

File Ref: PRE2020/0078

4 August 2020

Scentre Group C/- Urbis Pty Ltd
Level 8, 123 Pitt Street
SYDNEY NSW 2000

cryan@urbis.com.au

Dear Charlotte

Subject: Pre – Lodgement Meeting
Application No: PRE2020/0078
Property: 3 Cross Street Hurstville
Proposal: Alterations and additions to the existing Westfield Hurstville Shopping Centre.

The purpose of this letter is to assist you in the preparation of a formal Development Application (DA). This advice is provided in relation to the issues and matters discussed at the pre – lodgement phone conference held on 2 July 2020.

The following architectural plans and documents were relied on in providing comments:

Description	Date received	Prepared by
Existing & demolition plan	3 rd July 2020	Scentre Group
Precinct plan	3 rd July 2020	Scentre Group
Proposed plan level R4	3 rd July 2020	Scentre Group
Proposed plan level R5	3 rd July 2020	Scentre Group
Community green space	3 rd July 2020	Scentre Group
Façade	3 rd July 2020	Scentre Group
Cross Street elevation	3 rd July 2020	Scentre Group
Façade materials	3 rd July 2020	Scentre Group
Perspective from Cross Street facing south	3 rd July 2020	Scentre Group
Perspective from Cross Street facing north	3 rd July 2020	Scentre Group
Perspectives – work in progress	3 rd July 2020	Scentre Group
Shadow studies	3 rd July 2020	Scentre Group

It is understood that the the preliminary concept design includes the following works:-

- Demolition of the existing entertainment and leisure precinct(ELP) to the west of the VMAX, which currently spans across Park Road;
- Removal of 62 car parking spaces;
- Inclusion of speciality retail, entertainment and food and beverage tenancies, including laneway dining, courtyard dining and destination restaurants;
- An indoor recreation area with ancillary amusement;
- Construction of a new 450m2 community garden and pergola at level 6, with the ability to be used for a variety of community purposes (such as yoga & Thai chi);
- Construction of new restaurant at level 6;

- Associated landscaping works;
- Relocation of cooling towers and extension of plant area (southern corner of the car park); and
- New lifts, services, amenities and storage areas;

Proposed hours of operation

The proposed new and extended ELP is proposed to operate from 7am to 12 midnight Monday to Sunday.

Proposed patronage

The new and expanded ELP, split over levels 5 and 6 is proposed to accommodate approximately 1,640 patrons, including those associated with the indoor recreation and ancillary amusement centre, the destination restaurants and the courtyard dining area.

The site & locality

The subject site (Westfield Hurstville Shopping Centre) is commonly known as 3 Cross Street, Hurstville and is legally described as Lot 1 in DP808463 and Lots 1 and 2 in DP610827. Whilst Lot 1 DP808463 and Lot 2 DP610827 are co-owned by Scentre Group and Dexu Wholesale Property Group, Lot 1 DP610827 is owned by Council.

The shopping centre spans across Park Road which runs in an east-west direction through the site. The site has an area of approximately 32,335sqm.

The proposed works are confined to Lot 2 DP 610827, located at the corner of Cross Street and Park Road, please refer to Figure 1. This area is currently constructed with the existing ELP (including pavilions, outdoor dining, children's play areas and amenities) to the west of the VMAX theatre, as well as services and associated car parking.

The existing building varies in height across the site but is predominately 5 levels. The site is bound by Cross Street, The Avenue, Rose Street and Crofts Avenue. Vehicle access to the site is available at various locations via Cross Street, Park Road, The Avenue and Rose Street. The site is accessible from the Hurstville train station via the Forest Road pedestrian connection or via the pedestrian ramp from Crofts Avenue. Various other pedestrian points.

The surrounding area is characterised by a mix of land uses, including commercial and retail. To the north-west of the site Club Centre Hurstville and the hotel accommodation at 6-8 Cross Street exists. Mixed-use retail, commercial and residential land uses exist to the north of the site, with a residential tower to the immediate north of the proposed development area. Lower density residential land uses to the north and east of the site, fronting The Avenue.

Planning controls

The subject site is located within land zoned 3(b) City Centre Business Zone pursuant to the provisions of Hurstville Local Environmental plan 1994 (HELP 1994).

Hurstville Development Control Plan 2013 No. 2 (Amendment 5) – Hurstville City Centre applies to the subject site (HLEP 2013).

The subject site is located within the Town Centre North precinct, specifically within Blocks 18A and 19A

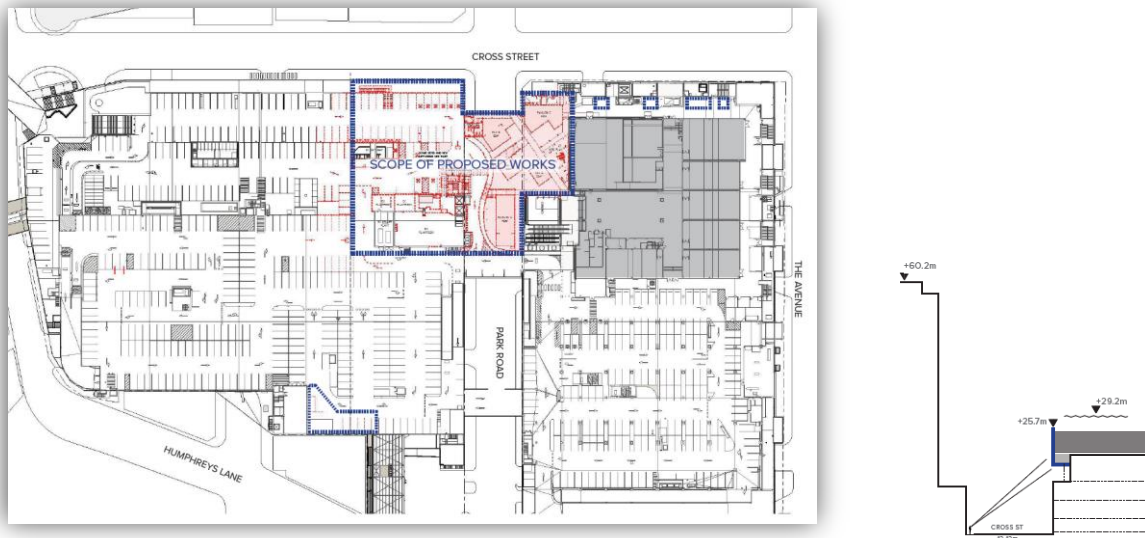


Figure 1: Proposed development site

Key issues

As explained during the pre – lodgement meeting the proposal is unlikely to be supported in its current form and as such requires amendments. Namely the key issues are:-

- Permissibility of proposed amusement centre;
- Development over Council road and need for owners consent;
- Clarification of proposed floor area;
- Provision of photo montage from certain viewpoints;
- Loss of car parking;
- Compliance with Hurstville City Centre Transport Management and Accessibility Plan;
- Safe, direct and accessible pedestrian path and way finding;
- Hours of operation;
- Amenity impact to adjoining and nearby residential uses;
- View loss;
- Impact of proposed cooling towers;
- Waste management;
- Environmental considerations such as water and air pollution;
- Bulk and Scale; and
- Urban design.

1.0 Permissibility

The proposal is considered to be permissible with Council consent with the exception of the proposed amusement centre component.

Definition of amusement centre means a building or place used, or adapted for use, for the operation, playing or viewing of –

- (a) *billiards, pool or other like games (whether or not by use of coin operated tables or equipment), but only if tables or equipment for more than 3 such games is installed in the building or place, or*

- (b) *electrically or mechanically operated amusement devices, such as pinball machines and the like, but only if more than 3 such machines are installed in the building or place, or*
- (c) *electronic appliances which are controlled or partly computer controlled and associated with one or more electronic screens operated by one or more players for amusement or recreation, but only if more than 3 such appliances are installed in the building or place,*

but does not include a building or place used for the primary purpose of providing general computer office and associated internet services and facilities.

Definition of recreation facility means a building or place used exclusively for a sporting activity, or exercise or for a leisure activity, whether operated for the purpose of gain or not, but does not include a building or place elsewhere defined in this clause.

It is understood that based on legal advice (only part provided) you are of the view that the proposed ELP use is for the purpose of 'recreation facility' having regard to activities across the ELP area as a whole and therefore your main argument is that it would be incorrect to characterise the proposed ELP use as being for an 'amusement centre' on the basis that a relatively small portion of the ELP area is intended to be used for electronic arcade games.

The legal advice further states that the amusement centre is an ancillary use and therefore, the prohibited purpose is subsumed by the permissible purpose.

In addition to the legal opinion, two planning reports were provided, one from Liverpool City Council and the other from City of Sydney Council. It is not clear as to whether the report considered by Sydney Western City Planning Panel (Liverpool City Council) contained any permissibility issues with the ELP as it seems that the main issues centred on height and car parking. In respect to City of Sydney report the proposal is located in a General Industrial zone and the planning argument was based on the view that the predominant use of the proposal is the bowling alley, and as such the planner was satisfied that the premises fits the use category as it will be used '*predominantly for indoor recreation*'.

Notwithstanding the above, it is considered that, based on the information provided as part of the pre – lodgement documentation, the proposed amusement centre component is not permissible within the 3(b) City Centre Business land use zone pursuant to the provisions of Hurstville Local Environmental plan 1994 (HLEP 1994) and is only permitted within Zone 4 (Light Industrial Zone).

With a view to resolve this issue it is suggested that the statement of environmental effects submitted with the formal DA (backed by a site specific legal opinion considering HLEP 1994) demonstrate that the proposed amusement centre component is permissible. In addition, floor plans should be provided indicating the exact area that will be used for electronic arcade games which may demonstrate that the area is relatively a small portion of the ELP.

2.0 Clarification of proposed floor area

Clarify is sought to the exact amount of proposed floor area. For instance in section 5.2 of the submitted planning report as part of the pre – lodgement documentation, a GFA of 2,526m² is indicated where as in section 6.1 of planning report a GFA of 2,310m² is indicated.

In this respect it is suggested that the following information be provided:

- Existing floor area of each level. Colour coded floor plans should be provided indicating car parking areas, commercial and retail areas, toilet facilities, loading areas and waste rooms. The floor area should be calculated based on definition contained in HLEP 1994;
- Floor area of existing ELP to be demolished; and
- Floor area of the proposed ELP.

The above information will assist to determine the required on site car parking and determine the overall F.S.R.

3.0 Construction over Council road

Please note that Clause 21 of HELP 1994 stipulates the following:

“21 Roads

- (1) A person may, with the consent of the council, carry out development on any part of a public road, or any other land shown uncoloured on the map, for any purpose which is permissible on land adjoining that road.*
- (2) Despite subclause (1), development of the land referred to in that subclause for the purposes of a public utility undertaking, or by the Roads and Traffic Authority for arterial road purposes, may be carried out without the consent of the council.*
- (3) Where any land shown uncoloured on the map is not under the ownership of the council, the owner of that land may, by notice in writing, require the council to acquire the land.*
- (4) On receipt of a notice referred to in subclause (3), the council shall acquire the land, unless the land might reasonably be required to be dedicated for public roads.*
- (5) The council may grant consent required by subclause (1), in respect of and which it does not own, only after it has considered—*
 - (a) the effects of the proposed development on the costs of acquisition,*
 - (b) the imminence of acquisition, and*
 - (c) the costs associated with the reinstatement of the land for the purpose for which it is to be acquired.”*

The statement of environmental effects is required to address clause 21. Particularly as the road is uncoloured on the zoning map (not zoned) it is considered that a part 5 assessment will be required.

Council's strategic property section has indicated that works over Council's land described as Lots 1 in DP816198 located at 3A Park Road, Hurstville (the air bridge), requires consent from Council as landowner.

It is suggested that the applicant contact Mr Bernard Morabito - Head of Council's Strategic Property on ph. 93306153 to seek clarification in respect to owners consent and any other lease agreements that may be in place.

4.0 Building height & floor space ratio

The maximum permitted building height for the subject site is 19.0m pursuant to HDCP 2013 controls. It is acknowledged that the existing built form ranges in height from 12.5m to 37.3m whilst the proposed height of the new works has a maximum height of approximately 32m.

Similarly, the maximum permitted floor space ratio (FSR) for the site is 2.0:1 pursuant to HDCP 2013 controls. It is acknowledged that the existing floor space ratio for the site is 2.39:1 and the proposed FSR is 2.46:1. The proposed additional GFA is indicated to be 2,526m² resulting in an additional FSR of 0.07:1

Variation to development controls will only be considered where written justification for each variation request demonstrates why the development control is unreasonable or unnecessary and that the objectives of the development control have been achieved and that there are no adverse impacts arising from the non-compliance.

Please note that any written variation request must:

- Identify the development control subject of the variation request;
- Identify the general and/or specific objectives of that control; and
- Demonstrate why compliance with the provisions of this DCP is unreasonable or unnecessary in the particular circumstances of the case.

The fact that existing development, both on the subject site and in the vicinity of the site may not comply with one or more of the development controls does not necessarily mean that the development control is unreasonable or unnecessary when applied to future development.

Please refer to urban design comments in section 15.0 of this letter. Council may use its discretion to consider a variation to the development controls only if it is satisfied that the proposed development has planning merit, appropriate urban design outcome and is consistent with the objectives of applicable planning instruments and development control plans.

5.0 Active Street Frontage

Westfield Shopping centre does not contribute positively to the streetscape or public life of the Town Centre for the reason that built form presents blank walls and pedestrian ramps to the street. One of the objectives of Town Centre North contained in section 3.3.23 of DCP is to remove the Westfield Shopping centre Ramp and to open up the Westfield Shopping centre and entertainment precinct to the street system and the rest of the town.

Consideration should be given to improving street activation.

6.0 Social impact assessment

Submission of a social impact assessment which:

- i. Investigates opportunities to maximise positive social impacts and identify negative social impacts with a view to develop mitigation or minimisation strategies and proposals;
- ii. Identifies cumulative social impacts, and the prevention or mitigation by the development of further exacerbation of existing negative impact; and
- iii. Identifies social impacts on special needs groups in the community in consultation with existing committees.

7.0 Economic impact assessment

Submission of an economic impact assessment (EIA) which:

- i. Identifies key economic impacts of the project—both positive and negative;
- ii. Estimates the project's economic impacts and identify measures to manage any negative impacts and capture the economic opportunities generated by the proposal; and
- iii. Identifies impact on local business and measures to manage any negative impacts.

8.0 Pedestrian circulation & accessibility

At present on the Hurstville side of the station, the majority of pedestrians move north through the existing internal routes directly towards Westfield Shopping centre. Figure 6 of page 26 contained in Section 3 of HDCP 2013 indicates that, a high percentage of pedestrian circulation is towards Cross Street originating from public transportation modes such as the railway station and bus interchange. Whilst there are multiple pedestrian entry and exit points to the shopping centre, it is considered that the primary pedestrian entry and exit to the proposed ELP is very likely to be via the pedestrian bridge along Crofts Avenue which is considered (in its existing form) to have several issues relating to safety, pedestrian comfort, wayfinding and accessibility. Please also refer to sections 14.0 and 15.0 in this letter.

In addition this section of Crofts Avenue is often busy with pedestrians and very difficult to access due to vehicle movements, gradients of footpath, width of foot path and the area having bus stops, taxi stops and delivery bays.

In this instance a pedestrian circulation and accessibility study should be undertaken demonstrating:

- Legible and accessible pedestrian circulation is available to the proposed ELP from destination points such as from railway entrances, public car parks, the bus interchange, bus stops and taxi ranks;
- The availability of more than 1 legible and accessible entry and exit point to the proposed ELP to avoid pedestrian traffic and provide variety and choice of convince; and
- The pedestrian path of travel/s to the proposed ELP provides adequate pedestrian amenity and well lit.

9.0 Community safety

The pedestrian circulation and accessibility study shall also provide details as to how pedestrian paths will be well lit and reduced opportunities for concealment.

It is not clear as to how the ELP will operate during after hours and which sections of the shopping centre including car parking will be open until 12 midnight. It is understood (from hours of operation displayed at the centre) that the centre is open until 6.00pm every day except Thursdays which is open until 9.00pm. How will, pedestrian and vehicular, access be provided to the ELP?

The wayfinding assessment shall also include details as to how pedestrians can gain access to the ELP through the day particularly after hours up until 12 midnight.

10.0 Amenity impact

Acoustic impact - Impact to adjoining and nearby development particularly residential is required to be addressed. The submission of an acoustic report prepared by a qualified and experienced acoustic consultant is required to be submitted with the formal DA submission.

View loss – need to demonstrate that residents in adjoining FRB do not experience view loss. Submission of a view impact study needs to be conducted to assess the extent of view loss to the units facing south above Level 5 due to the proposed increase in height.

Details of proposed cooling towers - Consideration must be given to location and noise generated from the proposed cooling towers to the surrounding neighbouring properties to avoid visual and acoustic impact.

11.0 Site services

It is suggested that site facilities are effectively integrated into the development and are unobtrusive and do not impact on street presentation. Details and location of the following be provided with the architectural plans:

- Waste removal and recycling - Storage and Collection;
- Fire Service and Emergency Vehicles;
- Loading docks to service the expansion; and
- Electrical Services (substation).

12.0 Traffic

Submission of a detailed traffic and parking impact study outlining the parking demand that would result from the proposed development is required.

The applicant will need to justify how the 60 car parking spaces that is proposed to be deleted is excess on site parking spaces taking in consideration the parking demand of the existing traffic generating retail GFA as well as the additional proposed traffic generating use that will result from the proposed development.

Any changes to entrances or exits to the Westfield development will also need to be addressed in the traffic impact study.

Please also note that the Hurstville City centre Transport Management and Accessibility Plane is required to be addressed. The plan can be accessed via the following link.

<http://www.georgesriver.nsw.gov.au/Development/Planning-Controls/Planning-Strategies-and-Studies/Hurstville-City-Centre-Transport-Management-and-Ac>

12.1 Car Parking

The Hurstville CBD already discounts the requirement for on site commercial car parking.

The following parking rates apply:

- Commercial 1/50 m² (CBD only, 1/40 m² elsewhere).
- Retail 1/25 m² (CBD only, 1/28 m² elsewhere).
- Restaurants 1/6 m² dining/bar area.

In the event the required on site car parking cannot be provided Section 7.11 Contributions can be made to Council per deficient parking space. Current Indexed Contribution Rates June Quarter 2020 for non-residential development in Hurstville City Centre is \$56,381.87 per deficient parking space.

Please note that section 7.11 contribution rates are subject to indexation. The contribution amount changes quarterly.

Whilst Section 7.11 contributions can be made for deficient on site car parking spaces, the applicant will need to justify the deficiency by the submission of a detailed Traffic Impact Study addressing the impact of the development.

12.2 Proposed changes to taxi rank

During the pre – lodgement phone conferee it was indicated that the existing taxi rank will be replaced with a pedestrian crossing along Cross Street. There will be a taxi rank across the road, outside the Hotel that is currently being built as part of the catholic club extension at 6 Cross Street Hurstville. Ideally pedestrians who exit Westfield at cross Street will be able to utilise the pedestrian crossing, to safely cross to the other side of Cross Street to the taxi rank.

In addition, the existing green shelters outside the taxi rank are also likely to be removed.

13.0 Environmental considerations

13.1 Noise Control

Consideration must be given to noise generated from the proposed use to the surrounding neighbouring properties. An acoustic assessment from a suitably qualified acoustic engineer/consultant is to be submitted with the DA to ensure the proposal complies with the Protection of the Environment Operations Act 1997 and Noise Policy for industry (2017) – NSW EPA.

The assessment is to also consider hours of operation and noise generated from proposed plant/equipment used on site.

13.2 Cooling towers

The Public Health Act 2010 requires that all cooling water systems are registered with their Council due to the potential risks associated with Legionnaires disease. It is proposed that existing cooling water towers will be relocated. This is to be detailed in the DA demonstrating compliance with the Public Health Act 2010, Public Health Regulation 2013 and Public Health Amendment (Legionella Control) Regulation 2018.

In addition, noise generated from the new location of the cooling water towers must comply with the Protection of the Environment Operations Act 1997 and the Noise Policy for Industry (2017) - NSW EPA in relation to noise.

13.3 Water pollution

Any unclean water as a result of maintenance of the community garden needs to be appropriately disposed of such as not to result in water pollution. Information relating to the stormwater drainage details is to accompany the DA. Any polluted waters resulting from maintenance of the community garden needs to be disposed of to the sewer.

If alternative water management and disposal options are proposed (i.e. where water is recycled, minimised or reused on the site), detailed plans and specifications of the water recycling system is to accompany the application.

13.4 Air pollution

The use of the premises should not result in air pollution. In addition, the use of the premises must not cause odour or smoke emission which is likely to impact negatively on neighbouring properties, particularly the nearby residents. This also includes odour from waste generated from the proposed use. All potential odour nuisance resulting from the use of the community garden must be addressed in the formal DA submission.

13.5 Waste management

Detailed waste management plan demonstrating the provision of adequate waste storage facilities to house additional waste generated from the proposed use. Waste considered should include putrescible, general, recyclable and green waste.

14.0 City Strategy and Innovation

Council's vision for Hurstville is: *Hurstville plays to its own beat as a proud showcase of local culture for a growing yet connected community. The city is brought to life through authentic and creative places and is celebrated as a green, accessible and innovative city.*

14.1 Place Strategy

A comprehensive Place Strategy has been developed, refer to link below – Council's desired outcomes includes:

- i. Being safe and easy to get around;
- ii. Celebrating diversity and being inclusive for everyone;
- iii. Becoming a destination for locals and visitors with a positive reputation;
- iv. Attracting investment and jobs with an innovation mindset;
- v. Being led by collaborative, strong relationships between key stakeholders;
- vi. Being known for exciting events, activations and a thriving night time economy; and
- vii. Promoting a high quality of life.

<https://yoursay.georgesriver.nsw.gov.au/draft-hurstville-place-strategy>

Council has progressed this strategy to commence design work for the conversion of Palm Court Car Park to public open space with elements of play as well as a revitalized Forest Rd Precinct to slow traffic and encourage pedestrian movement and places for people to rest.

14.2 Strategy considerations

With these investments from Council it is vital that the following is incorporated into the scheme:

- i. The development should be more outward focused supported by active street frontage to complement the overall revitalization of the CBD and complementing the vibrancy the roof top will create;
- ii. The entry/exit points to the proposed entertainment and leisure precinct (ELP) in its current form has several issues relating to safety, pedestrian comfort, wayfinding and accessibility, please also refer to section 15.0 of this letter. The entry from the pedestrian bridge along Croffs Avenue is through a flight of stairs that then opens onto to open air car park. To mitigate this consideration should be given to the provision of safe and accessible pathway lined with plants to access the entertainment precinct. The first impression from this entrance should be elevated to reflect the overall expected experience. This will assist Scentre Group meet the aspirations of improved connections.
- iii. The community garden is a great opportunity for residents and visitors to experience green open space in a CDB environment. The space should include small elements of play and be suitable as a hireable community activation space.

15.0 Urban design

The key urban design issues relate to bulk and massing, building appearance, accessibility and associated view impacts as summarised in the comments below.

15.1 Bulk, scale and proportions

The built form proportions are considerable and result in a visually dominant form that is not well integrated. The box-like architecture of the proposed additions on levels 4 and 5 adds to the perceived bulk. The effort in articulating the façade into two modules are noted, however, the insertion of a mass that is not well integrated but rather placed 'on top' of the unchanged centre below it is not ideal as seen in the Cross Street elevation. The horizontality of the massing in combination with its lack of integration to the existing building proportions exacerbates this.

As seen in the perspective from Cross Street facing south, the proposal provides nil-setbacks to the street edge despite the setback alignment of the adjacent facade, further adding to the bulk. Additionally, the 4th level along Cross Street is partially cantilevered which adds to the monolithic appearance of the new part of the building. This monolithic building profile will be visible from several vantage points along Cross Street and Park Road due to the topography of the site.

The existing shopping centre currently has a continuous secondary setback of approximately 4m along Cross Street. The proposal needs to maintain this setback and alignment to the west and this would assist in reducing the perceived bulk of the proposal from the public domain and it will also improve the streetscape presentation.

The approach the applicant has taken is to envisage the extension as an alien form on top of the existing centre. We do not consider this is an appropriate approach. To extend the centre further the building needs to be considered as a whole and the applicant should look at facade improvements for this part of the building (at the very least extending to the ground level and along this part of the building) to create an integrated facade treatment that enables the extension to blend into a whole composition.

The existing centre has a very poor facade presentation and fragmented massing due to the unrelated extensions and architectural approach of the building overtime. It is not appropriate to continue that approach for any new works, particularly work that exacerbates existing non compliance's.

We note that the existing height control for the site (Hurstville DCP) is 19m. The existing shopping centre exceeds this height limit by approximately 6m and the proposal further exceeds it by approximately 10m, thus exacerbating the non compliance. To justify the increase in height, the applicant needs to provide additional information on the public domain improvements and greening of Cross Street.

15.2 Building appearance

The variety of materials and colours used, as seen in the Cross Street elevation further fragments the elevation and does not relate to any existing materials. New and interesting materials can be considered but should be applied to more than just the new portion of the building. It is also a poor approach when only blank facades are proposed rather than seeking to activate the facades to the street edge to improve its relationship and response to the streetscape.

The attempt to provide limited windows/openings of varying geometry is appreciated. However, the use of different geometries results in a façade that is not visually cohesive. The form of the massing also tends to lack imagination, presenting as a standard box form rather than looking at opportunities to develop a more dynamic and imaginative form that also extends to improve the building frontage to Cross Street.

15.3 Access and wayfinding

The entry/exit points to the proposed entertainment and leisure precinct (ELP) in its current form has several issues relating to wayfinding and accessibility. The entry from the pedestrian bridge along Croffs Avenue is through a flight of stairs that then opens onto to open air car park. The walk from the landing of the stairs to the entry point of the proposed ELP is approximately 70m long within a car park devoid of any character, pathway or shading devices. The absence of a dedicated pedestrian pathway for the users during peak hours will lead to conflicts between vehicular and pedestrian movement resulting in safety issues. It also results in a diminished sense of direction and is not universally accessible.

The proposed new lifts at the centre of the ELP do not have connectivity to the publicly accessible spaces of the shopping centre as it opens into the car park. There appears to be no straight forward and direct access from the shopping centre making it difficult for the users to locate the entry/exit point. This access point will therefore discourage awareness of the retail offering within the centre or from the public domain.

Access from the escalators at the food court level leading up to the cinemas is not wheelchair accessible and wayfinding still remains an issue as this access point can only be identified once the user is at the food court level.

The access routes need to be further explored and opportunities to open up and reconfigure the centre to improve legibility and wayfinding and universal accessibility need to be identified. More information on the visual permeability of the connection to ELP is required including measures to improve the wayfinding for the users when they are in the shopping centre.

15.4 View impact analysis

It is noted that a perspective image has been provided from the pedestrian bridge. However, this view is not sufficient to assess the visual impacts to the surroundings, given that there have been significant improvements to the public domain around the shopping centre with the future desired character of Cross Street aiming to support pedestrian activity. In addition to the view from the pedestrian bridge, we think that it is crucial to assess the proposal and its impacts from additional vantage points. These should include:

- a. Views from the Hurstville plaza;
- b. Street views along the northern footpath of Cross Street; and
- c. Street views along the eastern footpath of Park Road and at the junction of Park Road and Woodville Street.

A view impact study also needs to be conducted for the units in the building located at Nos. 25-35 Park Road to assess the extent of view loss to the units facing south above Level 5 due to the proposed increase in height.

15.5 Landscaping

The applicant has not demonstrated how the proposed landscaping along the edges of the building facing Cross Street is going to be accessed and maintained. Additionally, there are

no details provided for the landscaping works proposed on Level 5 (community green space). A detailed landscape plan should be provided to demonstrate the treatment, quality, maintenance as well as deep soil provisions of the landscaped areas.

15.6 Conclusion

The proposed ELP needs to be a 'jewel' that seeks to improve the presentation to the street and the architectural expression of the existing shopping centre. However, as identified above there are several issues relating to the bulk and scale, accessibility and building appearance and the applicant should be given an opportunity to address the issues stated above before any consideration for approval.

16.0 DA Submission Requirements

In addition to documents/information required in this letter, the following documents are also required to be submitted as part of the formal DA submission:-

Plans & Drawings	
Site analysis plan	Site plan
Survey plan	Floor plans- existing and proposed
Elevations & sections	Shadow diagrams – existing and proposed
Stormwater drainage concept plan/OSD	A4 Size notification plan
Streetscape character analysis	Schedule of colours & external finishes
Photo montages	GFA & building height certification
Landscape plan	View impact analysis
Colour coded GFA calculation plans	View impact study
Supporting Documentations	
Statement of environmental effects	Wayfinding
Pedestrian analysis study	Wind report
Fire safety schedule	Waste management plan
Construction management plan	Access report
Social Impact assessment	Acoustic report
NCC (BCA) Report	Structural engineers report
Traffic and parking assessment report	Economic Impact assessment
Crime risk assessment	

Conclusion

A preliminary assessment of your proposal has identified a number of issues that should be addressed prior to lodgement of a formal DA. However you are not obligated to make any of the suggested design changes if you do not wish to and as such you may lodge a DA as proposed per the pre – lodgement submission or a variation. Please note once a formal DA is lodged a merit assessment of the application will be made based on the submitted information.

Please note that the proposal if submitted in its current form is unlikely to be supported and therefore it is suggested that you resolve the issues before it is formally lodged. If the proposal is not reasonably close to what council would be prepared to support, the application is likely to be refused. You would then need to lodge a new application and pay new fees.

Please note that Council will not accept incomplete, insufficient or poor quality submissions and therefore will return submissions to the applicant. Once a DA is formally lodged with the required documentation, Council operates on the assumption that the application submitted

is complete and final and you propose to undertake the development precisely as described and as such Council will not entertain any further amendments.

All efforts have been made to identify issues of relevance and likely concerns with the preliminary proposal. However the comments and views in this letter are based only on the plans and information submitted for preliminary assessment and discussion at the pre – lodgement meeting. You are advised that:

- The views expressed may vary once more detailed plans and information submitted and formally assessed in the DA process, or as a result of issues contained in submissions by interested parties;
- Amending one aspect of the proposal could result in changes which would create a different set of impacts from the original plans and therefore require further assessment and advice;
- The information provided is in accordance with the environmental planning instruments and development control plans that were current at the time of the pre – lodgement meeting. It is the applicant's responsibility to check whether there have been any amendments, repeals or alternatively if any new instruments or policies have been adopted by the date of DA lodgement.
- The comments do not bind Council Officers, or other bodies, in any way whatsoever.

Should you require additional information please do not hesitate to contact me during normal business hours on 9330-6095.

Yours sincerely



Atalay Bas

Team Leader- Development Advisory Services