

Tweed Mall – Design Review Panel 01 - Alignment with Concept DA

	Design Review Panel 01 Advice	Concept DA SPUD Comment Post RFI (May 2024)
	Structure Planning	
1	Develop a stronger emphasis on using public domain and connectivity as the key organisational strategies for the site's structural planning including opportunity for a greater diversity of ground plane public domain experiences and scales of public domain space.	<p>Conditional in the context of the proposed Concept DA.</p> <p>Urban Design report illustrates a series of 'key opportunity' and 'key move' strategies relating to the sites structure planning including public domain areas, connectivity and identified built form envelopes. The public domain and landscape elements are included within the urban design report (Section 08-34) and includes reference to the following key public domain and connectivity outcomes:</p> <p>Green heart – large central public open space area with series of landscape opportunities and central stair well with architecturally defining canopy structure.</p> <p>Blue Green Street (North South Street) – Internal north-south single direction shared street / pedestrian street which links Florence St in the south to Bay Street in the north and intersects with the Green Heart public domain area.</p> <p>Rainforest Room – Opportunity for denser urban forest planting which combined with 'water storey' to tie to the indigenous culture of the site.</p> <p>Bay Street Frontage – Series of smaller scale active land use tenancies front and engage with the Bay St Road Reserve through opportunities for outdoor dining and landscaping.</p> <p>East-West – Series of east west connections from Wharf Street linking with the Blue Green Street and Green heart.</p> <p>It is noted that the current public domain and open space totals are based on the reference design and include all space outside of building envelopes including connections, corridors space around buildings at the podium level and above. As such these areas are likely to be modified in the context of future more detailed designs.</p> <p>The overall proportions represent an increase from the initial scheme as presented as DRP 01 & 02. The Concept DA public domain / landscape elements as set out within the Urban Design Guide and includes:</p>

		<ul style="list-style-type: none"> • Total of 19 700sqm of landscaped area of the 50 003sqm site area consisting of: <ul style="list-style-type: none"> ○ 3 185sqm (16%) +6m width DSZ ○ 960sqm (4.8%) -6m width DSZ ○ 810sqm (4%) - Open space with 1.5m structural set-down zone ○ 810sqm (4%) - Open space with 1.0m structural set-down zone • GL - 9 840sqm of open space with public access. • GL - 3 340sqm of public access until midnight. • GL - 2 750sqm Public arcade with 24hr access. • PL - 540sqm communal open space. • PL - 5 765sqm Public access until midnight. • PL - 2730sqm Indicative canopy cover. • PL - 850sqm Indicative planted awning • PL - 9100sqm Softscape • PL - 7 300sqm Hardscape • L2 - 6 700sqm communal open space. • L2 - 3725sqm public access until midnight. • Roof – 9 215sqm Communal Open space <p>Previous Recommendations:</p> <ul style="list-style-type: none"> - <i>To provide a better understanding of the deep soil zone and open space, a schedule of what would be deemed ‘public open space’ versus ‘private open space’ would be beneficial. It would also be beneficial to understand which parts of the site would be open 24/7 and which parts would typically be shut down at the end of business trading.</i> - Updated Comment: The Urban Design Report (Sect 12, 16 and 17) now documents areas which are accessible 24/7 and areas which have more restricted access. - <i>Inclusion of upper-level public domain areas, which would have great water view vantages, available for the publics use.</i> - Updated comment: The Urban Design report (Sec 19) now indicated 9 215sqm of communal open space on the roof top of Building J. - <i>Inclusion or demonstration of how public domain spaces can be used for pop-up events or public entertainment / performances.</i>
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		<ul style="list-style-type: none"> - <i>Consider the inclusion of all roof spaces for future resident's use. These spaces would offer unique views as well as great access to natural light and cooling breezes. In the residential context these roof spaces would be well utilised for an array of communal uses including BBQ areas, garden spaces (veggies), kids playground areas, communal tool shed and maker spaces, pet spaces.</i> - Updated Comment: <i>This level of detail is not necessary for the purposes of a concept DA and more relevant in the context of subsequent and more detailed stage and/or building development applications when specifics of land use and building design are known.</i> - <i>It is important to understand the relation between the public domain spaces including 'green heart' and overshadowing from surrounding buildings. During winter months especially it is noted that some of these spaces would receive minimal natural sunlight during core retail hours. This warrants further analysis and justification round the intended use of these spaces and ability of landscape to grow with reduced sunlight access.</i> - Updated Comment: <i>The reference design architectural drawing set includes solar access diagrams during the equinox, summer and winter solstice at three-hour intervals (see A-DA-404 Solar Access by Hour) based on the reference design scheme. The varied building form across the site will inevitably result in overshadowing of public domain areas at various times of the day and year. The north-south alignment of the main pedestrian spaces will receive solar access in the middle of the day in the middle of winter. Elevated communal open spaces on roof tops (such as Building J) also ensure that there is always an element of natural sunlight access during winter months. Conversely, the building form, including double volume canopy structure will provide much needed shade during summer months. Individual sunlight access diagrams will be required for each building approval demonstrating compliance with the ADG requirements for the residential components of those buildings.</i> - Suggested Condition: <i>Impose a condition requiring the inclusion of a ground floor envelope plan with dimensions that depicts in particular building separation, pedestrian and public domain spaces. The current plan depicts a roof down envelope plan which provides less certainty of the balance between built form and public domain spaces on the ground plane. This should depict a minimum 15m separation distance between Building A and Building B at the ground level which would include combined pedestrian access and laneway and 15m between Building A and Building C acknowledging this as a primary</i>
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		<p><i>pedestrian point of access from the car park and public transport fronting Wharf St.</i></p>
2	<p>There is opportunity to more fully understand the site's relationship to the surrounding urban context. Undertake a 'tissue' or urban design analysis of the broader precinct to better understand surrounding and interface land uses and built form (existing and future potential), key connections (pedestrian and vehicular) and network of public domain and open space.</p>	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The Key opportunity diagrams which form part of the Urban Design Report provide a city-wide context which has informed the structure plan of the site. This broader contextual consideration has informed the sites structure plan in the following ways:</p> <ul style="list-style-type: none"> • Extension of external street network (Empire Lane in an east-west direction; pedestrian link from McGregor Crescent in a north-south direction) as pedestrian pathway desire lines across the site. • North-south pedestrian pathway which would line up with linkages through significant open space area of Jack Evans Boat Harbour. • Intent to activate the main street frontages of Wharf Street and Bay Street. • Location of loading and service circulation to the eastern edge of the site away from public domain areas. <p>While the DRP recommended a more direct pathway into the site from the Wharf and Bay Street intersection, the submitted reference design indicated food and beverage uses on that corner interface which will activate that edge. Notwithstanding, as a pedestrian approaching the site from the north, there will still be an approximate 50m walk from that corner to either the east or south to meet up with a point access into the site.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - <i>Refer comments in item 3 below regarding desire lines approaching the site from the northern key intersection.</i> - <i>Opportunity to facilitate better pedestrian scale with finer grain retail units fronting key street interfaces including the Wharf St car park (western edge) and up towards the Wharf / Bay Street intersection.</i> - Updated comment: Refer to Item 3 below.
3	<p>Identify desire line movements through the site to inform the site's structure planning.</p>	<p>Conditionally satisfied in the context of the proposed Concept DA.</p> <p>The Urban Design Guidelines includes reference to site lines (Section 11) and supporting documentation (UD report and reference design) now more fully considers the broader city context in terms of pedestrian pathway desire lines through the site which includes Empire Lane in an east-west direction; Powell Street in a north-south</p>

		<p>direction. The master plan includes multiple points of access from surrounding streets and creates a gridded network of north-south and east west pedestrian links within the site which centres around the green heart and fresh food markets.</p> <p>However, the building form/ground floor on the corner of Bay and Wharf Street intersection limits ease of site access from the north direction where substantial pedestrian traffic is anticipated. To access the internal core of the site from this direction would require walking down either Wharf or Bay St approximately 50m. Similarly shopping centre floor space on the ground floor of Building A, will likely have blank walled elevations, further reduces pedestrian porosity into the site from this key intersection. A more direct access from this intersection and or the ground floor uses which would have an engaging and active frontage into the site would be preferable.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - <i>More directly accommodate pedestrian access from the main CBD intersection of Wharf and Bay Street into the site. This could be a combination of a diagonal or more direct route from the intersection and a widening of the north-south street adjoining JEBH. A line of sight in the location would also visually connect the Bay/Wharf St with the public domain areas including greenheart areas internal to the site.</i> - Updated Comment: <i>The suggestion to include a more direct path of travel into the site from the Wharf and Bay St intersection has not been included. However, the reference design does indicate that this edge would be activated by food and beverage uses which is appropriate give its central CBD location which is generally supported.</i> - Suggested Condition: <i>Impose a condition requiring the inclusion of a ground floor envelope plan with dimensions that depicts in particular building separation, pedestrian and public domain spaces. The current plan depicts a roof down envelope plan which provides less certainty of the balance between built form and public domain spaces on the ground plane. This should depict a minimum 15m separation distance between Building A and Building B at the ground level which would include combined pedestrian access and laneway and 15m between Building A and Building C acknowledging this as a primary pedestrian point of access from the car park and public transport fronting Wharf St.</i> - <i>Impose a condition requiring the inclusion of an 'active frontages' section within the UDG which depicts the primary and secondary frontages of building edges fronting public domain areas. This should correlate to and guide land</i>
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use outcomes which will be pursued as part of future and more building specific development applications.



Image: Advice for a more direct pedestrian desire line access from the north direction and main CBD intersection hasn't been included. The main corner fronting Bay and Wharf St intersection will instead be activated by food and beverage uses and a wider pedestrian point of access off Bay St.

- 4 Explore a hierarchy of pedestrianised connections and/or public streets (laneways) to break down the overall scale of the site into more discrete development blocks. These blocks could have more of a public interface and thereby greater level of surveillance to the benefit of character, amenity, and hierarchy of public domain. This may also inform an urban structure that more safely and securely facilitates day/night functions across the site.

Conditionally satisfied in the context of the proposed Concept DA.

The site reference design now includes a hierarchy of predominantly north-south and east-west pedestrian links which confluences around the green heart public domain area which are reflected within the envelope plans, urban design guidelines and reference design.

These linkages create the structure of the site which includes three building envelopes to Bay Street, three building envelopes to Wharf Street, a central lower retail core area which adjoins the fine grain fresh food market and green heart public domain area. The larger floor plate supermarket tenancies are arranged in the sites south-eastern corner with residential buildings above.


This reference design thereby encourages a strong degree of porosity across the site and balance of retail, commercial, food and beverage and lifestyle use to activate

		<p>street edges and public interfaces within the site. The integration of residential uses to the upper level will facilitate an onsite residential population to support these land uses and facilitates informal surveillance over the public spaces. It is however unknown operationally what parts of the site remain permanently open for cross access and what parts of the site may be shut during nighttime hours.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - <i>The hierarchy of pedestrian connections and resultant building envelopes as reflected within the reference design are generally supported.</i> - Updated comment: Refer UDG Section 01 Site Permeability. - <i>Refer to item 2 regarding matching fine grain retail uses with key public interfaces.</i> - Updated comment: Refer UDG Section 02 Wayfinding & Building Entries. - Suggested Condition: <i>As per comments and recommended conditions outlined in item 3 above, an additional section within the UDG should be included indicating location of active and engaging edges to each of the building envelopes which will guide future land uses in these locations.</i> - <i>Refer Item 3 relating to desire lines, legibility, and travel distance to 'enter the site' from the main CBD intersection of Wharf and Bay Street.</i> - Updated comment: Refer UDG Section 11 Site lines. - <i>Refer item 1 regarding public / private delineation of the site and delineation of which parts of the site remain open 24/7 and which areas would typically be closed off after retail hours.</i> - Updated comment: Refer UDG Section 06 Mixed-Use & Day-Night Activation as well as references to public domain day-nighttime access (Section 12, 16, 17).
5	Undertake figure-ground analysis diagrams (Nolli Plans) which investigate the overlay of built form, connectivity, and hierarchy of open space to ensure an appropriate ground plane, public domain balance is achieved across the site.	<p>Satisfied in the context of the proposed Concept DA.</p> <p>While a figure ground diagram hasn't been included within the documentation set, the architectural package and Landscape and public domain report provides sufficient detail to determine the interrelationship between open space / public domain and building envelopes. While the Urban Design Report includes metrics of GFA and public domain areas including deep soil zone, this is not clearly represented on a single public domain reference design drawing or accompanying schedule of areas within the architectural package which would form part of any future development consent.</p>

		<p>Recommendations:</p> <ul style="list-style-type: none"> - Include a public domain and landscape drawing within the architectural package which clearly illustrates location of all public domain areas by type (public, private) which could also be broken into impervious, elevated landscaping and deep soil zone areas with corresponding area schedule. Exact detail of the material finishes is not required at this stage. This will ensure a greater level of co-ordination between the architectural package, urban design report and Landscape and Public Domain Report. - Include an overall schedule of land uses including open space and public domain within the architectural package. - Updated Comment: Schedules of public domain and landscape areas have been included in the reference design and the Urban Design Guidelines. The quantities which have been indicated at item 1 above are generally supported.
6	<p>The service laneway along the eastern extent of the site requires a more detailed review. Whilst there are clear pragmatic advantages of co-locating services, loading, click and collect and delivery functions, this edge interfaces with an existing residential precinct. These residential land uses will be exposed to a significant increase of traffic, noise and night lighting which may significantly compromise existing levels of amenity. Investigate a greater setback and/or built form responses to mitigate potential amenity impacts.</p>	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The service lane has been retained along the sites eastern edge and represents the most logical part of the site for which to accommodate it. The service land takes advantage of the two street frontages, entering from Frances Street in the south and existing through to Bay Street in the north and would provide direct loading access to the three large floor plate supermarkets and other loading bays as indicated.</p> <p>Based off the submitted plans, it appears this loading service land would for the most part be within an under-croft area of the floor(s) above. However, it needs to be clarified whether the entire eastern edge will have an acoustic wall as indicated on one of the sections submitted; but not currently indicated on the ground floor plan. It is noted that a landscaped area has been indicated almost the full length of the eastern boundary with varying depths of dimension off that boundary which will provide some visual relief to the loading area from properties to the east.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - The location of the service lane from an urban design perspective is supported however more detail comments are deferred to Council's traffic engineer. - Clarify between plan and section whether the service lane will be fully enclosed with an acoustic wall / noise attenuation measure to the eastern edge along its entire length.

		<ul style="list-style-type: none"> - Updated comment: Specific traffic and service vehicle movement comments are deferred to Council's traffic engineer. It is anticipated the detailed design of this service area including acoustic and amenity considerations will be determined as part of more detailed future development applications for this stage of building works.
	Landscaping and public domain	
7	Explore a variety of widths and scales for the numerous pedestrian connections into and across the site.	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The site master plan as reflected within the envelope plan, reference design and Urban Design Guidelines now includes a hierarchy of predominantly north-south and east-west pedestrian links which confluences around the green heart.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - The hierarchy of pedestrian connections and resultant building envelopes as reflected within the reference design are generally support. - Refer to recommendation in Item 2 & 3 above relating to legibility and travel distance to 'enter the site' from the main CBD intersection of Wharf and Bay Street. - Updated comment: Refer UDG Section 12 Street Level — Open Space Structure Plan which provides dimensions of the varied public domain spaces.
8	There is opportunity for a significantly larger dimensioned area of public domain which could more proportionally balance the commercially controlled parts of the site. As a key city centre site, it is important that the public domain supports a range of user groups, not only for those who are engaging in the commercial functions (shopping, eating etc.). Further explore the reimagining of the existing central mall part of the site as a more memorial and accessible large landscaped public domain area.	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The site master plan as reflected within the envelope plan, reference design and Urban Design Guidelines includes an uplift in the overall proportion of public domain area when compared to the earlier iterations. Public domain areas now represent 10990sqm or 22% of the site area at the ground level of which 3 624sqm or 7.2% of the site area are deep soil areas. This is supplemented by further extensive landscape (hard and soft) areas at the podium and upper levels (on structure).</p> <p>Importantly the reference design now includes a larger 'green heart' which is at the confluence of a series of north-south and east-west pedestrian pathways representing an improvement from earlier iterations. The submitted reference drawings and renders indicate a series of scaled public domain areas and a unifying shade structure over the green heart public domain space as well as the inclusion of water. Together these elements have a strong potential to deliver a unique area of public domain which draws on the local climatic context and cultural history.</p>

		<p>The number of pedestrian points of access reflects a design approach to 'open up' the site as an extension to the surrounding city which is supported. This increased accessibility across the site during different times of the day and night warrants further clarification in terms of security and CPTED considerations.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>Investigate opportunities to include additional deep soil above 6.7% of the site area within the ground plane area where the basement is split as well as other DSZ opportunities around the site's perimeter. It is noted the landscape and public domain reference design DSZ area aren't co-ordinated with the DSZ nominated within the architectural package. As per item 5 above include a consolidated landscape/open space/DSZ/public domain drawing within the architectural package.</i> - Updated comment: Total deep soil zone now accounts for 3624sqm or 7.2% of the site area are deep soil areas which is also supplemented by additional 'planting over structure' areas. The basement car park as reflected within the reference design includes a split basement to achieve a great proportion of DSZ area. - <i>Refer item 1 regarding public / private delineation of the site and delineation of which parts of the site remain open 24/7 and which areas would typically be closed off after retail hours.</i> - Updated comment: Refer UDG Section 06 Mixed-Use & Day-Night Activation as well as references to public domain day-nighttime access (Section 12, 16, 17). Operational matters
9	Consider split basement options to introduce opportunity for more deep soil zones deeper into the site. Larger deep soil zones would improve the user amenity and character of public domain as well as retail spaces.	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The basement in part has now been split and the DSZ footprint between basements aligns with the primary north-south pedestrian pathway at the ground plane. This provides better opportunity for deep soil plantings within the central part of the site.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>The basement split to create a potential landscape DSZ within the site is supported.</i> - <i>It is noted that this space however aligns with the main north-south street which has a high proportion of hard / potentially impervious surfaces.</i>

		<p><i>Investigate landscape opportunities to further capitalise on deep soil planting in this location.</i></p> <ul style="list-style-type: none"> - <i>Investigate opportunities to increase DSZ opportunities around the perimeter of the site.</i> - <i>Ensure there is adequate dimension between buildings to enable mature tree growth. Some images allude to large fig trees which may not fit within the current space allocated.</i> <p>Updated Comment: The UDG further clarifies areas of planting at the ground level (Refer Section 15 – Street level – Landscape Structure Plan) which includes:</p> <ul style="list-style-type: none"> ○ 5300sqm indicative canopy cover. ○ 4000sqm softscape. ○ 12 500sqm hardscape.  <p><i>Image: Increase proportion of landscaped deep soil landscape where basement is split and around site perimeter.</i></p>
10	<p>Whilst there is clear intent to acknowledge and integrate principles of designing with Country, the articulation of such is not yet evident. The proponent is encouraged to include a cultural heritage specialist to support designing with country</p>	<p>Conditionally satisfied in the context of the proposed Concept DA.</p> <p>Following DRP 01 the design team met with the Tweed Byron Local Aboriginal Land Council to discuss the project and undertake a cultural tour of the area. The cultural</p>

<p>and present learnings from forthcoming engagement with the local aboriginal community across all stages of the project.</p>	<p>tour and appreciation of the layered ecological landscape of surrounding vegetative communities has informed the subsequent design.</p> <p>This is articulated through a greater proportion of landscape area and ideas of ‘deep green’, central public domain area facilitating the coming together of community, integration of water within the landscape and choice of landscape species endemic to the local area and indicators of seasonal variations. The public domain spaces of varying scales provide ample opportunity to introduce cultural artworks and storytelling.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>Limited deep soil zone areas across the site will limit the practical ability to achieve the ‘deep green’ landscape aspirations. Increase the overall area of deep soil zone within the north-south pedestrian link which has access to deep soil.</i> - <i>Continue to liaise with the TBLALC at key project stages to get feedback and advice on how to further integrate ideas around designing with and for Country.</i> - Updated Comment: <i>The UDG further clarifies areas of planting at the ground level (Refer Section 15 – Street level – Landscape Structure Plan) which includes: <ul style="list-style-type: none"> ○ 5300sqm indicative canopy cover. ○ 4000sqm softscape. ○ 12 500sqm hardscape. </i> - <i>An opportunity has been missed in terms of clearly articulating how the site will integrate principles of Connecting with Country and articulate local aboriginal cultural heritage across the public domain elements of the site. It is however acknowledged that there are some references within the UDG Section 29 Wayfinding and Signage, Section 30 Public Art, Section 31 Landscape Design & Tree Species Selection which reference historic and cultural interpretations and opportunities to showcase locally endemic and cultural significant flora.</i> - Suggested Condition: <i>Include a section within the UDG which reference to the GANSW Connection with Country Framework and articulates how those principles have been applied in terms of site planning and landscape design outcomes. This could also include a specific section which articulates specific objectives and strategies to integrate local aboriginal cultural heritage across public domain parts of the site as well as highlighting the need to consult and</i>
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		involve the local aboriginal community within the detailed design stages of the project.
	Building Height	
11	The proponent and design team should continue to work towards a more balanced outcome across the site which preferences a higher proportion of public domain and landscape open space generated through rationalising and redistributing density and height.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The reference design represents an improved proportion of public domain, landscape, and open space compared to previous iterations. A redistribution of height and density to further liberate the ground plane further for additional public domain has not been pursued. The submitted UDG and Landscape and Public Domain Reference Design illustrates a series of different varying scaled but interconnected public domain and landscape areas. However, only 8.3% of the site for deep soil zone is a relatively small proportion given the sites overall area.</p> <p>It is however acknowledged that this deep soil zone area is further supplemented by other forms of planting consisting of:</p> <ul style="list-style-type: none"> ○ Ground floor softscape 3364sqm. ○ Level 01 Softscape 8348sqm. ○ Level 02 Softscape 1482sqm. ○ Level 03 Softscape 3743sqm ○ Rooftop Softscape 17677sqm ○ Canopy Structure 1331sqm. <p>Based on the reference design within the Landscape and Public Domain Report, the areas of planting across the site total 35 945sqm.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - The reference design represents an improved balanced between building height and public domain area compared to earlier concept iterations. - Update comment: Height and density distribution has not been pursued as the proponent wishes to pursue a concept application within the limitations of the 49.5m AHD maximum height limit. - Refer to item 8 and 9 above regarding opportunities to increase the DSZ proportion across the site. - Updated comment: While the overall area of deep soil remains at approximately 8.3% of the site area based on the reference design, the overall area of where plantings could be achieved represents an area of approximately 35 945sqm or 71.88% of the site area. While many of these

		<p><i>areas wouldn't be directly accessible by the public (roof tops etc), or support larger vegetation, it does represent on balance a good overall proportion of soft scaping across the site.</i></p>
12	<p>Investigate a more amenable compliant building height scheme rather than the compliant building height 4:1 FSR scheme as presented which was deemed to be lacking in application of appropriate structure planning, urban design, and landscape and public domain investigation. This may include an option which redistributes the available 10% building height development standard uplift (made available through TCCLEP Clause 6.10) across the site to better understand built form, building height and FSR relationships within a compliant context.</p>	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The reference design broadly complies with the maximum building height as defined under the Tweed City Centre Local Environmental Plan 2012 at 49.5m AHD with only minor building elements such as lift overruns exceeding the maximum HOB.</p> <p>From an urban design perspective there is opportunity to redistribute some GFA by way of building height across the site to get more diverse built form outcomes and potentially liberate some additional ground plane for further increasing public domain. However, it is recognised that this approach would require consideration of a building height variation which the proponent has indicated that do not want to pursue at this stage.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>Provide a Clause 4.6 Variation report to provide justification to certain building elements exceeding the maximum building height. Noting that as per TCCLEP 2012 Clause 6.10 (7), the 10% uplift in building height and FSR under subclause 6 only applies when a design competition has been held (winner of architectural design competition), not a design review process.</i> - Update comment: <i>The submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD.</i> - <i>The proponent's intent to achieve a TCCLEP 2012 building height compliant concept development application is recognised, however from an urban design perspective there is opportunity to explore the redistribution of building height more fully across the site to achieve more varied building forms and potential release additional area for public domain.</i> - Update comment: <i>Height and density distribution has not been pursued as the proponent wishes to pursue a concept application within the limitations of the 49.5m AHD maximum height limit.</i>
13	<p>Any future consideration of building height uplift should have a reciprocal uplift of public benefit through increased public domain and landscape area. In this regard a broader suite of site planning, public domain, amenity and character</p>	<p>As above.</p>

	considerations need to be concurrently considered rather than justification through a redistribution of FSR.	
14	Continue to engage with Council regarding the proposed uplift of the building height development standard across the site noting that building height as proposed will not be supported by Council in its current form and thereby introduces significant risk to the project's success.	As above.
15	Provide evidence of consultation with Gold Coast Airport and CASA by the design team to ensure concurrence with future design options.	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The originally submitted sections and elevations certain building elements such as lift and stair overruns, which exceeded the 49.5m AHD maximum HOB and as such would also penetrate the OLS. The building envelopes have now been amended and indicate all height below the 49.5m AHD maximum height limit.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - As the proposal will penetrate the OLS, be it by a relatively minor amount, consultation will be required with the Gold Coast Airport and relevant Commonwealth body about the application. - Update comment: The submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD.
	Land use	
16	The showrooms fronting Wharf Street and a future light rail node may result in long elevations with limited shopfronts or points of access.	<p>Conditionally satisfied in the context of the proposed Concept DA.</p> <p>The reference design illustrates five 'flexible' retail envelopes which front Wharf Street and an area of carparking (Council owned land). These retail areas are separated by five east-west pedestrian connections linking Wharf Street / car parking area with the main north-south shared street. This configuration represents a breakdown of overall scale compared to the design present at DRP 01.</p> <p>While this arrangement increases circulation around and through this space and results in a reduction of building frontages, there is opportunity to include finer grain of retail units in this location to improve opportunities for activation and scaled visual and physical engagement with this interface edge.</p> <p>Given this application is for the approval of the sites concept design and building envelopes, land use and detailed building design interrogation will occur as part of development applications which specifically relate to that stage of building.</p>

		<p>Recommendation:</p> <ul style="list-style-type: none"> - Refer to item 2 regarding matching fine grain retail uses with key public interfaces. - Updated comment: More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. - Suggested Condition: Impose a condition requiring the inclusion of an active edges section within the UDG which should include the ground floor of Buildings A, C, D and E in addition to other identified key active edge interfaces around the site.
17	<p>Boutique retail and fresh food market may be better positioned around the edge of an internal landscape public domain heart rather than occupying the core of the site.</p>	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The reference design illustrates the fresh food market still occupying a central core part of the site. This area now directly adjoins the 'Green Heart' public domain area where the previous DRP 01 did not.</p> <p>The revised configuration of the fresh food market lends itself to an extension of this public domain area and integrates with the longer site pedestrian links thereby encouraging permeation through this space. The location of the Fresh Food Markets is also collocated with the larger floor plate supermarket thereby facilitating a grouping of land use / program type towards the south-east corner of the site. It is also noted that smaller scaled retail units' line the perimeter surrounding the fresh food market area.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - The design advice to locate the fresh food market to the edges of the public domain area has not been pursued, however the proposed location represents an extension of the public domain and pedestrian circulation network through this space. - Given the nature of fresh food offer which can include take away food, opportunity to include an area of outdoor dining seating within this location should be considered. - Updated comment: More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. The location of the fresh food market in the reference

		<p><i>design is generally supported as it will activate the green heart public domain area.</i></p>
18	<p>Proposed entertainment or cinema uses on the north-west corner fronting the key Wharf Street / Bay Street intersection is likely to result in closed elevations to that interface.</p>	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The reference design ground floor land uses indicated on the Wharf and Bay Street corner now include food and beverage uses on the immediate corner with a larger retail unit fronting Wharf Street and retail on the level above. Cinema uses have been relocated to the southern edge of the site elevated above the ground plane at level 01 and level 02.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>The relocation of the cinemas is supported.</i> - <i>Refer item 3 above regarding achieving a stronger desire line from the Wharf and Bay St.</i> - <i>Reconsider the larger retail floor unit behind the F&B unit on the Wharf and Bay Street which will increase pedestrian travel distances to enter the site and potentially result in a long blank elevation dependent on retail use type.</i> - Updated comment: <i>More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. The location of the cinema in the reference design is generally supported as it will activate the green heart public domain area.</i> - Suggested Condition: <i>Refer to comments in item 3 above with regards to imposing a condition for requiring a wider pedestrian point of access off Bay St and delineation of active edges (including ground floor of Building A) within the UDG.</i>
19	<p>In order to further liberate ground plane and public domain space, explore an option to locate larger floorplate uses below ground in a basement configuration.</p>	<p>Advice not pursued but location of the large floor plate uses / supermarkets accepted.</p> <p>The three large floor plate supermarket allocations are still located in the south-east corner of the site rather than a basement. As part of DRP 02, the proponents architect indicated that the combined area of these floorplates in a basement would compromise the amount of car parking which could be provided to service the retail, commercial and residential functions across the site. Loading and servicing within a basement area also posed access and manoeuvrability issues.</p> <p>Recommendation:</p>

		<ul style="list-style-type: none"> - <i>No further action. During DRP 02 the proponent's architect indicated a basement option was considered but not pursued based on compromising carparking areas and difficulties of adequately designing service and delivery functions within a basement.</i> - Updated comment: <i>More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. The location of the large floor plate / supermarket uses as indicated within the reference design is generally supported as it relates to the service corridor which runs along the sites eastern edge and is configured such that they will not compromise public domain spaces which can occur through blank or dead elevations.</i>
20	As a mixed-use proposal there will be a need to demonstrate how the requirements of SEPP 65 and the Apartment Design Guideline are being met. This should include acknowledgement of site and structure planning considerations such as building separation and more detailed consideration of apartment configuration as the design progresses.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The submitted SEE addresses the principles of SEPP 65 including context and neighbourhood character, built form and scale, density, sustainability, landscape, amenity, safety, housing diversity and social interaction and aesthetics.</p> <p>While the concept plan is not seeking consent for the detailed design of the residential apartment buildings, the proposed envelopes have been considered in terms of accommodating future buildings to broadly comply with envelope and building separation requirements. Whilst the habitable and non-habitable rooms across floor plates have not been indicated, it is noted separation distances of 12m, 18m and 24m distances have been dimensioned which is reflective of separation requirements for buildings nine storey's and above.</p> <p>The architectural drawing package includes shadow diagrams between 9am-3pm during summer, winter, and equinox and the SEE indicates that based on a solar analysis 70% of the apartments will be capable of receiving at least 3 hours solar access on 21 June between 9am and 3pm. A more detailed analysis would typically be required as part of the assessment process for future individual buildings.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>A more detailed consideration of the SEPP 65 requirements will be addressed as part of the more detailed design of individual buildings.</i> - <i>Consider the interrelationship of the building envelopes and separation distances and overshadowing of public domain spaces. Improving the natural</i>

		<p><i>sunlight access particularly in winter months will require greater separation distances.</i></p> <ul style="list-style-type: none"> - Updated comment: <i>More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage.</i> - <i>The submitted building envelope plans indicate building separation which would meet minimum ADG separation requirements. It is noted that separation distances relate to interface rooms and spaces with habitable-habitable spaces requiring increased separation dimensions. These separation requirements will be enforced as part of future building specific development applications.</i>
21	Additional information will be required around the function and role of upper level 'adaptable' car parking (over supermarkets), the long-term intent of this area and how it would functionally relate to land uses such as childcare.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The reference design retains carparking at an upper level 01 running along the eastern edge of the site which would gain access and egress via two ramps off Frances Street. This carparking area would service the entertainment land uses (including cinema), medical centre, childcare centre and office space above. This carparking area and associated collection of land uses has been further resolved from the DRP 01 concept now with a more legible delineation of uses, separation from carpark areas and circulation / connectivity. The childcare area is now more separated from the car parking area although a direct pedestrian connection between carpark, medical centre and childcare is included.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>The upper-level car parking area and adjoining land uses is now more resolved in terms of relationship with adjoining land uses. While one pedestrian access point is nominated, there is opportunity to include a second point of access within proximity of the entertainment escalator.</i> - <i>Vertical circulation between floors in this location requires further co-ordination. For example, the level 01 entertainment escalator with up indication does not appear on level 02.</i> - Updated comment: <i>More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. The carparking in this location is generally supported as it relates to retail, medical, childcare and entertainment land uses as illustrated within the reference design.</i>

Tweed Mall – Design Review Panel 02 - Alignment with Concept DA

	Design Review Panel 02 Advice	Concept DA SPUD Comment Post RFI (May 2024)
No.	Urban Structure, site planning and circulation	
22	<p>Consider a wider dimension of public domain to the north-west of the site which more fully addresses the key intersection of Bay and Wharf Street and pedestrian movement from the north (Coolangatta) into the site. Building A currently has long elevations to that key intersection which may physically limit pedestrian movement and visual connections into and across the site. A wider public domain entry off the Bay and Wharf Street intersection would denote a northern 'front door' drawing in the pedestrian foot traffic from the busier Coolangatta approach and offering stronger sight lines towards the green heart.</p>	<p>Conditionally satisfied in the context of the proposed Concept DA.</p> <p>Design advice around achieving a wider more pronounce definition of pedestrian access from the north-west corner (main intersection of Wharf and Bay Street) relates to 'front door' legibility and foot traffic arriving from the Coolangatta direction. The current reference design instead retains a defined building edge to Wharf and Bay Street in this location. Rather than a more direct path, pedestrian entry points are located either 58m down Bay Street or 49m down Wharf Street. Whilst it is recognized that the proposed food and beverage uses on this frontage is a significant improvement to the current blank wall interface, the proposed envelope configuration creates longer pedestrian travel routes to access the internal parts of the site. As such it is recommended that the pedestrian point of access off Bay be widened and that the ground floor uses on Building A are to be 'active' and 'façade transparent' edges with no expansive blank elevations to ensure a lively pedestrian experience and amenity.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - Refer item 3 above regarding achieving a stronger desire line from the Wharf and Bay St. - Reconsider the larger retail floor unit behind the F&B unit on the Wharf and Bay Street which will increase pedestrian travel distances to enter the site and potentially result in a long blank elevation dependent on retail use type. - Updated Comment: The suggestion to include a more direct path of travel into the site from the Wharf and Bay St intersection has not been included. However, the reference design does indicate that this edge would be activated by food and beverage uses which is appropriate give its central CBD location. - Suggested Condition: Refer Item 3 above. Impose a condition /amendment to building envelope plans requiring ground floor envelope plan, wider pedestrian point of access off Bay Street and Wharf St the inclusion of an active edges section within the UDG to guide future land uses and achieve pedestrian amenity outcomes.

23	<p>Consideration of whether the dominant north-south axis will be open to vehicle movements will have a significant influence on the final urban structure configuration. Ensure the dimension of this corridor is sufficient to embed the flexibility to support a shared pedestrian / limited vehicle access without impacting on the extent of deep planting in this central area.</p>	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The master plan illustrates that the main north-south axis will be a shared zone incorporating vehicle movements in a single direction with vehicles entering off Frances Street and existing to the north into Bay Street.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>While the need for service vehicle access along the North-South Street is recognised, there is potential to lose the opportunity for a unique pedestrianised environment. This space will require a careful traffic management approach to ensure it is not dominated by vehicles particularly during core retail hours. Operational limitations of vehicle access in this regard should be considered as part of the traffic report.</i> - Updated Comment: <i>Specific traffic comments are deferred to Council's Traffic Engineer. Refer to comments and recommended conditions related to widening the ground level point of access/egress to Bay St to enable greater pedestrian and vehicle separation at Item 3 above..</i>
Landscaping and Public Domain		
24	<p>The 'grand stair' concept is generally supported however there is a risk of this space being perceived as being too steep or wall like and, therefore being unused. It is suggested that the design team consider how that significant level change could be mediated in a more amenable way. This could include a mid-point mezzanine or series of widened breakout and pause spaces which could also introduce additional opportunities for landscaping. The stairs in this regard could serve a variety of purposes (respite, meeting, performances etc). There is also opportunity to explore program beneath the stairs.</p>	<p>Satisfied in the context of the proposed Concept DA.</p> <p>The 'grand stair' has continued to be included within the reference design. Detailed consideration of the stairs has not been included within the building envelope architectural package although more detailed reference is made within the Landscape and Public Domain Report (Green Heart Section 01). Detailed design consideration would typically be determined at a future subsequent design review / DA stage (Stage 1A Construction). The design advice is still relevant to inform the design development of this key element of the site's public domain.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>A condition be applied which requires the more detailed design consideration of the grand stair to be included in a subsequent more detailed DA which address the landscape and public domain areas (Stage 1A Construction).</i> - Updated comment: <i>More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. The 'grand stair' as a concept and in this location as indicated within the reference design is generally supported.</i>

25	<p>Undertake a series of solar studies to better understand the relationship of the built form and overshadowing of the public domain areas during different times of the day and different times of the year. Landscape areas and appropriate vegetation types may be compromised where there is significant overshadowing.</p>	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>There are currently no formal guidelines which establish natural sunlight access and overshadowing limitations applying to shopping centres and public domain spaces on private land. Although the ADG does have guidelines which apply to the upper-level residential component of the development. Best practice would however seek to ensure a balance of natural light access during winter months for pedestrian comfort and vegetation health as well as areas of shade enabling visitors refuge from the hot summer sun.</p> <p>A series of shadow studies (9am, 12pm and 3pm during the equinox and summer and winter solstice) have been issued with the reference design. Across the northern edge of the site is a series of tower buildings (Buildings A – B - 14 storey's) which would overshadow at different times of the day and year. Along the western edge buildings C and D would be 13 storey's and building E being 11 storey's which would also overshadow public domain areas during the afternoon. Each of these towers are separated above podium level (12m gap) which would allow some sunlight to penetrate between these buildings and across the site.</p> <p>Central to the site the 'C shaped' formation of above podium the buildings have varying heights ranging from 6 storeys along the eastern edge, 7 storeys to the northern and southern edge and 11 storeys to the western edge which when combined would further contribute to overshadowing across the site.</p> <p>It is also noted that while the north-south road public domain width would enable opportunity to for a good level of northern sunlight access, the 14 storey Building B-C is sited at the termination of this alignment and would cast shadow across much of this space during midday hours. The widening of this aperture would result in less overshadowing of this public domain space particularly during winter months.</p> <p>The shadow diagrams provided indicate the main public domain spaces (and landscape areas) would receive minimal light between 9-12pm, and after 3pm. An hour-by-hour breakdown, with a focus on public domain areas would enable a better analysis of these potential impacts. Measures to reduce overshadowing across the site include:</p> <ul style="list-style-type: none"> • Increase North-south dimension at the termination with Bay Street including shifting the building mass of Building B-C from this axis alignment.
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		<ul style="list-style-type: none"> • Reduce the height of the building within the inner C. • Increase building separation at the upper levels for buildings lining the site perimeter to increase opportunity for natural light penetration between those building envelopes. <p>Recommendation:</p> <ul style="list-style-type: none"> - Provide an hour-by-hour breakdown of solar access /shadow during solstice and winter at a larger scale with area % / hour metrics to determine shadow impacts on public domain spaces. - If this more detailed analysis indicates significant overshadowing and poor natural sunlight access to key public domain areas increase building separation around the sites perimeter and adjust building heights, particularly within the inner core of the site. - Updated Comment: The reference design architectural drawing set includes solar access diagrams during the equinox, summer and winter solstice at three-hour intervals (see A-DA-404 Solar Access by Hour) based on the reference design scheme. The varied building form across the site will inevitably result in overshadowing of public domain areas at various times of the day and year. The north-south alignment of the main pedestrian spaces will receive solar access in the middle of the day in the middle of winter. Elevated communal open spaces on roof tops (such as Building J) also ensure that there is always an element of natural sunlight access during winter months. Conversely, the building form, including double volume canopy structure will provide much needed shade during summer months. Individual sunlight access diagrams will be required for each building approval demonstrating compliance with the ADG requirements for the residential components of those buildings.
26	While Council has expressed a desire to retain the easement fronting Wharf Street as an existing carpark and for the purposes of a future light rail and/or bus interchange, the design team is encouraged to include this area for this purpose as part of considering the overall site master plan.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>It is noted that a direction from TSC GM sought to remove consideration of the Council owned car parking area for the purposes of the concept DA.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - Consideration of active and public transportation linkages to public transport interchanges should be addressed within the Traffic and Movement Reports and considered within the overall master planning of the site. Note that Council's Roads and Traffic team are preparing concepts to upgrade bus

		<p><i>interchanges within the immediate area. The proposed bus site adjoining the site on Wharf Street (generally the same location as existing) should consider the path of travel from this bus stop into the site.</i></p> <p>- Updated Comment: <i>The reference design architectural drawing set retains the Council owned car park fronting Wharf Street. Overall, the sites masterplan provides multiple points of access from all street frontages. It is recommended that the most northern point of access from Wharf Street be widened to a min. 15m in recognition of a higher proportion of foot traffic from that interface.</i></p>
	Density Distribution and Building height	
27	<p>Consider an option which has varied building height, creating more diversity of building form at the perimeter of the site and a lower building form in the centre of the site. This alternate option would include the deletion of residential components of buildings G and H and J and K with GFA redistributed across the remaining buildings. The lowering of building height in the centre of the site would simplify the site structure planning configuration, reduce land use complexity and conflict, whilst improving overall public domain amenity.</p>	<p>Advice regarding redistribution of height and density not pursued but proposed building envelopes generally accepted.</p> <p>The reference design and resultant building envelopes plan seeks to comply with the maximum building height development standard of 49.5m AHD under the TCCLEP 2012. Within the limitations of that maximum building height the reference design provides the following height diversity:</p> <p>Building A – 14 storeys Building B (a,b,c) – 14 storeys Building C – 13 storeys Building D – 13 storeys Building E-a – 12 storeys Building E-b – 12 storeys Building F-a – 15 storeys Building F-b – 15 storeys Building BTR (East) – 6 storeys Building BTR (North) – 7 storeys Building BTR (West) – 11 storeys Building BTR (south) – 7 storeys</p> <p>Design advice to consider the removal of the residential components of the previously labelled buildings G, H, J and K has not been pursued. The intent of this suggestion deletion was to reduce the overall building height and mass from the centre of the site to achieve a more pedestrian friendly amenable scale of built form and reduced overshadowing impact on the public domain. Feedback at a Cllr workshop in regard to pursuing an options to redistribute height and density around the sites perimeter, which would require consideration of a building height increase was not supported. As</p>

		<p>such the applicant sought to reduce heights in accordance with the prevailing maximum building heights.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>In reference to the item 25 above regarding overshadowing, consider reviewing the height of the inner 'c' formation of build to rent buildings to reduce impacts of overshadowing on public domain areas and achieve a more amenable scale of built form which directly adjoin the main public domain spaces.</i> - Update comment: <i>In alignment with Cllr advice, the submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD. The 'inner c' formation of buildings height has not been reduced.</i>
28	<p>The panel indicated that a more modest variation to building height via a Clause 4.6 variation could be justifiable based on increased public benefit by way of further increasing the proportion of public domain and demonstrating how the redistribution of height and density would improve the amenity and useability of public spaces across the site.</p>	<p>Advice regarding redistribution of height and density not pursued but proposed building envelopes generally accepted.</p> <p>The concept reference design complies with the maximum building height as defined under the Tweed City Centre Local Environmental Plan 2012 at 49.5m AHD. Whilst it is recognised that the approach to retain building heights at this level to comply with the prevailing development standards, from an urban design perspective there is opportunity to redistribute some GFA by way of building height across the site to get more diverse built form and potentially liberate some additional ground plane for further increasing public domain. This may be pursued in a subsequent future development application following a review of outcomes associated with Council's current Growth Management and Housing Strategy in progress.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>The proponent's intent to achieve a building height compliant concept development application is recognised. From an urban design perspective, there is opportunity to explore the redistribution of building height more fully across the site in subsequent design excellence processes and development applications.</i> - Update comment: <i>In alignment with Cllr advice, the submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD. The 'inner c' formation of buildings height has not been reduced.</i>

29	Coalescing a redistribution of height and density across the site whilst increasing public domain is likely to result in a reduced overall FSR and residential GFA than what was presented as part of DRP 02.	<p>Advice regarding redistribution of height and density not pursued but proposed building envelopes generally accepted.</p> <p>Compliance with the maximum building height has resulted in a commensurate reduction of GFA between DRP 01 and DRP 02 schemes. The structure plan has also been reconfigured between design review sessions to generally increase the proportion of public domain space across the site. The current proportion of built form and building height does bring into question the impacts of overshadowing on public domain and areas of landscaping including deep soil zones. A more detailed assessment of that impact is required. One outcome maybe the lowering of some buildings in increase of building separation to enable more natural light into public places.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>In reference to the item 25 above regarding overshadowing, provide additional detail on overshadowing of public domain areas. Where there is excessive overshadowing, jointly consider the interrelationship of building height and building separation to increase natural light into those space particularly during equinox and winter periods.</i> - Update comment: <i>In alignment with Cllr advice, the submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD. The 'inner c' formation of buildings height has not been reduced.</i>
30	The interrelationship of the public domain areas, land use / program, building footprints, building heights, staging and resultant FSR will be key considerations to form the basis of a future concept development application.	As above.
Land use		
31	Consider the deletion of the residential components of buildings G, H, J and K. Street access arrangements to residential levels of Building J and K is convoluted and relies on a linking bridge across to building F-b. The residential levels of buildings G and H would potentially overshadow the public domain areas and the amenity of those units may be compromised by the mixed-use emanating land uses below. Having a lower scaled green heart to the site would result in a more amenable pedestrian experience.	<p>Advice regarding redistribution of height and density not pursued but proposed building envelopes generally accepted.</p> <p>The upper-level residential components of Building's G, H, J and K have been retained. Whilst the concept reference design does broadly resolve some accessibility based issued raised within the DRP 02, the allocation of building form and building height has largely been retained. As outlined in items 27, 28, 29 and 30 above, the outcomes of the building height, particularly within the inner core of the site needs to be more</p>

		<p>fully assessed against impacts of overshadowing and generally achieving an amenable built form scale within this part of the site.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - Further analysis required around the interrelationship between building height and overshadowing as per items 25, 27 and 29 above. - Update comment: In alignment with Cllr advice, the submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD. The 'inner c' formation of buildings height has not been reduced. As per comments made at Item 1 and 25 above, there are not currently any guidelines to inform an appropriate balance of natural light penetration and overshadowing to public domain areas on privately owned sites. However, the best practice approach is to ensure there is opportunities for natural sunshine access during winter months and areas of shade during summer months. The sunshade diagrams demonstrate submitted as part of the reference design indicate there will be a mix of sunlight access and shaded areas within the public domain areas at different times of the day and year. Future applications will assess the more detail design and overshadowing impacts of individual buildings.
32	As per comments within density distribution and building height, there is opportunity to explore an option which redistributes part of the GFA deleted from buildings G, H, J and K across the remaining perimeter buildings. This would result in an outcome that would be arguably more economical to develop, provide a great degree of delineation between residential and other mixed uses and improve the public domain amenity through the middle of the site.	As above.
33	In lieu of some residential GFA there is opportunity to include additional hotel and serviced apartments to capitalise on and further promote regional tourism.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>In the context of the concept development applications scope, a detailed breakdown of residential and tourist accommodation types is not yet known. As part of the reference design DA-010 the yield schedule provides the following breakdown:</p> <ul style="list-style-type: none"> • Residential GFA: 114 632sqm • Tourist and visitor Accommodation: 4 537sqm • Commercial / Office GFA: 14306sqm • Shopping centre GFA: 45 126sqm

		<ul style="list-style-type: none"> • TOTAL: 178 601sqm. <p>It is recognised that subsequent building specific development applications a more detailed breakdown of housing types would be provided. It is important that this is measured against the concept development application targets.</p> <p>It is noted that some visitor accommodation has been provided within the reference design (Building E-b) located on the sites south-west corner. In addition, and contributing to residential diversity, two buildings are nominated as seniors housing (Building F-a; F-b). Additional short-term accommodation could potentially be provided within the series of residential towers across the site.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> - <i>Provide a breakdown of unit and tenure types 'density and housing type targets' across the site. Generally, there will be a requirement to include a range of unit sizes and tenure and affordability options to meet the needs of Tweed's growing population and tourist needs. These targets would then be used to measure outcomes against future staged development applications which will more specifically address unit composition.</i> - <i>The proponent is encouraged to commence discussions with local community housing providers regarding opportunities to incorporate social and affordable housing types within the overall housing mix across the site.</i> - Updated comment: <i>Detailed breakdown of residential and tourist dwelling types is not expected as part of this concept development application. More detailed land use and building design consideration, including a more detailed breakdown of accommodation types will occur as part of future development applications which will specifically relate to relevant project stages.</i>
34	There is opportunity to explore the inclusion of the fresh food market more fully as a defining part of the sites retail offer and point of difference from other surrounding regional retail centres (precedents could include Adelaide's Central Markets, the Queen Victoria Markets in Melbourne, Santa Caterina Market in Barcelona).	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The reference design locates the fresh food market between the principle public domain area (green heart) and the three larger floor plate supermarket areas within the south-eastern corner of the site thereby forming a synergy of land use (fresh food, food retail) contributes to a diversity of built form scale across the site.</p> <p>The built footprints of the fresh food market relate to the overall circulation network. Being smaller scaled elements with circulation in and around, they would facilitate a</p>

		<p>vibrant and interesting retail interface. There is however opportunity to include a common sit down / dining area within this part of the site.</p> <p>Recommendation:</p> <ul style="list-style-type: none">- Allocate space within the fresh food market area for a dining / seating area.- Updated comment: More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage. The fresh food market as a concept and in the location as indicated within the reference design is generally supported.
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Tweed Mall – Design Review Panel 03 - Alignment with Concept DA

	Design Review Panel 03 Advice	Concept DA SPUD Comment Post RFI (May 2024)
No.	Site planning, building envelopes and circulation	
35	It is acknowledged the structure plan including network of internal pathways represents an extension of the City centre grid, however a more direct path of travel from the Wharf Street and Bay Street intersection into the site is still recommended. The current arrangement has 40-50m building frontages from the corner along Wharf and Bay St which extends pedestrian path of travel to access the internal parts of the site.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer item 1 and 3 above including suggested conditions.</p>
36	It is recommended that the building separation distances be reviewed and increased to provide more physical separation between adjoining buildings and open-up more generous sightlines into the site from both Wharf and Bay Street. For example, it is noted that the building separation at podium level between east west at one point is only 7.8m and between the podium of Building A-C being 2.5m which is considered insufficient.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments at items 1 and 3 above including suggested conditions related to increasing ground level building separation widths at Bay St and Wharf St interface.</p>
37	It is recommended that a SEPP 65 / Apartment Design Guideline test be undertaken for the proposed building envelopes to ensure subsequent development applications for individual buildings will be able to comply (building separation, sunlight, ventilation etc). It is noted in some cases the minimum 12m building separation has been nominated which is the minimum separation between non-habitable rooms of adjoining buildings when the reality is that 24m separation may be required (habitable to habitable). As a new development more generous building separation distances should be applied to avoid future amenity-based issues. The presentation of buildings to Wharf Street should also be considered to ensure the development does not present as a single wall of units but rather sequence of towers (noting that geometry of the towers on Bay Street are more effective in that regard).	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments at item 20 above. Future development applications will need to comply with minimum ADG building separation dimensions.</p>

38	It is understood that the main north-south and east-west axis will be open to infrequent / controlled vehicle movements in one direction (south to north, and west to east) and may have limited parking outside of core retail hours. The width of these laneway should comply with Council's minimum laneway carriage width (3.5m for single direction laneway) in addition to a more generous pathway width for pedestrian movement, landscape, outdoor dining etc either side. The northern and southern ends of the north-south axis currently have an insufficient dimension and, in some cases, have upper-level floors overhanging further enclosing these spaces. The submission of detailed sections at intervals through the laneway spaces, particular between Buildings A-B, is requested to demonstrate the dimensions and proportions of this space will optimise the pedestrian and landscape experience.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments at items 1 and 3 above including suggested conditions related to increasing ground level building separation widths at Bay St and Wharf St interface.</p>
39	Much of the north-south public domain area consisting of hard stand surfaces, would in part sit atop of the deep soil zone. Investigate opportunities to maximise the planting zone that will contribute to the green heart experience. For example, this may require adjustment of the DSZ / basement alignment and greater setback of building envelopes to allow for a tree canopies along its length.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments item 1, 8 and 9 above. Whilst DSZ remains at approximately 8.3% of the site area, other landscaping areas indicated within the reference design, including at upper levels and roof levels, provide approximately 35 945sqm of planted areas across the site.</p>
40	Achieving legible access to the residential levels of Buildings G, H and J still presents challenges. Provide circulation diagrams to more clearly illustrate how Building G, H and J are accessed from car parking areas as well as street edges. It is also noted that a 'concierge' foyer management arrangement servicing the build to rent housing would make this element vulnerable to ongoing operational costs and thereby be contrary to the affordability intent of this building type.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Circulation and access to all buildings is not yet resolved in any level of detail within the within the reference design and is beyond the scope of the proposed concept development application. More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage.</p>
41	Buildings G, H and J as currently proposed have a large, connected envelope of approximately 150m in length by 100m in width. Whilst it is recognised height varies across these buildings, this envelope presents as considerable bulk and mass, particularly experienced from the eastern neighbouring properties. It is recommended that this building	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Updated building envelope plans now illustrate a 24m break between Buildings G-H, and a 12m break between buildings G-Ia, Ib-Jb, Ja-H. This will have the effect of breaking down the overall bulk and volume of these buildings envelopes as well as open up sightlines and natural sunlight access into upper levels of those building.</p>

	group be reduced into smaller building envelopes to reduce the bulk, scale and mass.	
42	Previous design advice has indicated a preference to reduce the scale of development from the sites inner core. Whilst it is recognised the preference is for a complying building height scheme, extraction of residential GFA from the inner core around the site's perimeter would present a more efficient site planning outcome. It is conceded however that significant building height increases would trigger the need for an amendment to the Tweed City Centre Local Environmental Plan maximum building height development standard.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments item 27,28 and 29 above. In alignment with Cllr advice, the submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD. The 'inner c' formation of buildings height has not been reduced.</p>
No.	Urban Design, Public Domain and Landscape	
43	<p>The production of an Urban Design, Public Domain and Landscape Design Guidelines. The intent of this document would be to supplement the concept development application envelope diagrams to a high level of design quality and cohesion is achieved across subsequent development stages and buildings. Some of the heads of consideration would include but not be limited to:</p> <ul style="list-style-type: none"> • Project vision, objectives, and design principles. • Site design and configuration – structure planning design principles, staging, building set out, building separation and orientation, movement (public transport, cycling, pedestrian access), CPTED, streetscape and street address. • Built form – architectural style, articulation, elevations and façade systems, materials colours and textures, lighting, signage, sustainable design, accessibility. • Public domain and landscape – Public domain and landscape structure, design principles and planting strategy, vegetation types, hardscaping, lighting, art works and street furniture, water sensitive urban design. 	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>An Urban Design Guideline now forms part of the submitted documentation in support of the proposed concept development application. The contents of the UDG, which includes objectives and guidelines against a wide range of considerations will form part of the development consent and will guide the design and contents of all future development applications. As highlighted at items 1 and 10 above, it is suggested the following considerations are added to the UDG:</p> <ul style="list-style-type: none"> - Active Edges – A diagrams related to the proposed building envelopes which identifies primary and secondary frontages to the ground floor interfaces. The intent is to ensure lively and active frontages along primary pedestrian circulation routes and avoidance of long / featureless elevations. - Connecting with Country – Include a section and/or make relevant updates which articulates how connecting with country framework principles have been applied to the site planning and expectations in terms of how local aboriginal cultural heritage can be articulated within the public domain and landscape design of the project.
44	Additional opportunities should be to maximise landscape opportunities within the deep soil zone area. It is noted that this deep soil zone in part aligns with a significant amount of pedestrian hard stand area limiting the ability for larger scaled species. This is particularly the case towards the northern end of the north-south public domain areas. It is also noted that a water feature has indicatively been illustrated within this	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments item 1, 8 and 9 above. Whilst DSZ remains at approximately 8.3% of the site area, other landscaping areas indicated within the reference design, including at upper levels and roof levels, provide approximately 35 945sqm of planted areas across the site.</p>

	location which may take up room for deep soil zone planting and restrict east-west pedestrian movements across this space.	
45	The public domain areas including landscape areas needs to be more fully documented within the context of the stamped and approved concept development application including a schedule of spaces (hard stand, landscape, deep soil zone), type of space (public, private, business related etc) and dimensioning of all public domain and landscaped areas.	<p>Conditionally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments item 3 above including the suggested condition requiring the production of a ground floor building envelope plan. This should include a schedule of deep soil zones and public domain areas.</p>
No.	Land use, Carparking and Servicing	
46	As per comments within Site Planning, building envelopes and circulation, there is opportunity to explore an option which redistributes part of the GFA potentially deleted from buildings G, H, J and K to the site's perimeter buildings where access and legibility to those residential uses could be more efficiently managed. This would result in an outcome that may be more economical to develop, provide a great degree of delineation between residential and other mixed uses and improve the public domain amenity through the middle of the site.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments item 27,28 and 29 above. In alignment with Cllr advice, the submitted building envelope plans have now been amended and indicate all building envelopes would be below 49.9m AHD. The 'inner c' formation of buildings height has not been reduced. However updated building envelope plans now illustrate a 24m break between Buildings G-H, and a 12m break between buildings G-Ia, Ib-Jb, Ja-H. This will have the effect of breaking down the overall bulk and volume of these buildings envelopes as well as open up sightlines and natural sunlight access into upper levels of those building.</p>
47	Whilst it is recognised that not all land uses of allocated retail and commercial spaces will be full nominated and detailed for the purposes of the concept development application, a GFA / indicative land use schedule will be required to determine car parking numbers and service requirements will need to be provided.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Comments related to traffic and car parking is deferred to Council's Traffic Engineer. In the context of the concept development applications scope, a detailed breakdown of land use / GFA is not yet known. As part of the reference design DA-010 the yield schedule provides the following broad breakdown:</p> <ul style="list-style-type: none"> • Residential GFA: 114 632sqm • Tourist and visitor Accommodation: 4 537sqm • Commercial / Office GFA: 14306sqm • Shopping centre GFA: 45 126sqm • TOTAL: 178 601sqm. <p>It is recognised that subsequent building specific development applications a more detailed breakdown of housing types would be provided. It is important that this is measured against the concept development application targets.</p>

48	Based on an initial review of GFA there appears to be an undersupply of carparking. Given Tweed has a limited public transport network, one option is to re-allocate some GFA (south – eastern edge envelopes) to meet the shorter-term car parking deficit with a view to adaptability for the future when improve public transport becomes available.	As above.			
49	In lieu of some residential GFA there is opportunity to include additional hotel and serviced apartments to capitalise on and further promote regional tourism.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 33 above.</p>			
50	The proponent team is highly encouraged to initiate discussions with State Government Agencies (Department of Communities and Justice, Land and Housing Corporation) as well as local Community housing Providers (CHPs) to discuss options for social, seniors and affordable housing across the site. This could be in addition to or in lieu of a proportion of the build to rent housing proposed.	<p>Not required in the context of the proposed Concept DA.</p> <p>It is unknown whether the proponent team have commenced discussions with any State Government Departments or Community Housing providers. It is however noted that housing diversity is included as a section within the UDG (Section 35) where one of the objectives is:</p> <p style="padding-left: 40px;">a) Facilitate the delivery of diverse and affordable housing.</p> <p>And one of the guidelines is:</p> <p style="padding-left: 40px;">1. Alternative and affordable models of housing, such as: dual-key, seniors living, live/work studio, build-to-rent, and studios should be considered in the design.</p> <p>More detailed land use and building design consideration, including integration of an appropriate proportion of affordable housing, will occur as part of future development applications which specifically relate to this project stage.</p>			
51	Develop a design excellence strategy which sets out a continued design excellence and integrity framework to review future more detailed development applications. This could include a combination of design excellence competitions and design review panel processes. Any design excellence strategy would need to be in accordance with the Tweed City Centre local Environmental Plan 2012 Clause 6.10 and prepared in consultation with Tweed Shire Council and the NSW Government Architects.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>The submitted UDG sets out the design excellence strategy within the introductory section of the document. Each subsequent building stage / building development application will be the subject of a design review panel process. The design excellence process has been broken into project related stages:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%; padding: 5px;">Stage</td><td style="width: 33%; padding: 5px;">Designers</td><td style="width: 33%; padding: 5px;">Design Excellence / Design Integrity Review</td></tr> </table>	Stage	Designers	Design Excellence / Design Integrity Review
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		<table><tr><td>Stage 1</td><td>- CHROFI - Turf Design Studio</td><td>Prior to DA lodgement: - Design Review Panel review</td></tr><tr><td>Stage 2</td><td>- Diverse mix of designers</td><td>Prior to DA lodgement: - Design Review Panel review - Design co-ordination with CHROFI and Turf Design Studio, integrity review/letter</td></tr><tr><td>Stage 3</td><td>- Diverse mix of designers</td><td>Prior to DA lodgement: - Design Review Panel review - Design co-ordination with CHROFI and Turf Design Studio, integrity review/letter</td></tr></table>	Stage 1	- CHROFI - Turf Design Studio	Prior to DA lodgement: - Design Review Panel review	Stage 2	- Diverse mix of designers	Prior to DA lodgement: - Design Review Panel review - Design co-ordination with CHROFI and Turf Design Studio, integrity review/letter	Stage 3	- Diverse mix of designers	Prior to DA lodgement: - Design Review Panel review - Design co-ordination with CHROFI and Turf Design Studio, integrity review/letter
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		<p>The strategy seeks to retain the current team throughout Stage 01 and retain the design team in a design co-ordination/integrity role across all subsequent stages. Importantly the design excellent strategy requires All residential and non-residential development is to adhere to the Urban Design Guidelines, or to demonstrate superior outcomes of alternative design solutions.</p>									

Tweed Mall – Design Review Panel 04 - Alignment with Concept DA

Design Review Panel 04 Advice		Concept DA SPUD Comment Post RFI (May 2024)
No.	Integration of DRP Advice	
52	The structure plan arrangement has 40-50m building frontages from the main Tweed CBD intersection of Wharf and Bay St which extends pedestrian path of travel to access the internal parts of the site. The two nearest pedestrian points of access are only 9m in width between buildings A-B and 2.5m between buildings A-C. In lieu of a more direct diagonal connection from the intersection (which could take the form of a ground level arcade configuration) these dimensions are considered insufficient and should be increased to 15m in width to achieve a better balance of pedestrian amenity and visual connection between the site and surrounding CBD and Jack Evans Boat Harbour context. This suggested increased dimension takes into account the multi-purpose functions both of these key points of access will be fulfilling including, managing one-way traffic access which	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 1, 3 above which includes suggested condition requiring 15m dimension to laneway interface with Bay St and Wharf St.</p>

	will be turning onto Bay Street, being the key movement corridors for foot traffic entering the site from the Coolangatta direction and from the public transportation hub on Wharf Street as well as providing a higher level of pedestrian and public domain amenity in these 'front door' locations for an appropriate level of outdoor dining, landscape, seating, lighting, signage and public artworks.	
53	The amended building envelope diagrams weren't reviewed in any detail as part of DRP 04. As such, the previous commentary provided with regards to recommending greater building separation distances to provide more physical separation between adjoining buildings and open-up more generous sightlines into the site from both Wharf and Bay Street are still valid. It is noted that the Urban Design Guidelines (UDG) refer to the prevailing Apartment Design Guidelines requirements being applicable, and the panel agrees that the more detailed building separation consideration will be required as part of those subsequent development application processes. It is however important to impress that the building separation diagrams should establish a framework whereby those separation distances can be adequately achieved without the need for significant variation as part of those subsequent DA processes.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 1, 3 & 20 above.</p>
54	The panel agree that 'corner towers' massing option which reduces the bulk and scale of the eastern buildings improves that interface relationship. Further the building separation between Building J, G and H will open up beneficial sightlines, cross site airflow and sunlight access into the site. In particular, the separation between Building J-G will increase sunlight into the green heart which is especially important.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 46 above.</p>
55	Achieving legible access to the residential levels of Buildings G, H and J still presents challenges which were not addressed as part of DRP 04. Circulation diagrams should be prepared to accompany the concept development application to more clearly illustrate how those buildings can be adequately accessed by pedestrians and vehicles. Previous comments related to the operational appropriateness of a 'concierge'	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 40 above.</p>

	foyer management servicing the build to rent housing remain valid.	
56	The submission of additional sections across the site and focussing on the main north-south and east-west axis is required to review the interrelationship between the ground plane and face of the buildings in those locations. Based on the reference building, some of the upper-level project out and over the public domain spaces which will limit the type of landscape and tree species which could be established.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>A series of site sections have been included within the reference design. More detailed land use and building design consideration will occur as part of future development applications which specifically relate to this project stage.</p>
57	The panel notes additional information which has been prepared in relation to public domain and landscape open space within the open space, soil, street level trees and greening, podium greening, roof greening and green heart sections of the UDG. What is still required is the inclusion of the deep soil, landscape and public domain elements represented, dimensioned with area schedules within the envelope / structure plan drawing set which would typically be stamped as part of the concept development application. Typical details for tree planting in ground (showing soil volumes) and typical planting details on slab showing soil depths etc also be included.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 44 & 45 above.</p>
58	As previously noted, much of the north-south public domain area consisting of hard stand surfaces, would in part sit atop of the deep soil zone. The panel encourages the design team to further investigate opportunities to maximise the planting zone that will amplify the green heart experience which will be one of the projects defining features.	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 44 & 45 above.</p>
No.	Urban Design Guidelines (UDG)	
59	<p>The panel supports the production of the UDG to supplement the concept development application envelope diagrams to ensure a high level of design quality and cohesion is achieved across subsequent development stages, public domain, landscape, and buildings.</p> <p>The panel also supports the approach of not replicating the range of other prevailing urban design guidelines (Better Places, Regional Urban Design Guidelines, Tweed DCP B2</p>	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 43 above.</p>

	<p>Tweed City Centre, Tweed Regional City Action Plan etc), but seeks to compile a bespoke set of objectives and guidelines directly informed by the reference building concepts and formalised through the structure planning of the envelope drawing set.</p> <p>The key heads of consideration within the UDG are generally supported including Some of the heads of consideration would include but not be limited to:</p> <ul style="list-style-type: none"> o Introduction. o Urban Structure. o Public Domain and Landscape o Architecture 	
No.	Design Excellence Strategy	
60	<p>Subsequent design competition waivers would need to be certified in writing by the consent authority (which in this case is the Northern Regional Planning Panel) pursuant to Tweed City Centre LEP 2012 Clause 6.10 Clause 5 - Refer: State Environmental Planning Policy Amendment (Design Competition Guidelines) 2023 commenced 15 December 2023 (SEPP Amendment).</p>	<p>Generally satisfied in the context of the proposed Concept DA.</p> <p>Refer comments in item 51 above.</p>
No.	Other matters	
61	<p>Council has issued a concept plan for the required new sewer pump to be located on the development sites Francis Street interface. From a design perspective it is noted that the location of this pump is not ideally located being at the view line termination of Powell Street. To co-ordinate a mutually preferred location, your design team and their specialist consultants are highly encouraged to consult with Council's Water and Wastewater Team to confirm the location which is to be adequately accommodated within the concept development application documentation.</p>	<p>Comments related top the required water and wastewater infrastructure is deferred to Council's W&WW team. From an UD perspective, the inclusion of appropriate design measures including screening would be appropriately considered at the detailed design stage of that piece of infrastructure.</p>