



**ANGEL PLACE
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SYDNEY NSW 2000**

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21 May 2021

Linley Love
Senior Development Assessment Planner
Georges River Council
Corner of MacMahon and Dora Streets
Hurstville NSW 2220

Dear Linley,

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION - DA 2020/0425

1. OVERVIEW

This letter has been prepared on behalf of the Scentre Group (**the Applicant**) in response to Council's request for additional information (**RFI**) dated 14 April 2021. A post-lodgement meeting was also held with Council and the external assessment planner (Think Planners) on 20th April 2021 to discuss the matters raised in the RFI.

Each item raised by Council has been individually responded to in the following sections. This letter is supported by the following documentation:

- Revised architectural plans prepared by Scentre Group – **Attachment A**;
- Traffic Response prepared by SLR Consulting – **Attachment B**;
- Urban Design Report prepared by Urbis – **Attachment C**;
- Height Variation Request prepared by Urbis – **Attachment D**;
- FSR Variation Request prepared by Urbis – **Attachment E**;
- Waste Response prepared by WSP – **Attachment F**;
- CPTED Report prepared by Urbis – **Attachment G**.

We trust that the information provided within this letter and supporting documentation will enable Council to continue to progress the finalisation of its assessment of DA 2020/0425.

2. TRAFFIC AND PARKING

Council engaged McLaren Traffic Engineering (MTE) to review the proposal. MTE have requested additional clarification regarding car parking and traffic generation. A response to each of the items raised in the peer review has been prepared by SLR Consulting and submitted at **Attachment B**.

In summary:

- The parking and traffic generation estimates were revised so that the calculations would rely on the GLFA instead of the GFA. This resulted in a significant increase in the car parking surplus of Westfield Hurstville Shopping Centre. The revised calculation also resulted in a decrease in the traffic generation estimates for the Thursday evening peak hour however a slight increase in traffic generation estimate was determined for the Saturday midday peak hour.
- It is expected that the proposed ELP will generate approximately 105 and 132 additional trips in the wider network during Thursday and Saturday peak hours. This equates to an approximate increase of 4% in the traffic generated by the existing Westfield Hurstville. It should however be noted that this is a conservative assessment due to the fact that a portion of the new customers of ELP will already be the existing customers of Westfield Hurstville. Furthermore, no passing-trade (drop-in traffic) allowances have been made to ensure a conservative assessment.
- It is expected that there will be a surplus of 568 parking spaces within the Westfield Hurstville car park compared to the minimum requirements of Council's DCP. Even with the proposed ELP expansion, Westfield Hurstville would provide a car parking supply that is 27% greater than the requirements of the DCP.
- Hurstville City Centre TMAP (2018) Action Plan recommends a range of improvements to public transport and active transport infrastructure in and at the surrounds of Hurstville. Given the achieved surplus of 568 parking spaces within Westfield Hurstville, in our view the provision of additional car parking would contradict the Action Plan recommended by Hurstville City Centre TMAP (2018).
- A revised swept path analysis for the rooftop is provided for a B99 design vehicle.

3. FSR AND HEIGHT EXCEEDANCE

Council Comment: *As you outline in the SEE submitted with the application, primary planning controls for this site such as FSR and Height are contained in the Hurstville DCP No 2 -Amendment No.5. These DCP controls restrict the FSR on the site to 2:1 and the height to 19m. The existing development has a FSR of 2.38:1 and a height of 2.46:1. The proposal seeks to extend these departures with a proposed FSR of 2.46:1 and a height of 31.27m. These departures are significant and are likely to be closely scrutinised by the planning panel.*

To further address these primary DCP departures it is considered appropriate that:

- *An urban design report be prepared that outlines why the additional FSR and height is appropriate and compatible with the existing and likely future building heights and FSR contained both in the DCP as well as for surrounding properties to which Hurstville LEP 2012 applies; and*
- *Clause 4.6 style departures be prepared that further outline the planning merits of why it is appropriate to vary the FSR and height controls in the DCP.*

Applicant Response: An Urban Design Report has been prepared by Urbis and submitted at Appendix C.

As outlined above, this DA seeks to vary the height of building and floor space ratio control prescribed for the site under *Hurstville Development Control Plan 2013 (HDCP 2012) No. 2 (Amendment 5) – Hurstville City Centre (HDCP)*. Ordinarily a Clause 4.6 Variation Request is prepared to vary a development standard contained within a local environmental plan.

In the case of the subject site, the height of building and FSR control is contained within HDCP. Strictly speaking a Clause 4.6 variation is not required where a variation to a DCP control is proposed.

Notwithstanding this, a precautionary variation request has been prepared for both the height and FSR variation in accordance with the objectives and framework of which a Clause 4.6 would ordinarily be prepared (**Attachment D and E**).

4. WASTE

Council Comment: Council's waste team have reviewed the proposal and request that the following clarifications be provided to ensure that waste for the ongoing use component of the proposal is appropriately managed.

Clarification as how wastes (general waste, commingled recycling, garden organics and bulky waste materials) will be transported to the central storage areas from each unit, ahead of collection;

Applicant Response: An updated Waste Management Plan has been prepared by WSP (**Attachment F**). Further detail of internal waste transfer and handling is provided in Section 4.3 of **Attachment F**.

Revised architectural plans that outline where and the size of litter/recycling bins will be located throughout the extension to adequately collect the material and prevent it from becoming wind-blown litter;

Applicant Response: Further detail of litter bin size and management is provided in Section 4.2.1 of **Attachment F**. The architectural drawings of **Attachment A** have been updated to include litter bin positions.

Revised architectural plans that illustrate the location of the digester on the scaled drawings – noting that the WMP outlines a Digester will be installed at the Level P5 waste drop off room, however this is not supported on any provided scaled plans within the WMP Appendix; and

Applicant Response: The architectural drawings of **Attachment A** have been updated to include the food digester.

The WMP makes reference in-text that there will be no changes to the storage within the Loading Dock 1 – however, in the WMP Appendix files, the scaled drawings include annotations for new grease arrestors. The applicant should confirm if changes are being made to Loading Dock 1 and ensure that the information on the scaled drawings corresponds with the information within the WMP plan.

Applicant Response: There will be no **functional** change in loading dock storage from an operational waste perspective. Any changes to loading dock layout (i.e., new grease arrestors) will not have any bearing on the waste systems outlined in this report. Collection methodology is discussed in Section 4.7 of **Attachment F**.

5. PLANNING PANEL BRIEFING

Council Comment: As you are aware the matter was briefed to the Sydney South Planning Panel on 11 March 2021. The briefing notes from this meeting indicate that the following needs to be addressed in the future assessment report:

The main issues are:

- *The height and FSR controls in the DCP that are exceeded. Relationship to context needs to be considered.*

- *Wayfinding and CPTED needs resolution, specifically wayfinding from the public domain, from the carpark and from the shopping centre to the new facility.*
- *Traffic, loss of parking and impacts on area needs resolution*
- *Materials and finishes and relationship to existing building to be considered*

To assist with addressing this as part of the future assessment report it is requested that:

- *The urban design report requests in point 2 further address wayfinding and the concerns outlined in section 15.3 of the pre-lodgement notes for the development.*
- *A CPTED report that expands on table 7 of the SEE be submitted; and*
- *The urban design report further comment on the proposed materials and finishes and outline why are they are compatible and appropriate for the extension.*

Applicant Comment: An Urban Design Report has been prepared by Urbis and submitted at **Attachment C**. The Urban Design Report includes an urban context analysis which considers the existing context and planning controls, recent planning activity, wayfinding and pedestrian connectivity, building massing, streetscape analysis, elevation strategy, materials and finishes, extent of visual change and shadow impacts.

A CPTED report has also been prepared by Urbis and submitted at **Attachment G**. The CPTED report expands on Table 7 of the SEE and has been confined to the matters raised by Council relating to security, CCTV, lighting, late night management and safe access to public transport and the taxi rank. The assessment has been prepared with consideration to Section 3.19 Crime Prevention Through Environmental Design of the *Georges River DCP 2020*.

6. CONCLUSION

We trust that the information within and attached to this letter will enable Council to continue their assessment of DA 2020/0425. Should you have any queries regarding this response or require anything further please contact me on 02) 8233 9970 or spurton@urbis.com.au.

Yours sincerely,



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