

Date 26/03/24

Our Ref: DA/080/2023

Maroubra Property Developments Pty Limited
c/- Leigh Manser
Ground Floor
21 Solent Circuit
Baulkham Hills NSW 2153

Dear Sir/Madam,

SUBJECT LAND: 138 Maroubra Road, Maroubra
APPLICATION NO: DA/080/2023
PROPOSAL: Demolition of existing structures and construction of a 9-storey mixed-use development with 3 basement levels comprising 57 units, retail and commercial tenancies, 89 car parking spaces and strata subdivision. (Integrated Development: Approval required by Water NSW).

REQUEST FOR ADDITIONAL INFORMATION (FOLLOWUP LETTER)

Following from Council's previous request for additional information letter dated 17th October 2023 and the amended documentation received on the 1st March 2024, this letter has been prepared to outline Council's concerns with the proposed development at the above-mentioned subject land; offer an opportunity for amendments and response from the applicant and; advise that the following additional information is required to be provided to enable an appropriate level of assessment for your application.

A response to the matters raised within the 17th October 2023 request for information is still required to be submitted to Council. These matters are included below, and have been amended, where relevant, within this follow-up letter. Any points that have been addressed will include a strikethrough (~~example~~), and new matters are in bold blue-coloured font (**example**).

Design Excellence Advisory Panel Comments

1. Comments received from the Design Excellence Advisory Panel (DEAP) are attached to the end of this letter. In addition to the comments provided below and throughout this letter, the recommendations and issues outlined by the DEAP need to be adequately addressed by any revised architectural plans and supporting documentation.
 - a. Justification is to be provided as to why the substation and other services cannot be located facing Piccadilly Place so as to improve the Maroubra Road activation of the development. Note that further information is required on whether the site benefits from the easement from Piccadilly Place (see Point 21).
 - ~~b. The extent and layout of stairs throughout the development raise accessibility and safety concerns for future occupants and visitors. It is also noted that there is no open communal stair for use by occupants in the lobby area, and in the~~

~~case of lift failure, fire stairs must be used, which is not a good amenity nor a safety/security outcome for residents and visitors.~~

- c. Clarification as to why floor-to-ceiling levels differ throughout the upper levels of the development.

Additional comments concerning design excellence are outlined for consideration:

- d. For the reasons articulated under the other points within this letter, the proposal does not satisfy the requirements for the LEP design excellence clause and matters for consideration.
- e. Given the extent of unarticulated wall length of the western elevation, as well as on the eastern elevation adjacent to existing Pacific Square units (including balconies), there should be more distinctive and pronounced visual interest.
- f. The use of prefinished fibre cement sheets (and face-brick) require further refinement and consideration of alternate materiality or inclusion of public art (to the unbroken expanses of wall to both the western and eastern flank walls), given their prominence within the public domain and immediate visual impact to surrounding residences.
- g. Plans are to reflect desired internal floor-to-ceilings. As the floor plans appear to accommodate food and drink premises (kitchen exhausts, grease arrestor etc are noted) the ADG stipulates a FL-CL of 3.3m or 4m. A minimum of 3.3m could be accommodated for Level 1 to permit a range of permissible commercial uses (noting this would affect height: to be resolved per other points raised throughout this letter).
- h. Given recent changes due to the NCC and Building Commissioner, a minimum of 3.15-3.2m is now required for floor to floor heights in residential levels to achieve 2.7m ceiling heights – the 3.1m's indicated is insufficient and has not been demonstrated to be workable.
- i. The incorporation of ESD recommendations are to be illustrated on the plans.

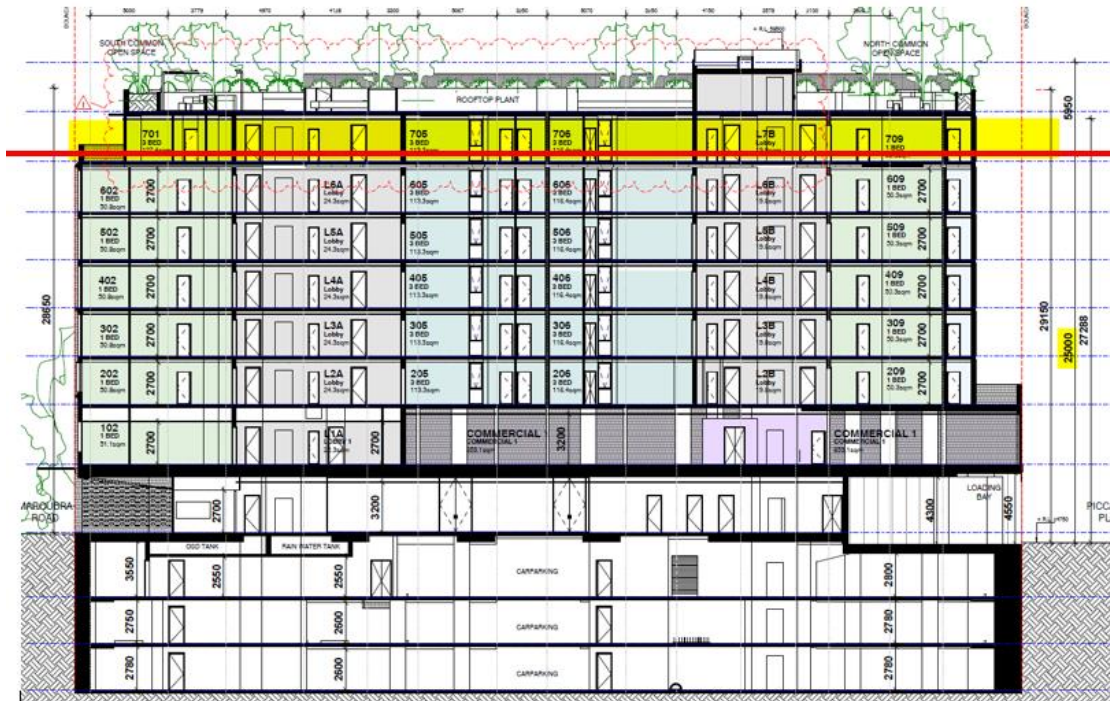
Inconsistency with the Randwick Local Environmental Plan 2012 (RLEP12) – Building Height:

- 2. The proposed building height of 31.6m (6.6m variation or 26%) is excessive for the context and intended planning outcomes for the site, significantly exceeding the RLEP12 standard of 25.0m.

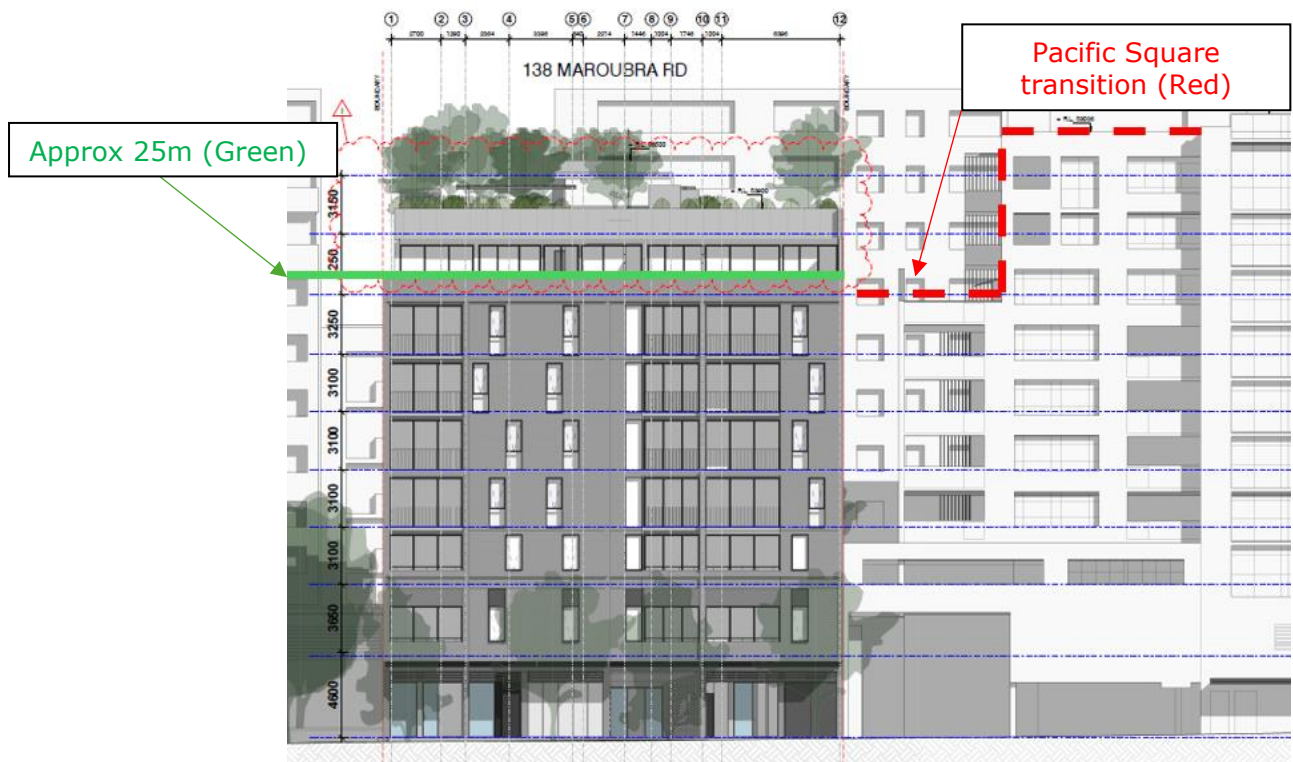
The submitted Clause 4.6 to vary the standard does not adequately identify adequate environmental planning grounds as to why the additional height (and storeys) are necessary, or that the objectives of the control are met. The non-compliance is exacerbated by the proposed scale and density and non-compliances with ADG and the specific controls for Block 6 (Maroubra Junction) within the RDCP13.

The submitted Clause 4.6 incorrectly identifies that there is no additional habitable floor area over the height of buildings control. However, it is evident that the proposal is one (1) storey of habitable floor over the height control, in

addition to 1 (one) storey of communal rooftop access, for a total of two (2) storeys over the building height control. Level 7 (storey 8) and above contributes to the height variation and magnification of scale and density of the development.



The intention of the controls applicable to new development, including the height standard applicable to the lot, is to provide a transition. The transition is initiated by the western elevation of “Pacific Square” fronting Maroubra Road, which is 6-7 storeys:



The proposed development is to be amended to achieve this transition and more appropriately respond to the applicable building height standard. A height variation solely to accommodate rooftop communal open space can be considered by Council, however, this is also subject to demonstrating adequate amenity outcomes concerning solar access (sunlight/overshadowing), views, and visual and acoustic privacy in accordance with the other matters raised in this letter.

There is merit (subject to additional design modification and the reduction of the proposal by at least one storey) to only include rooftop communal open space, including its access, as the only part(s) of the development exceeding the building height standard.

Council considers that the Clause 4.6 inadequately demonstrates that the objectives of the standard are met. The variation to the height of buildings standard does not establish sufficient environmental grounds to vary the standard, as:

- i. The grounds provided for the visual bulk impact on neighbouring amenity relies on comparing a building envelope standard, not building height. The visual bulk as a result of proposing an additional 6.6m above the applicable height standard needs to be addressed. To vary building height, the comparison needs to consider a compliant building height (25m), not only the variation from the DCP building footprint/envelope.
- ii. Nevertheless, the comparison provided considers a hypothetical built form of the “C” shape required by the DCP (described in the Clause 4.6 as *“two blank walls” to the eastern elevations*) whereas, in achieving design excellence, the intended built form outcome for the site per the DCP would be architecturally defined or articulated through the use of colours, materials, planter boxes, and breaks in this massing (as is intended by the DCP massing diagrams), or other architectural features to lessen the visual impact of development on this site.
- iii. The submitted Clause 4.6 considers that the proposed building height is reasonable based on compliance with the DCP building envelope standards (GFA and depth) for commercial and residential, however, this is incorrect. Refer to Point 3(c)(ii), below.
- iv. The non-compliant 3.0m setback from the western boundary, coupled with the need to enclose the balconies, exacerbates the visual bulk of the development and is a poor amenity outcome for all the units that solely rely on the western elevation for any outlook and solar amenity. This is not a reasonable ground to exceed the building height standard, particularly as it further burdens any future development at 136 Maroubra Road by requiring the adjoining site to increase separation distance, and further consider how that alternative massing would affect solar access into the building form currently proposed.

- v. The overshadowing analysis relies on a comparison of a DCP envelope scheme, rather than a compliant building height. Nevertheless, the provided sun-eye diagrams clearly illustrate a benefit (primarily solar access, privacy and outlook), to Pacific Square with the “ADG envelope” and “DCP Envelope” (DA8.324).
 - Refer to additional comments under Point 4.
- vi. The Clause 4.6 references View Impact Renders prepared by Virtual Ideas (‘Appendix A’), however these have not yet been supplied for DA assessment and have not been found attached to any submitted documents. With further respect to Point 27 of this letter, a number of submissions have been received by residents of Pacific Square concerned by the impact of the built form and loss of horizon and water views. These concerns need to be included as part of any view loss analysis submitted with the development application.
 - The view loss assessment within the Clause 4.6 solely considers northern neighbouring units, with insufficient consideration of the eastern Pacific Square units.
 - The provided view loss analysis clearly demonstrates that there is significant removal of the water views as a result of exceeding the building height standard.
- vii. Further consideration of the proposed building height variation (being an additional storey plus communal open space), not just the comparison to the DCP envelope, is required. Building Envelope and Building Height are two separate standards/controls.

Inconsistency with the Randwick Comprehensive Development Control Plan 2013 (Maroubra Junction Controls & Objectives):

- 3. The site is subject to the specific controls outlined in Part D4: Maroubra Junction Centre of the Randwick Comprehensive Development Control Plan 2013 (RDCP13) and the controls stipulated by Block 6. These controls provide direction for a suitable building envelope. The following matters have been identified as requiring an amendment or further information to comply with the provisions and objectives of the RDCP13:
 - a. As there is no FSR standard applicable to the site, the desired density for the site is established by the DCP. The overarching envelope standards applicable to the site are established under Part 3.1.3 of the Maroubra Junction DCP. The envelope controls establish where a building may be proposed. Controls under Part 3 apply to all blocks.
 - i. The development has not demonstrated that the proposed percentage of commercial and residential gross floor area is compliant per Part 3.1.3 Building Envelopes:
 - *Residential floors: All developments are to demonstrate that the gross floor area achieved occupies not more than 70% of the maximum building envelope for residential floors.*

- **Commercial floors: All developments are to demonstrate that the gross floor area achieved occupies not more than 80% of the maximum building envelope for commercial floors above the ground floor.**

- ii. The submitted Statement of Environmental Effects prepared by Ethos Urban, dated 1 March 2023; as well as the addendum submitted on the 1st March 2024, state: “*The GFA of the proposed ground and first floors does not exceed 80% of the maximum building envelope. The GFA of the proposed residential floors does not exceed 70% of the maximum building envelope*”. However, no breakdown of the maximum building envelope compared to the proposed residential and commercial GFAs has been provided. It is to be demonstrated that there is compliance with this standard, and thus the building envelope requirements.
- b. The first two levels (i.e. Ground and level 01) are to solely be for commercial purposes, with the residential components above. The three (3) residential units fronting Maroubra Road on Level 01 are to be deleted. This will assist in providing a reasonable level of amenity for the mixed-use development, and encourage commercial and retail uses within this precinct. Insufficient justification and economic grounds to vary this control for the provision of residential units on this level have been provided.
 - i. Further, it is unclear if these commercial spaces would be further divided to create more tenancies, and therefore the space will be poorly fragmented in terms of solar access (natural sunlight) and natural ventilation.
 - c. Block 6 restricts the site to a 6-storey height control. The proposal seeks a scheme that is 9-storeys (8 habitable storeys), inclusive of rooftop plant/services, **though it is noted that the top level has been converted from residential to rooftop communal open space**. This is in addition to the proposed variation to the Randwick Local Environmental Plan 2012 (RLEP12) Clause 4.3 maximum standard of 25m for building height.

The purpose of this DCP standard is to inform an appropriate density for the site where there is no strict FSR standard, provide a transition from the existing surrounding development, and achieve the desired future character for the lots along Maroubra Road. The transition in storeys has, contextually, been initiated by the western elevation of the Pacific Square development, which steps down to read as 6 storeys on the Maroubra Road frontage (**see Point 1**).

- i. The proposed development is required to be further reduced in height and storeys to improve the amenity of existing residences to the north and east; improve view sharing; and remove the onus from the future development to the west (136 Maroubra Road / Police Station) to fulfil the outcomes of the DCP which would compete with the subject premises for the potential future amenity of residential and commercial occupants. Further, the proposed height and scale undermines the intent for Block 6 to locate dominant built forms to the corner of Anzac Parade and Maroubra Road, thus the proposal in its current form affects the hierarchy of buildings along Maroubra Road.
- d. Though the RDCP outlines a nil setback requirement (relevant to building envelope), compliance with building separation is still required, and the

proposed building envelope and form needs further consideration. In its current form, the proposed development does not meet minimum building separation requirements per Sections 3.1.6 and 3.2.6 of the RDCP, nor as required by the Apartment Design Guide (ADG).

- i. The development relies on 'pop-out' windows to habitable rooms on the eastern elevation to provide privacy at the cost of internal residential amenity. This is an unacceptable design solution in this instance as it offers little to no outlook for bedrooms on the eastern elevation and is contrary to *Principle 2: Built Form and Scale* of SEPP 65, and design guidance stipulating that a window should be visible from any point in a habitable room.
- ii. No assessment of the acoustic impacts of the Child Care Centre to the east and Police Station to the west has been undertaken. The noise generated by these two existing land uses, in conjunction with non-compliant building separation, exacerbates the loss of visual and acoustic amenity to both the occupants of the subject site and adjoining land uses. An updated Acoustic Report is to be provided in consideration of adjoining and proposed land uses.
 - Reconsider the relationship of the 'commercial open space' to adjoining land uses, including the Child Care Centre, residential apartments of Pacific Square, and the private open space of Unit 103; noting the residential component is to be deleted from Level 01.
 - **The assessment is required to establish the child care centre and police station as existing noise-generating development, and identify the results of such data and modelling on the proposed development. The adjacent bedrooms and living areas are not an "infrequently utilised space" (as discussed at the recent Panel briefing) and such a claim fails to consider night-shift workers; the retired; and residents who work from home. The provided acoustic report only addresses road traffic noise as an impacting factor on the development.**
- iii. The development does not align with the Building Envelope Plan illustrated in Section 3.2.6 of the RDCP. In its current form, the proposed building scale and density do not achieve favourable amenity outcomes in terms of outlook, solar access, view sharing, and privacy as a result of the relationship of the proposed communal open spaces to adjoining land uses (including windows and balconies of units directly adjacent). There are opportunities to improve and comply with the building separation requirements of the ADG, and the height of the development, that will balance amenity and environmental outcomes with design excellence.
 - **It has not been demonstrated that a compliant DCP envelope (i.e. two tower ends of the "C" shape) is a poorer outcome compared to the proposed development, noting that visual bulk is a relevant consideration and reinforces the "C" shape configuration of the DCP.**

- With respect to landscaping in the intended central courtyard, there are options and species available to accommodate an environment consisting of shade and part-shade tolerant plants.
- Roof-top communal open space for a DCP-compliant envelope is also a reasonable and appropriate outcome for the site for solar access to communal open space in conjunction with the amenity outcomes achieved by the intended central courtyard.

Apartment Design Guide (ADG)

4. The scale and quality of the submitted sun-eye diagrams and shadow diagrams are inadequate in enabling an appropriate level of assessment of shadow and solar impacts caused by the proposed development. Given the scale of development, it would assist Council if only glazing were coloured, and the units were labelled. The scale should also be increased (i.e. fewer diagrams on the one page, particularly for the sun-eye diagrams).
 - a. Based on the detail provided, Council has identified that that the proposed development achieves 2 hours of solar access to the **balconies and living rooms** of 36 apartments, which is 64%. The proposal is therefore non-compliant with the design criteria for Objective 4A-1. Compliance must be demonstrated.
 - b. **Drawings DA8.323 and DA8.324 are to be amended to show the full context of the development.**
 - c. **Given the proposal relies on both sites deviating from the DCP envelope, a separate set including the future indicative Police Station site development (similar to the two typologies illustrated on DA0.150) and in the form of hourly sun-eye diagrams (rather than shadows) is to be provided.**
 - d. **The yield/number of apartments is not a relevant planning standard in the assessment of the application.**
 - e. **The submitted Solar Access Assessment (Version 2, dated February 2024) is to be resubmitted with “Appendix B” to assist in the assessment.**
5. All apartments and balconies should be fully dimensioned to enable a complete assessment of compliance with the ADG. Minimum private open spaces (balcony sizes) have not been met for all units, with some units designed with two smaller balconies to meet the total required, which does not result in private open spaces suitable for passive outdoor recreation. Compliance must be demonstrated.
6. The proposal only achieves cross-ventilation to 31 apartments, which is 55% and is not compliant with the minimum 60% specified in the design criteria for Objective 4B-3 in the ADG. Compliance must be demonstrated.
7. The proposed development does not comply with the separation distances specified in the design criteria for Objective 3F-1 of the ADG. Compliance must be demonstrated.

8. It needs to be demonstrated that the proposed development provides the minimum storage specified in Objective 4G-1 of the ADG. The plans note that each unit (a total of 56 units) is provided with 5m³ of storage in the basement; however, only 44 storage cages are illustrated on the plans.

- a. **Drawing DA8.250 (ADG & BASIX Compliance) does not demonstrate adequate storage is provided for each unit, with many falling short. Despite inadequate basement storage, it is also unclear which units have dedicated basement storage. The minimum storage requirements per Part 4G of the ADG apply:**

1. In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided:

Dwelling type	Storage size volume
Studio apartments	4m ³
1 bedroom apartments	6m ³
2 bedroom apartments	8m ³
3+ bedroom apartments	10m ³

At least 50% of the required storage is to be located within the apartment

View Loss Analysis

9. The view loss analysis has not been accompanied by photographs and photomontages from impacted units within “Pacific Square”, and it is unclear how the submitted images were generated. Additionally, the view loss analysis should include an overlay of the proposed built form, and a compliant built form (**height inclusive**), to enable adequate assessment of the potential for view loss.
- a. **It is evident within the provided documentation that the proposed height and scale results in view loss and additional overshadowing/diminished solar amenity, compared to a building that complies with both the building height standard and DCP envelope standard.**

Traffic Engineering & Parking

Note: At this stage the application has not been re-referred as the proposal, as amended, has not addressed any of the points below.

In its current form, the proposed number of parking spaces is inadequate for the density and scale of development, and will not cater for the needs of future occupants. Council has identified the following non-compliances, which must be addressed:

10. In relation to the residential component, the 56 units (comprising of 23 x 1 bedroom, 12 x 2 bedroom, 21 x 3 bedroom and 1 x 4 bedroom units) would generate a vehicle parking demand of 84 spaces including 14 visitor spaces. The proposed development provides 77 residential spaces including 8 visitor spaces, resulting in a parking shortfall of 7 spaces (8.3%) for the residential component.

- 11.** In relation to the non-residential component, there is a total of 1,630m² of GFA proposed comprising of 850m² (commercial) and 780m² (retail), thereby generating a parking demand of 41 spaces. Only 12 spaces have been provided, resulting in a significant parking shortfall of 29 spaces (71%).
- 12.** The development would require 125 spaces in total (84 residential and 41 commercial). The total proposed parking provision is 89 spaces (77 residential and 12 commercial), resulting in a total parking shortfall of 36 spaces (29%).
- 13.** In relation to motorbike parking, the development would require a total of 6 spaces comprising of 4 residential (0.05 x 84) and 2 commercial spaces (0.05 x 41). The proposed development provides 5 motorbike spaces, resulting in a shortfall of 1 space (16.7%) for the commercial component.
- 14.** Provision of car share facilities should be further considered.
- 15.** Further, in accordance with Section 3.3 in Part B7 of RDCP 2013 the variation to the parking rates must be adequately justified with reference to the matters listed in Control i). A green travel plan should be prepared, including detail on the following essential components:
 - a.** Methods of supporting walking, cycling, public transport and car-sharing;
 - b.** Site audit and data collection;
 - c.** Objectives and targets that define the direction and purpose of the travel plan. Targets should be specific, measurable, achievable and time-bound;
 - d.** Actions that will help achieve the objectives. Actions should provide incentives for using sustainable transport modes;
 - e.** A strategy for promoting and marketing the actions;
 - f.** A commitment of resources, including financial support and human resources to allow for implementation, monitoring, review and continual improvement of the travel plan;
 - g.** A monitoring and review process that sets out a systematic approach to measuring the impact of the travel plan; and
 - h.** Identify measures that can be integrated into the plan based on potential future uses and multiple tenancies of the retail and commercial floor space.
- 16.** The following details as to the function of the proposed parking and basement levels need to be provided:
 - a.** Security measures and the separation between residential and commercial parking;
 - b.** Dedication of parking for each use;
 - c.** Conflicting access to waste management services; and
 - d.** Adequate sight lines and swept paths from entry and exit points.
- 17.** The layout of basement parking needs to be resolved, with further consideration and amendments to address:
 - a.** The end car space adjacent to the basement wall at the north-west corner on all basement levels does not meet the minimum requirements of AS 2890.1
 - b.** These spaces will be difficult to access due to the intrusion of the columns into the adjacent parking aisle and car space. Their location at the end of a blind aisle (especially on basement level 3) requires it to be setback a minimum of 1m for the basement wall in accordance with AS2890.1. This setback has not been provided.

- c. Section B (Drawing DA2.101) indicates the minimum head clearance of 2.2m as required by AS 2890.1 will not be achieved on the ramp traversing between basement levels 1 and 2 and between the ground floor and basement level 1.
- d. The proposed 12 bicycle spaces on basement level 2 adjacent to the motorbike spaces are placed within an area only 2.16m x 0.80m. This is far too small to accommodate 12 spaces and does not meet the minimum dimensions required by Figures 2.1-2.5 in AS 2890.3.
- e. A 1.5m x 1.5m splay for sightlines should be provided at the north-west corner of the site at ground level adjacent to the driveway ramp to ensure pedestrian safety is maintained.
- f. The loading dock and associated swept paths must be designed to accommodate a 10.5m long collection vehicle (with an associated head clearance of a minimum 4.5m).

18. All ramp gradients should be annotated on the architectural plans.

Other Matters: Request for Further Detailing or Clarification

19. The extent and cumulative impact of non-compliances proposed are indicative of the overdevelopment of the site, as evidenced by;

- a. exceedance in building height and storeys;
- b. loss of views;
- c. insufficient separation resulting in winter gardens and pop-out windows;
- d. inadequate provision of storage to units;
- e. cross ventilation and solar amenity not meeting minimum requirements;
- f. significant deviation from the DCP building envelope standards (applicable floor area; building depth);
- g. insufficient parking;
- h. impact of overshadowing to balconies and living areas of the eastern apartments of Pacific Square;
- i. inadequate assessment of the child care centre and police station on the amenity of future residents; and
- j. insufficient grounds to establish that the proposed development is a better environmental outcome.

20. Site Area

The total site area is inconsistent between the survey plan (1,517.4m², by calculation), the submitted plans (the demolition plan shows 1,511.1m²) and the Statement of Environmental Effects (1,518.5m²). The correct site area is to be confirmed and utilised across all plans and documents. All calculations are to be updated accordingly.

21. Benefit of the Carriageway

Lot 2 in DP 506844 does not appear to benefit from the carriageway right over Lot 17 in DP 1150018. The development application does not address this in detail, nor whether there is a need for the consent of the servient tenement to the lodging of the subject application or a further development application to authorise the intensification of the use of the right of carriageway.

22. Flooding

Insufficient information has been provided as to whether Piccadilly Place and the proposed basement is prone to flooding, and as to how any flooding will be mitigated. Council cannot be satisfied nor properly consider the matters specified in clauses 5.21(2) and (3) of RLEP 2012 in the absence of further information as to the potential for flooding in Piccadilly Place and the proposed basement.

23. Plan of Management

A Plan of Management is to be prepared, including details in relation to the following:

- The management of waste (including the path of travel for the bin tug, and consideration of the number of trips required to accommodate the minimum required number of bins between the two waste storage areas and the bulky waste).
- Management of landscaped communal spaces.
- Management of services to accommodate both the commercial/retail and residential components (including in terms of loading/unloading, removalist trucks, delivery vans, contractors, and management of conflict with waste services).
- Implementation of a visual indicator/warning light for when the loading dock is in use.

24. Landscape Plan

The Landscape Development Application Package prepared by Place Design Group, dated 27 February 2023, does not contain a detailed landscape design plan or maintenance plan for the conceptual planting schedule to enable a thorough assessment of the proposed landscaping. The plans should also include the number of plants, per species, on the planting schedule.

25. Site Contamination

The Preliminary Site Investigation submitted with the application recommended that further soil investigations be conducted having regard to the multiple potential sources of contamination of the site arising from historical uses of the site and adjacent land, with such investigations including a Detailed Site Investigation (“**DSI**”) and Acid Sulfate Soils Investigation. In the absence of a DSI, Council cannot properly consider whether the site is contaminated or be satisfied that the site is suitable for the proposed development in the event that it is contaminated as required pursuant to section 4.6 of SEPP Resilience and Hazards.

The Acid Sulfate Soils Investigation should also be provided for assessment.

26. Waste Management

Arrangements for waste management do not align with the submitted Waste Management Plan. Amended architectural plans are to reflect the requirements of the WMP.

- The proposed development has not provided sufficient waste chutes with only one chute appearing to be provided adjacent to each of the separate lift lobbies. Separate waste chutes must also be provided for recyclable materials. Appropriate provision for convenient use of the chutes by residents is required to be demonstrated.

- The loading dock appears to have been designed for the swept paths of an 8.5m long Medium Rigid Vehicle to facilitate on-site waste collection. This is not satisfactory as the collection vehicle will be in the order of 10.5m long (with an associated head clearance of minimum 4.5m). The loading dock and swept paths are to be redesigned as required to accommodate the required collection vehicle size.
- The main waste bin room on basement level 1 is only accessible through the FOGO bin storage room. These rooms should be accessed separately or combined.
- The bulky waste storage area is proposed to be situated on basement level 2, making it impractical to transport large items up two levels to the loading dock for collection. It is to be relocated to as close to the loading dock on the ground floor as possible.
- The format and information included in the Waste Management Plan are not satisfactory. Council's standard template for Waste Management Plans as per RDCP 2013 and the Waste Management Guidelines must be used.

27. Stormwater Management

Insufficient detail has been provided in relation to stormwater drainage and rainwater collection within the development. The submitted plans and civil drawings detail a 12000L rainwater tank and 39.8m³ detention tank located between Basement 1 and the Ground Floor levels, with no detail as to:

- The method of stormwater collection;
- How stormwater from the rooftop and landscaped areas are collected or managed;
- Management of overflow; and
- Structural requirements to accommodate the infrastructure between levels and whether this would affect head heights within the car park (particularly in terms of accessible spaces).

This detail is to be provided.

28. Public Submissions

Submissions raised concern with:

- Traffic Generation, Parking and Queueing/Congestion
- Building Height and Storeys
- Building Separation
- Lack of Sustainable Measures
- Acoustic Impacts
- Economic Impact to "Pacific Square"
- Conflicts with Adjoining Land Uses (Child Care Centre and Police Station)

Council previously recommended that a GIPA be lodged to obtain the public submissions made against the development application.

It is appreciated that discussions have been held with representatives of the Maroubra Police Station raising concerns about overlooking into Police operations; loss of security into the Police site; noise generated by their current operations on the potential future residents of the site (noting Police operate 24 hours); and concerns that traffic congestion generated may affect response times.

We also understand there have been discussions with Police NSW regarding the provision of temporary parking in Maroubra Road, however, no details of this have been submitted with the development application – this needs to be confirmed as to whether this forms part of this application.

Police NSW remain concerned about the impact of the proposal on their operations. Council is aware they have drafted conditions of consent in the instance the application were to be approved, however, legally, these concerns and resolutions may not easily be addressed by conditions of consent, as they remain outside the scope of works and boundaries of this application. Police NSW matters need to be reasonably resolved (in addition to all other comments/points raised within this letter).

Further, details of noise and privacy measures (**including a proper acoustic assessment of noise generated by existing surrounding development**) are to be confirmed, keeping in mind the additional impacts on solar access and residential amenity as a result of these measures.

To enable your application to be fully assessed in time for the Sydney Eastern City Planning Panel briefing and determination, **please confirm your intent to submit the requested information**. All additional information must be submitted by **18th April 2023**.

If the information or a response is not received, the application will proceed to determination with the information currently available, which may result in the refusal of the application.

If you require any further information or clarification of the request, please do not hesitate to contact Krystal Narbey of GAT & Associates on 02 9569 1100 during business hours.

Yours sincerely,

Krystal Narbey
Town Planner
GAT & Associates
Consulting Town Planners

Cc: DA/080/2023

<p>English</p> <p>If you need help to understand this letter, please come to Council's Customer Service Centre and ask for assistance in your language or you can contact the Telephone Interpreter Service (TIS) on 131 450 and ask them to contact Council on 1300 722 542.</p>	<p>Greek</p> <p>Αν χρειάζεστε βοήθεια για να καταλάβετε αυτή την επιστολή, παρακαλείστε να έρθετε στο Κέντρο Εξυπηρέτησης Πελατών της Δημαρχίας (Council Customer Service Centre) και να ζητήσετε βοήθεια στη γλώσσα σας ή τηλεφωνήστε στην Τηλεφωνική Υπηρεσία Διερμηνέων (Telephone Interpreter Service — TIS) τηλ. 131 450 και να ζητήσετε να επικοινωνήσουν με τη Δημαρχία τηλ. 1300 722 542.</p>	<p>Italian</p> <p>Se avete bisogno di aiuto per capire il contenuto di questa lettera, recatevi presso il Customer Service Centre del Municipio dove potrete chiedere di essere assistiti nella vostra lingua; oppure mettetevi in contatto con il Servizio Telefonico Interpreti (TIS) al 131 450 e chiedete loro di mettersi in contatto col Municipio al 1300 722 542.</p>
<p>Croatian</p> <p>Ako vam je potrebna pomoć da biste razumjeli ovo pismo, molimo dodite u Općinski služni centar za klijente (Council's Customer Service Centre) i zatražite pomoć na svom jeziku, ili možete nazvati Telefonsku službu tumača (TIS) na 131 450 i zamoliti njih da nazovu Općinu na 1300 722 542.</p>	<p>Spanish</p> <p>A la persona que necesite ayuda para entender esta carta se le ruega venir al Centro de Servicios para Clientes [Customer Service Centre] de la Municipalidad y pedir asistencia en su propio idioma, o bien ponerse en contacto con el Servicio Telefónico de Intérpretes ["TIS"], número 131 450, para pedir que le comuniquen con la Municipalidad, cuyo teléfono es 1300 722 542.</p>	<p>Vietnamese</p> <p>Nếu quý vị không hiểu lá thư này và cần sự giúp đỡ, mời quý vị đến Trung Tâm Dịch Vụ Hướng Dẫn Khách Hàng của Hội Đồng Thành Phố (Council's Customer Service Centre) để có người nói ngôn ngữ của quý vị giúp hay quý vị có thể liên lạc Dịch Vụ Thông Dịch qua Điện Thoại (TIS) ở số 131 450 và yêu cầu họ liên lạc với Hội Đồng Thành Phố (Council) ở số 1300 722 542.</p>
<p>Polish</p> <p>Jeśli potrzebujesz pomocy w zrozumieniu treści tego pisma, przyjdź do punktu obsługi klientów (Customer Service Centre) przy Radzie Miejskiej i poproś o pomoc w języku polskim, albo zadzwoń do Telefonicznego Biura Tłumaczy (Telephone Interpreter Service — TIS) pod numer 131 450 i poproś o skontaktowanie się z Radą Miejską (Council) pod numerem 1300 722 542.</p>	<p>Indonesian</p> <p>Jika Anda memerlukan bantuan untuk memahami surat ini, silakan datang ke Pusat Pelayanan Pelanggan (Customer Service Centre) Pemerintah Kotamadya (Council) dan mintalah untuk bantuan dalam bahasa Anda, atau Anda dapat menghubungi Jasa Juru Bahasa Telepon (Telephone Interpreter Service - TIS) pada nomor 131 450 dan meminta supaya mereka menghubungi Pemerintah Kotamadya pada nomor 1300 722 542.</p>	<p>Turkish</p> <p>Bu mektubu anlamak için yardima ihtiyaciniz varsa, lütfen Belediye'nin Müşteri Hizmetleri Merkezi'ne gelip kendi dilinizde yardım isteyiniz veya 131 450'den Telefonla Tercüme Servisi'ni (TIS) arayarak onlardan 1300 722 542 numaradan Belediye ile ilişkiye geçmelerini isteyiniz.</p>
<p>Hungarian</p> <p>Amennyiben a levél tartalmát nem érti és segítségre van szüksége, kérjük látogassa meg a Tanácsház Ügyfél Szolgálatát (Customer Service Centre), ahol magyar nyelven kaphat felvilágosítást, vagy hívja a Telefon Tölmács Szolgálatot (TIS) a 131 450 telefonszámon és kérje, hogy kapcsolják a Tanácsházat a 1300 722 542 telefonszámon.</p>	<p>Czech</p> <p>Jestliže potřebujete pomoc při porozumění tohoto dopisu, navštivte prosím naše Středisko služeb pro veřejnost (Council's Customer Service Centre) a požádejte o poskytnutí pomoci ve vaší řeči anebo zavolejte Telefonní tlumočnickou službu (TIS) na tel. čísle 131 450 a požádejte je, aby oni zavolali Městský úřad Randwick na tel. čísle 1300 722 542.</p>	<p>Arabic</p> <p>إذا أردت مُساعدة لفهم هذه الرسالة، نرجوك الحضور إلى مركز خدمة عملاء المجلس واطلب المُساعدة في لغتك، أو يُمكنك الاتصال بخدمة الترجمة الهاتفية (TIS) على هاتف رقم 131 450 واطلب منهم الاتصال بالمجلس على رقم 1300 722 542.</p>
<p>Chinese</p> <p>如果你需要人幫助你了解這封信的內容，請來市政會顧客服務中心要求翻譯服務，或者與電話傳譯服務（TIS）聯繫，號碼是 131 450。請他們幫助你打電話給市政會，號碼是 1300 722 542。</p>	<p>Russian</p> <p>Если Вам требуется помощь, чтобы разобраться в этом письме, то, пожалуйста, обратитесь в Муниципальный Центр Обслуживания Клиентов и попросите оказать Вам помощь на Вашем языке или же Вы можете позвонить в Телефонную Службу Переводчиков (TIS) по номеру 131 450 и попросить их связаться с Муниципалитетом по номеру 1300 722 542.</p>	<p>Serbian</p> <p>Ako vam treba pomoć da razumete ovo pismo, molimo vas da dođete do Centra za usluge mušterijama pri Opštini (Customer Service Centre) i zamolite ih da vam pomognu na vašem jeziku, ili možete nazvati Telefonsku prevodilačku službu (TIS) na 131 450 i zamolite ih da vas povežu sa Opštinom na 1300 722 542.</p>