Emergency Services resources.

Particular concern is raised with regard to the evacuation of users of the ground floor utility and retail areas. Assuming all elevators will be inoperable during an extreme flood event, flood free refuge on the first floor can only be reached from the ground floor via three stairways accessed externally from Beresford Lane. This route is not plainly evident or self-directing and will direct evacuees through Beresford Lane which, being lowest point at the development, may already be inundated as an extreme flood event develops at the site.

1.5. Model-based Flood Impact Assessment (Advisory)

In accordance with Council's senior flood engineer's assessment of concept development DA2018/01109, should the subject development application be supported a condition would be imposed on the consent requiring the submission of a model-based flood assessment detailing the off-site impacts of the proposed development. Flood modelling is to also include development carried out to date at The Store/Bus Interchange site.

This model-based flood impact assessment shall be submitted to Council for review prior to the issue of any Construction Certificate for the development DA2021/01530.

2. Stormwater Management

2.1. Outdated documentation

The submitted stormwater management plan proposes the capture of rainwater from a roof catchment area of 1,285 m² to two 10,000 L tanks for reuse at the development. It appears this stormwater management plan is based on an earlier architectural design iteration.

The submitted architectural plans propose residential tower rooftop areas with communal terrace and open mechanical plant areas around a small plant room and lift overrun. This open rooftop design replaces full-roof designs proposed in previous architectural plan iterations, greatly diminishing the available roof area for rainwater capture and reuse to approximately 300 m².

Both the MUSIC model and stormwater management plan shall be updated to reflect the current residential tower rooftop design. The stormwater management plan is to include a catchment plan identifying all unroofed hardstand, landscaping, roof, and impervious balcony/terrace areas.

2.2. Bus Interchange Carpark Landscaping

The stormwater management plan shall be amended to include stormwater management at the proposed multipurpose recreational rooftop area over the existing Bus Interchange Carpark structure. The plan must identify any existing drainage infrastructure constructed in previous stages of development.

2.3. Connection to Public Domain

Design surface levels are to be provided along the full building perimeter to confirm the level at which the building will connect to the surrounding public domain. Surface levels at the building perimeter must allow adjoining public footpath to be constructed with crossfalls directing runoff away from the development.

The proposed ground floor plan shall be amended to include these design surface levels.



3. Traffic

3.1. Car parking

A review of the parking referenced as Option 1 by the traffic consultant and acknowledging a previously accepted rate variation of 1 space per 75 GFA for commercial floor space has confirmed that the parking generally complies with Newcastle Council's DCP 2012 with a minor surplus of 13 spaces. The applicant however is proposing Option 2 - to reduce visitor parking by approximately 65 % and reassign these spaces to the residential apartments. This results in a proposed oversupply of residential parking in the order of some 58 spaces with the parking breakdown being 411 resident, 25 resident visitor and 287 commercial (Office & Retail) spaces – *Refer Traffic Report Table 9.*

Table 9 Carparking Requirement (Method 2) and Proposed Allocation

Land Use		Yield	Proposed Car Parking Supply
Retail		828sq.m	307
Office	Office		287
Residential	Occupants	255	411
	Visitors	356 units	25
Total		-	723

The allocation of a maximum 412 parking spaces to residential occupants is 58 spaces higher than that prescribed by the Council DCP. Whilst higher, the proposed arrangement is considered reasonable as it equates to an average rate of 1.15 spaces per dwelling.

The applicant attempts to justify this parking variation based on the following:

- (a) The additional resident parking spaces is reflective of the present market demand, (and)
- (b) Council has historically reduced visitor parking associated with development in the CBD.

It is noted that the applicant has not detailed the proposed allocation (distribution) of parking spaces for the proposed residential apartments.

In response Council advises that 'market demand' in itself is not considered to be sufficient justification for the departure from Council's NDCP. Furthermore, the oversupply of resident parking does not align with the objectives of Council's Parking Plan 2021-2030, which aims to increase active and public transport use in the city centre. Council is also presently reviewing its parking rates for residential development in the CBD and early indications suggest parking rates will be further reduced to align with this strategic direction. On this basis Council does not support the a significant parking surplus of 58 parking spaces but may entertain a minor parking variation.

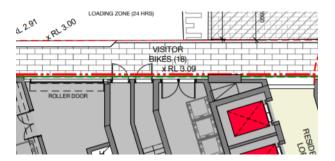
3.2. Bicycle parking

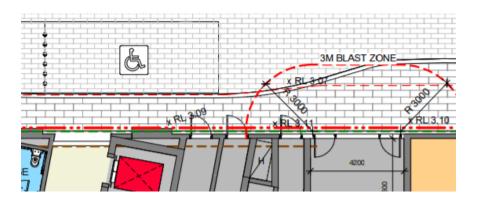
The applicant proposes to provide 356 storage cages for residents within the basement level and Level 4. The remaining 58.9 (59) spaces comprise 22 'Class 2' and 37 'Class 3' spaces. The 'Class 2' bicycle spaces and end of trip facilities (showers and change room / lockers) would appear not to be detailed on the submitted plans, while the 'Class 3' bicycle parking spaces are proposed to be located within the public plaza area adjacent to the eastern tower.

The submitted plans are to be amended to detail the location of the 'Class 2' bicycle parking and end of trip facilities.

3.3. External door openings

The architectural plans indicate doors opening outwards onto the footway area posing an obstruction for pedestrians (see screenshots below). Accordingly, the submitted plans are to be amended to ensure no encroachment/ obstruction of the footpath area.





4. Apartment Design Guide

Further information is required to enable assessment of the above mentioned application to continue with respect to SEPP65 and the provisions of the Apartment Design Guide. The following matters should be addressed;

4.1. Communal open space

The area (sqm) of communal open space should be demonstrated on the architectural drawings (to understand what areas are being included in the calculations provided in other documentation submitted in support of the development application – i.e. the ADG Compliance Schedule document).

4.2. Visual privacy

With respect to the minimum building separation distances required under part *3F Visual Privacy* of the Apartment Design Guide, the ADG Compliance Schedule document only addresses separation distances between buildings on the same site (i.e. between the two proposed towers). Whilst it is acknowledged that the location of the two tower on the site relative to the site boundaries is governed by the approved Concept DA, the minimum setbacks of the two towers from site boundaries need to be shown clearly on the plans, elevations, and section submitted in support of the development application seeking consent for the physical works. This is not only to demonstrate consistency with the approved Concept DA, but also to demonstrate compliance with the provisions of the Apartment Design Guide under SEPP65. Furthermore, the minimum separation distances between the two proposed towers need to be shown clearly on the plans, elevation and section. Whilst this information is shown in the form of diagrams and extracts within various reports submitted with the development application, it needs to be confirmed on the architectural documentation.

4.3. Solar access

It is noted that the submitted DA Design Report submitted contains a few diagrams and calculations regarding solar access to apartments. However, further detail is required which confirms exactly which apartments have been included in the calculations provided and if these calculations are correct. Furthermore, it is noted that the format of the 'solar compliance table' provided on page 55 of the DA Design Report document is unclear. CN is required to confirm that the proposal complies with the two separate calculations for compliance within *Part 4A Solar and daylight access* of the Apartment Design Guide, the first being the apartments with living rooms which achieve 2hr solar access, and the second being apartments with private open space which achieve 2hr solar access.

CN will require that amended plans are provided which detail the solar access floor plans for each proposed level containing residential apartments. The floor plan views should show the solar access to all apartment living rooms AND private open space at midwinter between 9am and 3pm. For clarity, please note that the two calculations need to be clearly demonstrated.

4.4. Apartment size and layout

The architectural drawing set and DA Design Report document contain examples of selected one, two, and three bedroom 'apartment layouts' for all *typical* apartment types. The documentation is to be amended to demonstrating compliance with the minimum internal areas and minimum room dimensions described in part *4D* Apartment size and *layout* of the Apartment Design Guide. Please note that the typical apartment layouts should identify which apartments within the proposal the layout is representing for example Tower 1 or Tower 2. Additionally, details of the apartment mix should be clearly demonstrated – this is typically provided in a table form on the architectural drawings detailing the number of each 'apartment type'.

The ADG Compliance Checklist document states "some open plan media spaces may not have a direct line of site to a window, however the apartments are considered suitably proportioned to provide sufficient light and ventilation" (page 6) – the limited 'apartment type' layouts provided do not appear to include any 'open plan media space'. The location of the 'open plan media space' and the number of apartments which it occurs needs to be clearly detailed.

Please consider that any variation is sought to the minimum Design Criteria requirements under the Apartment Design Guide, should be supported with a detailed written justification for such variations. A detailed justification is required to enable CN and the HCCPP to undertake a merit based assessment. The justification is required to identify the extent of the variation, and then demonstrate the proposed development still achieves the relevant objective under the Apartment Design Guide. It is noted that submitted documentation identifies that there is an apartment/s which have provided a habitable room depth greater than 8m. Simply stating the distance is 'slightly more than 8m' (page 6 of the ADG Compliance Schedule document) is inadequate. What is the numerical exceedance? The maximum room depth proposed in meters? How many apartments does this exceedance occur? Where are these apartments located?

4.5. Private open space and balconies

The 'apartment type' layouts requested above need to demonstrate compliance with the minimum dimensions (balcony depth) and minimum areas described in *Part 4E Private open space and balconies* of the Apartment Design Guide.

4.6. Common Circulation and Spaces

Part 4F Common Circulation and Spaces of the Apartment Design Guide limits the number of apartments sharing a single lift to 40. The proposal does not does not comply in this regard and appears to be proposing significant variations;

- 'residential tower west' three lifts servicing a total of 185 apartments means on average a single lift will service 61.6 apartments.
- 'residential tower east' three lifts servicing a total of 171 apartments means on average a single lift will service 57 apartments.

The justification for the variation provided in the ADG Compliance Checklist document states "*high speed lifts are proposed to eliminate overly long wait times for lift services*" (page 7). More detail is required in this regard –

- What is considered a 'high speed lift' and how can council have some level of certainty that this lift type will actually be used in the build?
- if 'high speed lifts' are to be relied upon as an alternative solution to achieve the relevant Objectives under this part of the Apartment Design Guide this needs to be clearly demonstrated in the design documentation. The applicant is to demonstrate the provision of such 'high speed lifts' have been considered within the proposed design (sufficient space is provided within each floor plate for the provision of such lift type, lift over run heights shown, lift pits show?)

4.7. Storage

Details of how the minimum storage volumes described in Part 4G Storage of the Apartment Design Guide are achieved for each typical 'apartment type' should also be demonstrated. If storage volume accessed from a common area (i.e. - a secure storage cage) is to be relied upon to achieve the minimum storage volumes required, this needs to be clearly nominated/ allocated on the plans (to ensure storage cages are associated to the apartments which do not achieve the minimum storage volumes within the apartment alone.)

5. Urban Design Review Panel recommendations

The development application was review by the Urban Design Review Panel at the meeting held Thursday 25 November 2021 and written advise provided (UDRP Report). A written response to the issues and recommendations contained in the UDRP Report needs to be provided.

6. Operational Waste Management Plan

A referral to Councils Wastes Services has been completed, and the following comments provided;

- It is confirmed that volumes used in residential waste and comingled recycling estimations are in line with CN's guidelines.
- The applicant should note that compaction of 2:1 is suggested this could potentially damage CN bins. CN shall not bear cost of replacing bins damaged by over-compaction of waste.
- It is further noted that recycling has been calculated at a twice-weekly service frequency CN provides comingled recycling collection to MUD residential dwellings under the DWMSC a maximum of weekly.
- The proposed number of comingled recycling bins is to be reviewed in line with the fact that recycling has been calculated at a twice-weekly service frequency CN provides comingled recycling collection to MUD residential dwellings under the DWMSC a maximum of weekly (their number of comingled recycling bins shall essentially need to double).
- Access to the bin presentation area needs be via a PIN pad or similar; CN does not accept access via key/s, swipe card, etc.
- The collection methodology is acceptable.

The Commercial / Retail section estimated waste generation volumes, bin numbers and collection methodology appears to be consistent with CN's guidelines assuming that the applicants have consulted with a commercial waste provider and they have verified their proposed collection methodology. CN will require a letter from a commercial provider confirming that the proposal is capable of being catered for.

The applicant is to amend and resubmit their OWMP.

7. Documentation

In addition to the above matters, the following items anomalies within the submitted documentation where identified during the preliminary assessment;

7.1. Site area

The documentation submitted with the development application contains conflicting information regarding the site area;

• Page 17 of submitted SEE states "The site has a total land area of approximately 8,743m2."

- Architectural Drawings shows a total site area of 12050sqm (Drawing DA.01.02)
- Landscape drawings indicate the larger site footprint (consistent with the architectural drawings)
- DA Design Report document uses the larger site footprint (consistent with the architectural drawings)

7.2. Level 05 of 'residential tower east'

The nature of the space directly east of the 'lobby/lounge' is unclear. Is this an outdoor area accessible from the lobby/ lounge? Or is this a void to Beresford Lane below? (i.e. there is no 'floor proposed in this area?)

7.3. Communal rooftop terrace areas

The two communal rooftop terrace areas are omitted from the landscaping documentation.

Please note this is a preliminary advise only and further information may be required after further assessments and briefings with the Regional Planning Panel have been conducted.

Any documents submitted to CN are to be in a pdf format, named in accordance with <u>CN's</u> <u>Plan Standards</u>, and returned via either the NSW Planning Portal (if lodged in the Portal).

You are advised that:

- If the required information is not be submitted by **close of business Friday 4th March 2022**, being 21 days of the date of this letter, the application will be determined based on the information provided to date. This may result in the refusal of the application.
- Amendments or variations to the development, must include the particulars sufficient to indicate the nature of the changed development and may incur additional assessment and notification fees.
- New Development Contributions Plans were endorsed on 26 October 2021. The Plans will commence on 1 January 2022 and will replace the current Section 7.12 Contributions Plan, noting that there are no changes to the Western Corridor Section 7.11 Contributions Plan. Please refer to new Section 7.11 Development Contributions Plan and new Section 7.12 Development Contributions Plan and the fact sheet, which includes responses to frequently asked questions, to understand what this means for development.

If you have any questions, please contact me at HHUTCHENS@NCC.NSW.GOV.AU or on 4974 2746.

Yours faithfully

Holly Hutchens SENIOR DEVELOPMENT OFFICER

ATTACHMENT B

Plans of Development (Bates Smart)

THE STORE - 854 HUNTER STREET NEWCASTLE AREA SCHEDULE (20.04.22) Job No: S12133 Total Site Summary Site area Allowable FSR Total Site Allowable GFA Existing GFA (DA approved - 6 Stewart Ave) Existing GFA (NBI amenities) GFA Surplus Parking Proposal (Mixed-use site) 6 Stewart Ave 12,050 sqm 4.89 :1 58,938 sqm 16,689 sqm 120 sqm 1,164 sqm Remaining allowable GFA Proposed FSR Total proposed GFA GFA Mix Total Residential GFA Total Commercial GFA Total Retail GFA 43,533 sqm 4.88 :1 58,754 sqm 38,176 sqm 2,095 sqm 510 sqm 38,176 sqm 18,466 sqm 828 sqm Residential GFA Commercial GFA Retail GFA 16,371 sqm 318 sqm Commercial GFA Retail GFA mmercial site GFA . **16,689** sqm Mixed -use site GFA 40,781 sqm Total 181 171 **352** Apts Apt mix Total Apartments West Total Apartments East
 2B
 3B

 24%
 82
 45%
 50

 13%
 96
 56%
 50
 1B 44 22 66 29 352 Total 19% 178 51% 100 28% 8 2% Total apts

	Sub	-total						R	esidential				Comm	ercial	Ret	tail
LEVEL	USE	RL(m)	Height	FFL (m)	GEA	GBA (excl Balc)	GFA (Proposed)	NSA (Proposed)		Apartment Mix			GFA (Comm)	NLA (Comm)	GFA (Retail)	(
						<u> </u>			1B	2B	3B	4B/Penthouse			()	`
													1			
													1			
ROOF		102.35														
L28	Plant	98.43	3.92	98.43		623	26						ł			
L27	Residential	95.23	3.20	95.23	1075	626	588	511		1	0	2	l			
L26	Residential	92.03	3.20	92.03	1075	680	634	548		1	4		1			
L25	Residential	88.83	3.20	88.83	1075	718	692	595		1	2	2	l			
L24	Residential	85.63	3.20	85.63	1075	764	733	631		3	2	1	l			
L23	Residential	82.43	3.20	82.43	1075	800	781	673	0	4	3		l			
L22	Residential	79.23	3.20	79.23	1075	956	821	708	1	4	3		l			
L21	Residential	76.13	3.10	76.13	1075	956	821	708	1	4	3		l			
L20	Residential	73.03	3.10	73.03	1075	956	821	708	1	4	3		l			
L19 HR floorplate	Residential	69.93	3.10	69.93	1075	956	821	708	1	4	3		1			
L18 LR floorplate	Residential	66.83	3.10	66.83	1075	956	820	706	3	4	2		l			
L17	Residential	63.73	3.10	63.73	1075	956	820	706	3	4	2		l			
L16	Residential	60.63	3.10	60.63	1075	956	820	706	3	4	2		l			
L15	Residential	57.53	3.10	57.53	1075	956	820	706	3	4	2		l			
L14 L13	Residential	54.43	3.10	54.43 51.33	1075	956 956	820 820	706 706	3	4	2		l			
L13 L12	Residential Residential	51.33 48.23	3.10 3.10	48.23	1075 1075	956 956	820	706	3	4	2		l			
L12 L11	Residential	46.23	3.10	45.13	1075	956 956	820	706	3	4	2		l			
L10	Residential	42.03	3.10	42.03	1075	936 918	820	706	3	4	2		l			
L10 L9	Residential	38.93	3.10	38.93	1075	924	820	706	3	4	2		l			
L8	Residential	35.83	3.10	35.83	1075	924	820	706	3	4	2		1			
L7	Residential	32.73	3.10	32.73	1075	924	820	706	3	4	2		1			
L6	Residential	29.63	3.10	29.63	1096	924	820	706	3	4	2		l			
L5M	Storage	26.6	3.03	26.6			226						l			
L5	Resi / Recreation	23.5	6.13	23.5	1096	924	678	471	1	4	1		1			
L4	Plant / Storage	19.4	4.1	19.4	400	400	311									
L3	Residential Communal	15.7	3.7	15.7	878	874	1261						L			
L2	Office	12	3.7	12	878	874	136						1077	1006		
L1	Office	8.3	3.7	8.3	878	814							987	914		
G	Lobby / Retail	3.8	4.5	3.8	878	874	155						31		510)
B1	Plant / Storage	3.0	3.80	0									l			
									24.3%	45.3%	27.6%	2.8%	1			
TOTAL					28,679	25,057	20,165	15,439	24.3%	82	50	2.8%	2,095	1,920	510)

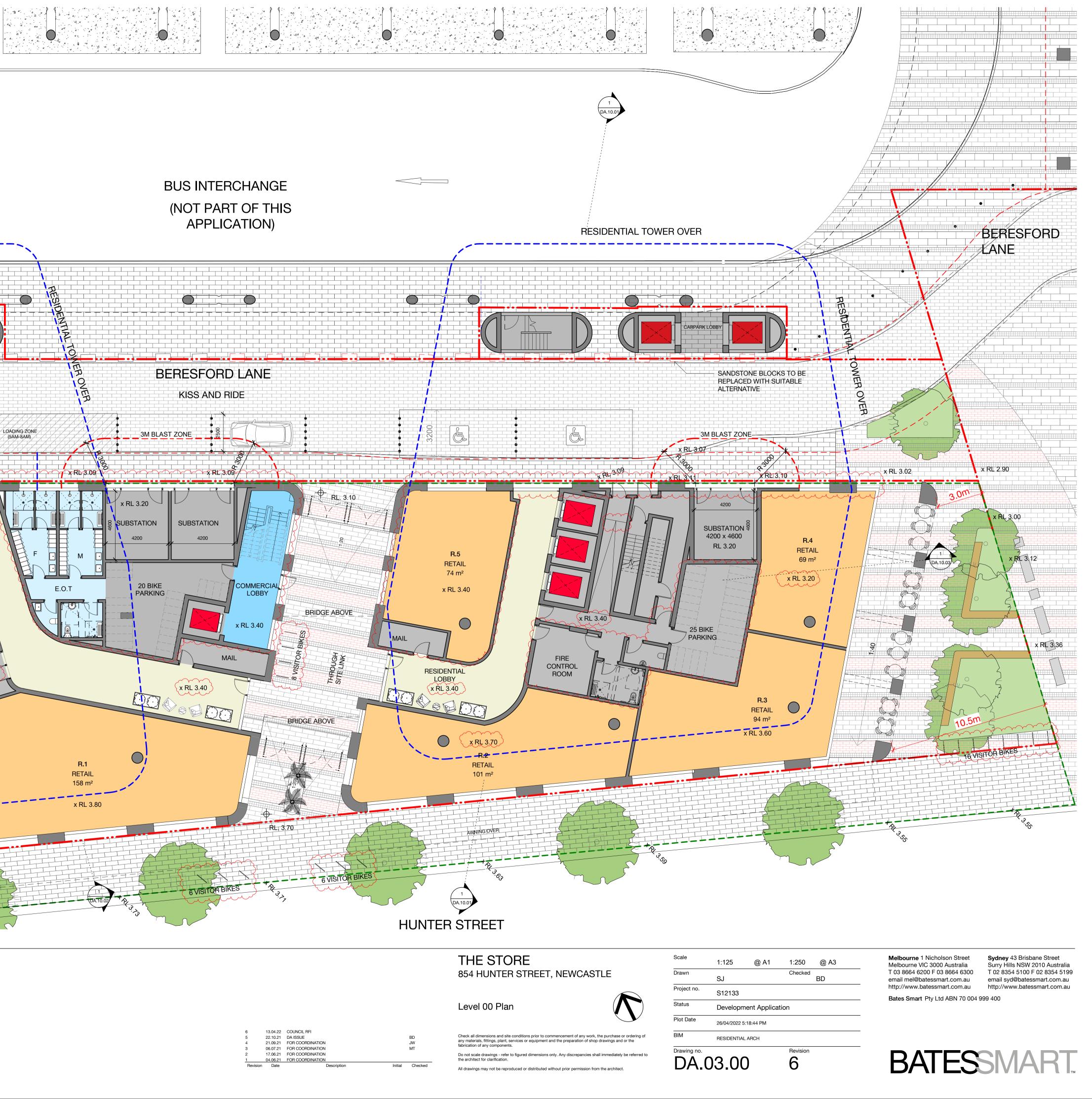
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28%	5 3	3%
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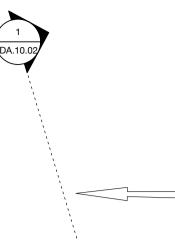
THE STORE - 854 HUNTER STREET NEWCASTLE AREA SCHEDULE

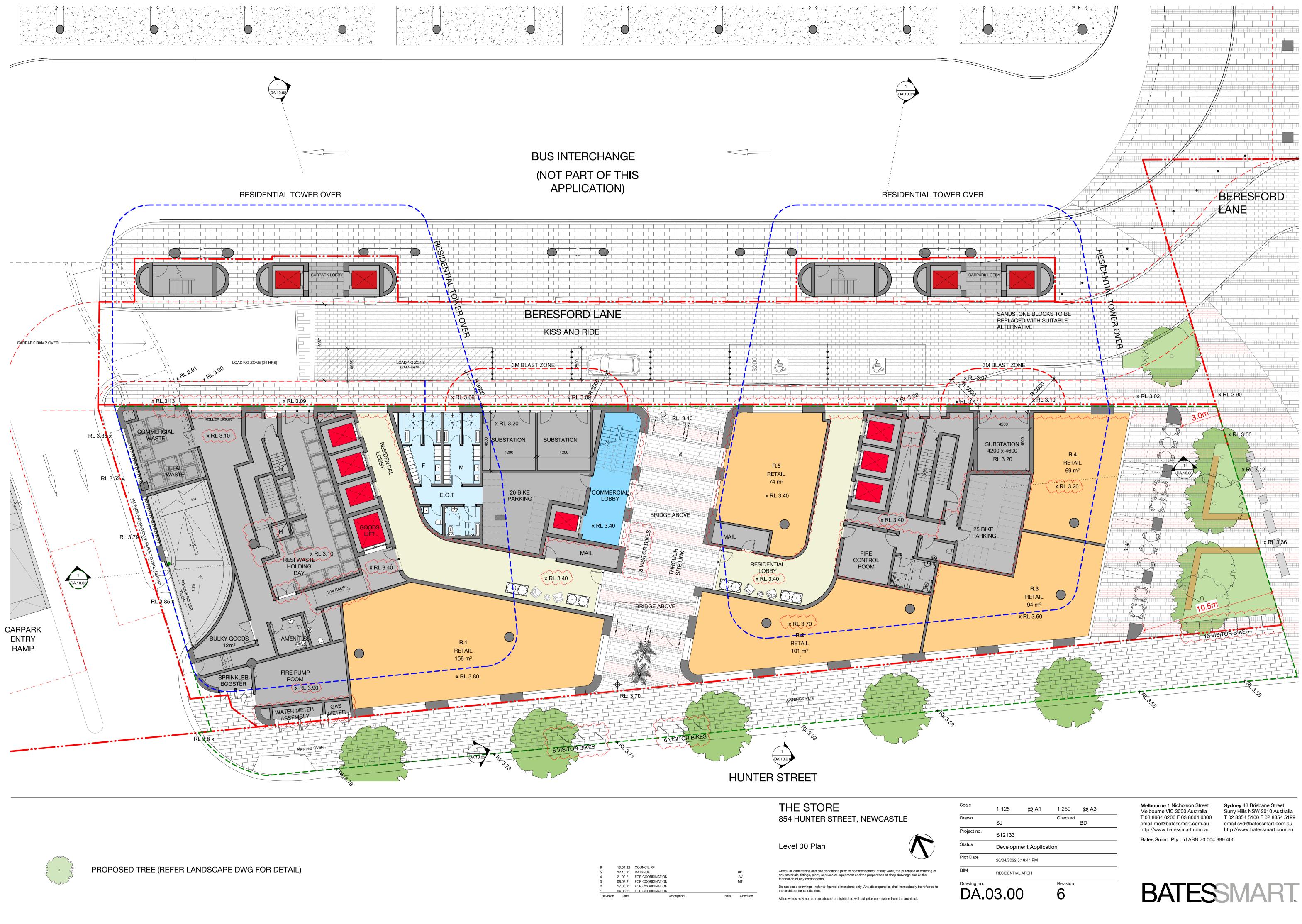
Job No: S12133

RESIDENTIAL (R2 - EAST)													1		1	
	S	ub-total					I	R	esidential				Comm	nercial	Re	tail
LEVEL	USE	RL(m)	Height	FFL (m)	GEA	GBA (excl Balc)	GFA (Proposed)	NSA (Proposed)		Apa	rtment Mix		GFA (Comm)	NLA (Comm)	GFA (Retail)	GLAR (Retail)
ROOF		110.63		110.63			(,	(,	1B	2B	3B	4B/Penthouse	(/	(/	())	()
												,				
L30	Plant	104.63	6	104.63	602	503	26									
L29	Residential	101.43	3.20	101.43	916	549	487	437				2				
L28	Residential	98.23	3.20	98.23	916	573	532	467	0	0	4	0				
L27	Residential	95.03	3.20	95.03	916	642	582	514	1	0	4	0				
L26	Residential	91.83	3.20	91.83	916	677	643	565	0	3	3	0				
L25	Residential	88.63	3.20	88.63	916	725	696	610	0	3	2	1				
L24	Residential	85.43	3.20	85.43	916	823	721	638	0	4	3					
L23	Residential	82.33	3.10	82.33	916	823	721	638	0	4	3					
L22	Residential	79.23	3.10	79.23	916	823	721	637	0	4	3					
L21	Residential	76.13	3.10	76.13	916	823	721	637	0	4	3					
L20	Residential	73.03	3.10	73.03	916	823	721	637	0	4	3					
L19	Residential	69.93	3.10	69.93	916	823	721	637	0	4	3					
L18	Residential	66.83	3.10	66.83	916	823	721	637	0	4	3					
L17	Residential	63.73	3.10	63.73	916	823	721	637	0	4	3					
L16 HR floorplate	Residential	60.63	3.10	60.63	916	823	721	637	0	4	3					
L15 LR floorplate	Residential	57.53	3.10	57.53	916	823	725	639	2	5	1					
L14	Residential	54.43	3.10	54.43	916	823	725	639	2	5	1					
L13	Residential	51.33	3.10	51.33	916	823	725	639	2	5	1					
L12	Residential	48.23	3.10	48.23	916	823	725	639	2	5	1					
L11	Residential	45.13	3.10	45.13	916	823	725	639	2	5	1					
L10	Residential	42.03	3.10	42.03	916	823	725	639	2	5	1					
L9	Residential	38.93	3.10	38.93	916	823	725	639	2	5	1					
L8	Residential	35.83	3.10	35.83	916	823	725	639	2	5	1					
L7	Residential	32.73	3.10	32.73	916	823	725	639	2	5	1					
L6	Residential	29.63	3.10	29.63	916	823	725	639	2	5	1					
L5M	Storage	26.6	3.03	26.6			350									
L5	Resi + Recreation	23.50	6.13	23.5	916	823	603	397	1	4	0					
L4	Plant / Storage	19.4	4.1	19.4	350	350	281									
L3	Office	15.7	3.7	15.7	739	735										
L2	Office	12	3.7	12	739	735										
L1	Office	8.3	3.7	8.3	739	735										
G	Lobby / Retail	3.8	4.5	3.8	689	689	72									
B1	Plant / Storage	3.0	3.80	0	***************************************											
01	- Hunt / Storage	5.0	5.00	•												
									13%	56%	29%	2%				
TOTAL				110.63	26,758	23,373	18,011	15,115	22	96	50	3	0	0	0	0

Total apts 171

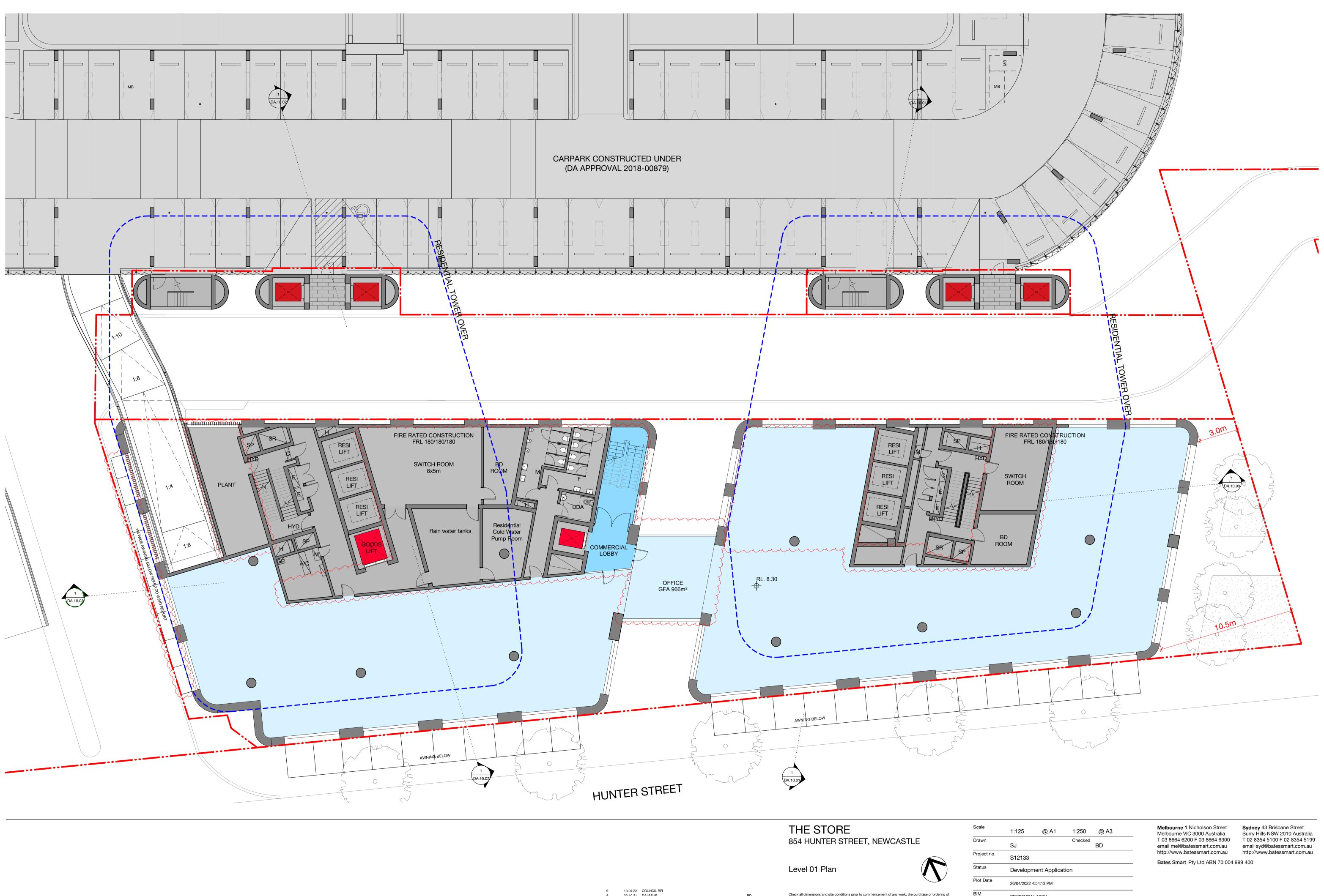








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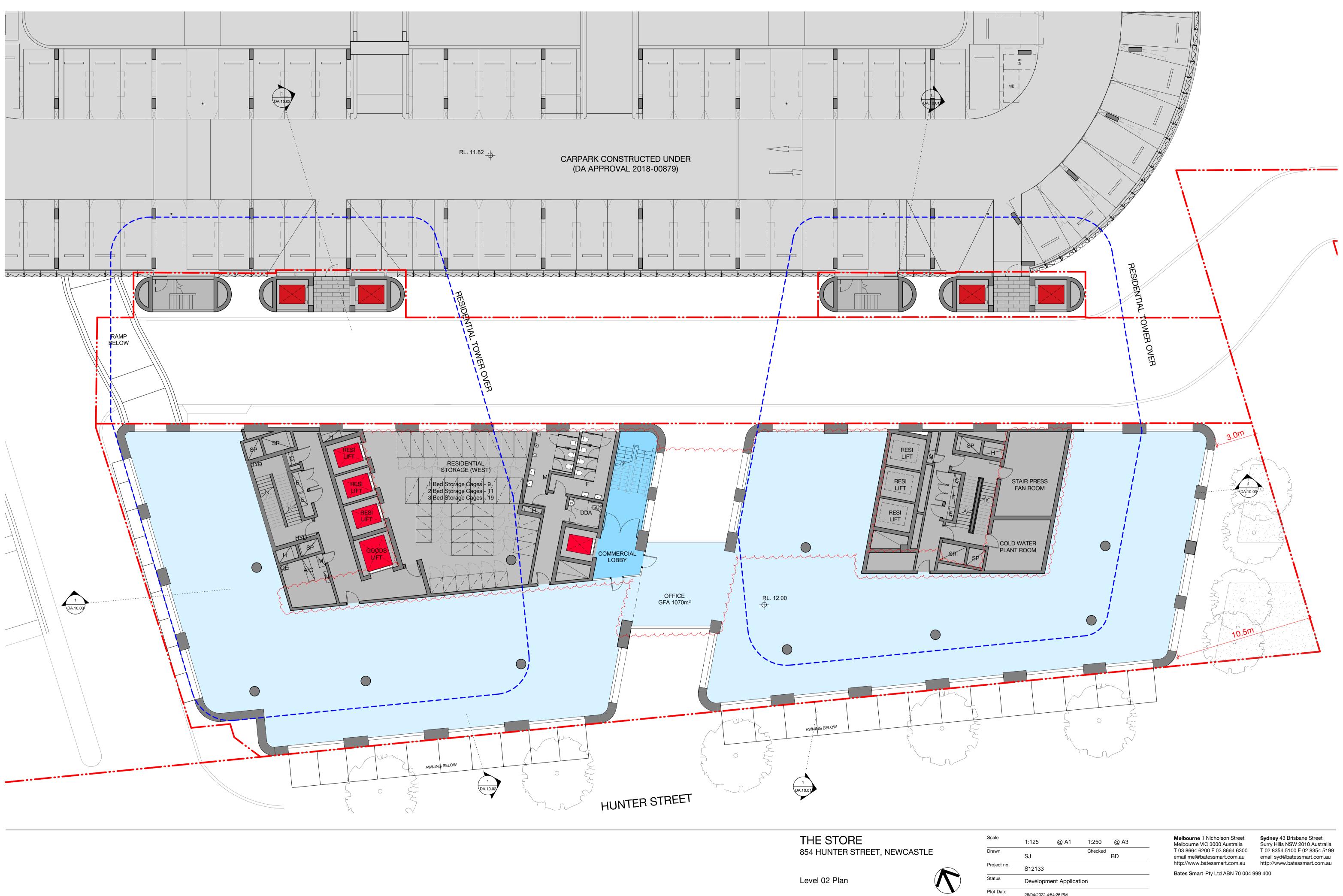
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	17.06.21	FOR COORDINATION		
	06.07.21	FOR COORDINATION		MT
	21.09.21	FOR COORDINATION		JW
i	22.10.21	DA ISSUE		BD
;	13.04.22	COUNCIL RFI		

Check all dimensions and site conditions prior to commencement of any work, the purchase or ordering of any materials, fittings, plant, services or equipment and the preparation of shop drawings and or the fabrication of any components. Do not scale drawings - refer to figured dimensions only. Any discrepancies shall immediately be referred to the architect for clarification. All drawings may not be reproduced or distributed without prior permission from the architect.



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Revision	Date	Description	Initial	Checked

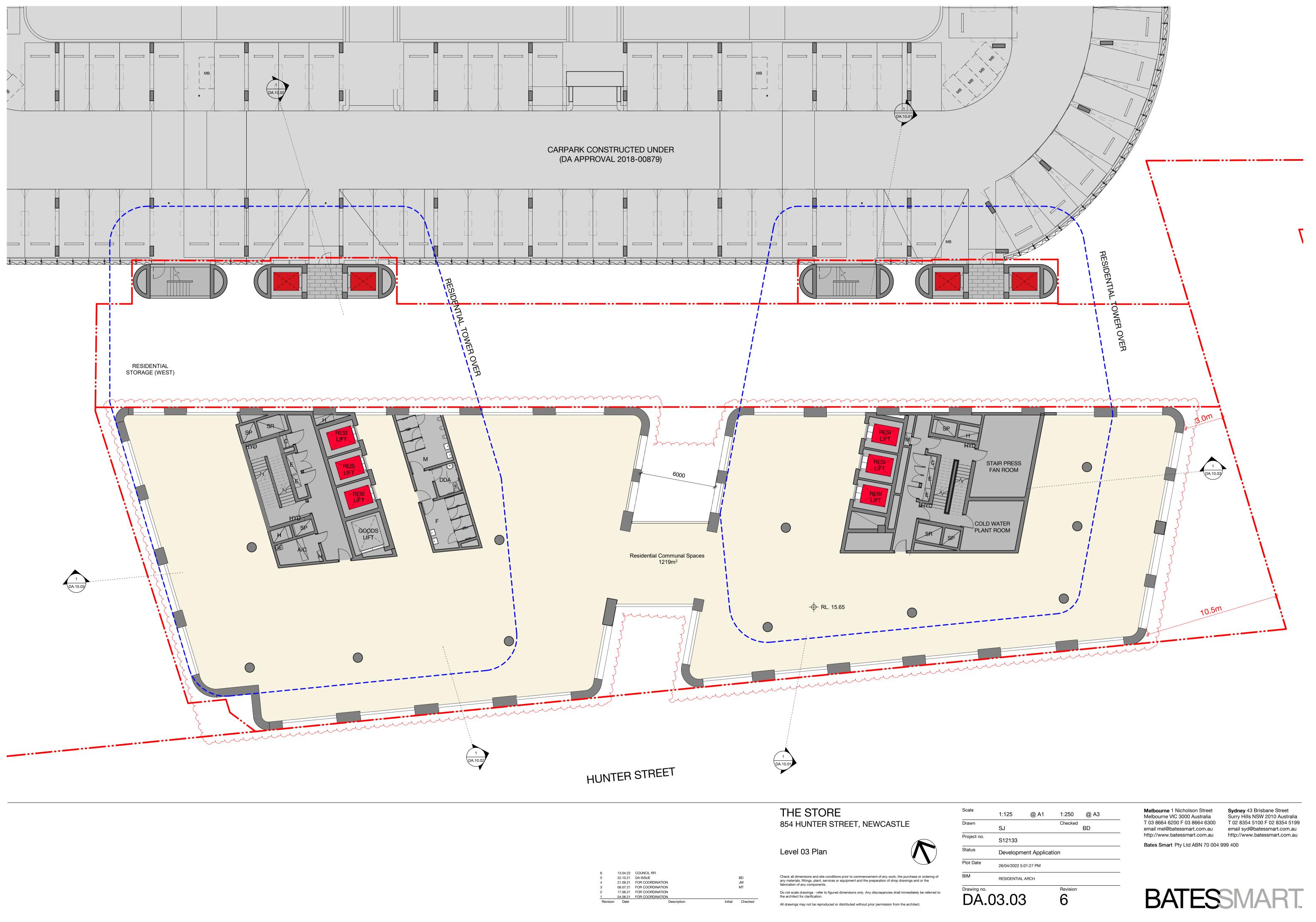
Check all dimensions and site conditions prior to commencement of any work, the purchase or ordering of any materials, fittings, plant, services or equipment and the preparation of shop drawings and or the fabrication of any components. Do not scale drawings - refer to figured dimensions only. Any discrepancies shall immediately be referred to the architect for clarification. All drawings may not be reproduced or distributed without prior permission from the architect.

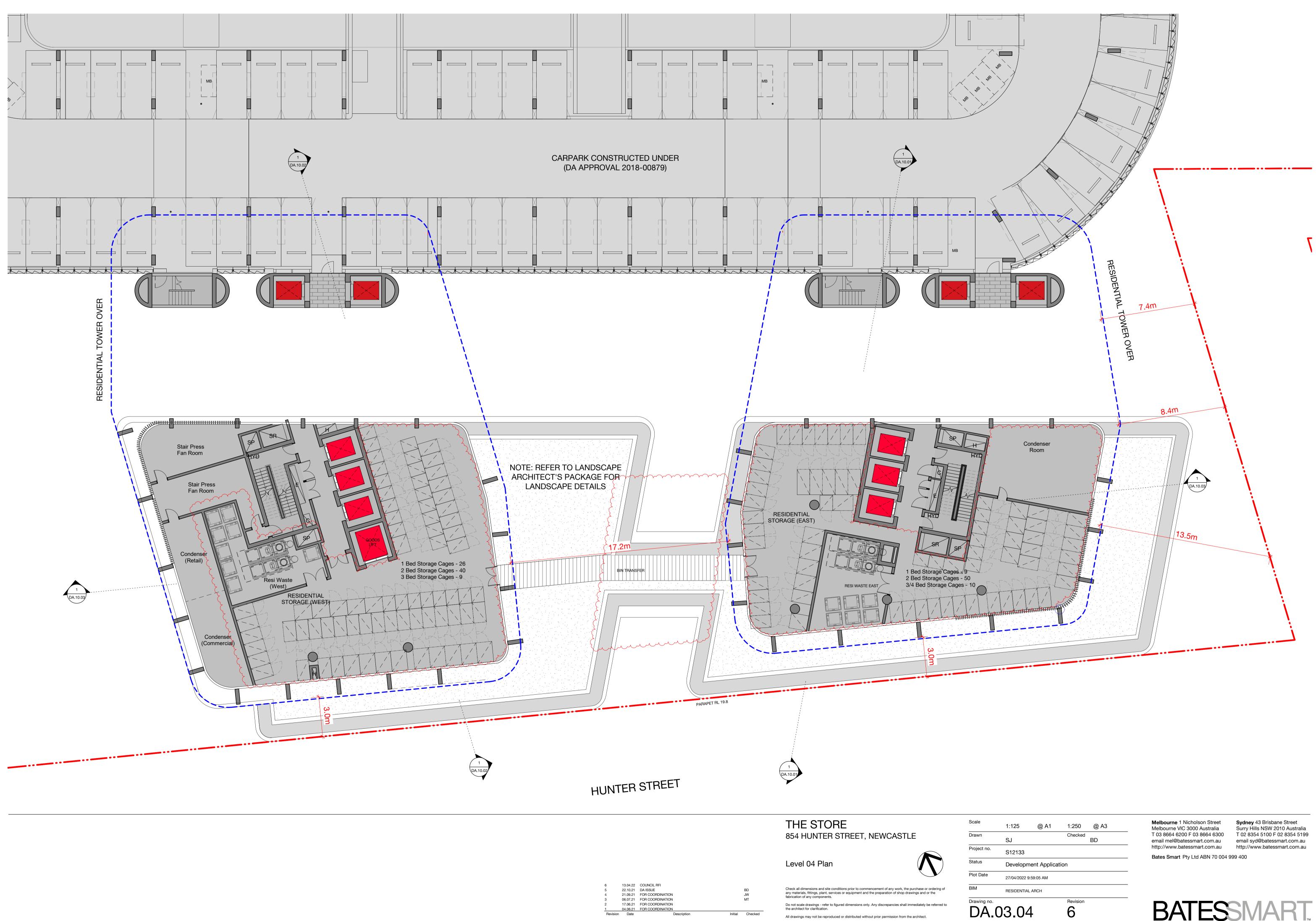


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