14 July 2023

FAIRFIELD CITY COUNCIL

DA303.1/2022- STAGE 2 REDEVELOPEMENT OF VILLAWOOD TOWN CENTRE AT 2 KAMIRA AVENUE, VILLAWOOD

I refer to the Council's requests for additional information correspondence regarding the above mentioned application. Amended plans and documents have been prepared in support of the application that seeks to address and resolve the issues.

This submission deals with the correspondence from Council dated 22 February 2023, 10 March 2023 & 17 March 2023.

The proposal has undergone amendment to alter the scheme to respond to the matters considered appropriate. This letter sets out in turn the issues raised by the Council and provides a corresponding response.

Importantly, this letter is supported by a number of expert reports and commentary. In particular the DKO design package entitled "RFI – Urban Design Report" is to be read in conjunction with this letter.

22 FEBRUARY 2023 RFI

Provision of social housing

Traders in Purple and LAHC continue to review the way the apartments will be sold, leased or held by a community housing provider. Notwithstanding the Applicant's position that the assessment of social housing allocation is not a requisite for this DA assessment. Traders in Purple are still exploring options for the provision of additional affordable housing to be provided in both Stage 1 and Stage 2 developments. This includes, for Stage 1, exploring opportunities with the existing NHIF SAH program and the opportunity for a CHP to take-out the ownership of 80 additional apartments. Also, for Stage 2, this project offers the opportunity for further affordable housing to be provided under the HAFF scheme in future.

The final arrangement has yet to be determined and will be articulated to the Council and Planning Panel in the future. The position is maintained as it was posed for the Stage 1 assessment: that the 30:70 social housing should not be a criterion to withhold the approval of 222 apartments supply to a market that has a demand for this housing. Traders and LAHC are working in good faith to utilise the government schemes available to supply a mixed tenure to both staged developments.

Urban Design

1. Site Analysis

The DKO design pack provides an updated Site Analysis Plan that includes an understanding of the site in relation to the Villawood town centre, surrounding residential built form, the Railway Line and the adjoining Stage 1 approved development.

The Design Pack should be read as a whole as it also includes important site contextual analysis regarding traffic movements, connectivity, pedestrian movements, vehicle access points, etc.

The Design Pack includes in its contextual analysis a series of shadow diagrams that investigates the impact, if any, of shadows from the proposal upon the R4 zoned land to the west. This site analysis confirms that there are no shadow impacts to the existing built form west of the site.

Further, the DKO pack also explores the other surrounding developments including 2 Kamira Court, Stage 1, as approved, as well as other adjacent buildings, and shows the achieved solar by each of the buildings to demonstrate compliance. This shows that the Stage 2 buildings will not adversely impact surrounding open spaces, public land, and private developments.

The Design Pack read as a whole provides excellent contextual and site analysis.

2. Building Design

Following the project teams review of the letter and the subsequent meeting with Councils urban design advisor, the proposal has been amended to respond to the issues raised. The amendments are identified in the Design Pack and include:

- Removal of the child care centre from the proposal and introducing ground floor residential apartments that front the open space and Kamira Court, introducing passive activation and direct all day overlooking of these public spaces. The medical uses have been relocated and reconfigured to address the north south pedestrian link. The introduction of neighbourhood shops to serve the day to day needs of the local community.

- The introduction of a residential lobby to Villawood Road in Building C, providing greater activation to this frontage and enhancing the identifiable destinations and entrances to Building C. The lobbies are also expressed with feature entries as referenced throughout the Urban Design Report to show the hierarchy of entry.

- Each of the built forms have been reconsidered and architectural amendments made to refine their form and appearance in response to matters raised by the Council and its experts. The buildings have their own character, grounded uniquely, with separate and distinct lobbies, varied architectural expression and

roof designs. Each building is individually identifiable. The material selection is intentional and comprises a focus on tactile robust materials forming a solid base to the buildings with the implementation of brickwork particularly. The upper levels comprise a character of less mass to ensure that the materials vary and contribute to an articulated and varied form.The Podium of Building A has been amended to respond to Councils comments inclusive of podium articulation, materials, rounding of the corners, and ground floor details. The podium is now presented with horizontal and vertical articulation through the emphasis provided at the south western corner, fronting the open space. Noting that the podium has a variation in its height thereby providing a variety in the upper level of the podium.

- Podiums on both Buildings A & C are also connecting to the ground through bringing materiality down to the ground plane.

- Significant design attention has been made to the pedestrian experience with respect to definition and design of lobbies, entrances, and circulation spaces. Refer to the Design Pack that illustrates the response in relation to residential lobbies and the main supermarket entry. The materials in the podium are intentionally of a robust nature comprising brick and concrete looking finishes, that ground the building in the streetscape and adjacent to the open space. The materials in the upper levels of the building provide an intentional juxtaposition to the podium and no variation to the materials of the upper levels is considered necessary nor appropriate.

- Having regard to the location of Building C, the design intentionally fronts the boundaries of the site to ensure activation and overlooking of the public domain (street and park and through site link). The ground level apartments are suitably kept private through ground level planting and setting back living areas from the public open space, continuing the treatment as was used in the residential ground level terraces of the approved Stage 1 application.

- The proposal provides open space in a form of deep soil at ground level (as shown in the Design Pack), rather than on top of the podium. Having regard to the sites adjacency to the business zone, landscaping is provided by multiple above ground communal open spaces and direct access to the 3,000 sq.m. public park.

3. Connectivity

The Design Pack responds in turn to the matters raised and confirms visually the removalist routes, pedestrian movements and floor levels.

The Design Pack effectively shows the relationship between both buildings and their connectivity to the surrounding public transport network. This connection with the retail is also shown throughout both buildings and their adjoining north-south and east-west activated pedestrian links.

For private residential uses, mailboxes will be located in a single lobby for each building given that a single location of drop off is generally a requirement from Australia Post. However, if Australia Post allows for a separation of mail boxes in future enquiries, then during the design development of the project, the mail boxes will be separated into other lobbys to ensure minimal transit from an apartment to mailbox. Lobbys are large enough to incorporate these mailboxes and this will be developed further for the construction certificate plans. Australia Post which will gain access from Villawood Road and Kamira Court respectively for each building. This also provides proper opportunity for building and apartments to be addresses to these streets.

It's noted that approaching the western lobby of Building C from Villawood Town Centre may require to cross a number of driveways fronting Villawood Road. However, alternate routes for pedestrians are offered through the north-south and east-west pedestrian links, which also have covered awnings and present a nicer pathway of connectivity aesthetically. The loading dock driveways will be sparsely used during peak pedestrian traffic hours, hence making interruptions a rare occurrence. Further, it's considered that allowing the Building C lobbies to connect to Villawood Road is an overall better outcomes for activation and connectivity. Building A will not have a pedestrian connectivity challenge given that the lobbys open to the pedestrian links and Kamira Court for good connectivity in all directions, whilst vehicles will use the Villawood Road entries, separated by a residential and non-residential driveway to avoid congestion on the entries.

Removalist vans will utilise the loading bays on Building A and C. These will be booked through the building manager and outside of waste collection times. The loading bays and turn tables are sized to adequately fit these vehicles.

It is shown that the building residential and retail uses are effectively connected in this new design concept.

4. Street Activation

The removal of the child care centre that previously fronted Kamira Court and the public open space resolves the concerns of Council in relation to the edge treatments. The introduction of ground floor residential apartments provides all day passive surveillance and activation of these edges. Ground floor apartments are designed to front these edge spaces and provide direct connection through skilfully designed entry and landscape spaces. The ground floor apartments provide a slightly elevated private open space area to aid in passive surveillance of public places and privacy protection to the apartments. The Design Pack illustrates an increase in the amount of activation at the edge of the two built forms on the ground floor. The lobbies have been reconfigured to ensure that there is improved activation to Villawood Road, noting that this will be one of the pedestrian routes to and from the railway station. Further, the relocation and adjustment of these new building lobbies now presents a clear opportunity for a prominent street address to Villawood Road and Kamira Court.

5. Building Separation Distances

The Design Pack sets out the compliance of the separation distances where the north-south link is located. It is important to note that the separation is 12m and the exceptions relate to small projections of balconies that provide articulation and relief in the façade. The majority of the balcony spaces are 12m or more from opposing built form, with the minor projections being the exception.

Where Council has identified in Buildings A and C a few apartments where windows are in close proximity, the Design Pack illustrates a response that ensures privacy is achieved, while light and ventilation is maintained. This is achieved through the use of high level windows and screening where required at each interface.

It is considered that in all building interfaces between Buildings A, B, and C that all light and ventilation and be achieved whilst maintaining privacy of future occupants.

6. Private Open Space

The plans are amended to illustrate the size of balconies. The level 3 apartments which front the communal open spaces have had their POS increased in size to the 15 sq.m. requirement as detailed in the Design Pack.

Air conditioning condenser units have been shown on balcony locations where relevant in order to free up roof space for solar panels (a superior sustainability outcome). It is noted that, as for Stage 1, this does affect the area of POS to these apartments, but it is permissible to be approved as long as they are not visible from public spaces. The area has been demonstrated to be usable as future POS area by incorporating non-climbable A/C covers which can be used for other uses.Unit/Room Size and Dimensions

7. Unit/Room Size and Dimensions

The plans are amended to demonstrate that the Unit and Room sizes are compliant with the ADG.

8. Solar Access

The Design Pack illustrates the solar access compliance of Buildings A and C. The Design Pack also illustrates the permissibility of solar availability to adjacent buildings such as Building B to the south, 1 Villawood Place to the East, and 8 Howatt St to the south-east. This is shown in the Overshadowing section of the Design Report which demonstrates a minimum of 2 hours sunlight to these apartments by giving the times of day that solar is available.

As such, the Stage 2 and Stage 1 apartments are all passing the solar requirements in this building form.

9. Cross Ventilation

Reference is to be made to the attached analysis of Cross Ventilation that confirms that the proposal meets the requirements of the ADG. The annexed report from SLR consultants supports the cross-ventilated units as proposed in the Design Pack. This report supports an additional unit on the south-west corner of Ground level, Building C. Hence, the proposed cross-ventilated units proposed by the architecture pack is supported by a wind engineer as compliant.

10. Awning

Awnings have been incorporated into the design to provide appropriate weather protection. These awnings are vastly continuous where it has been possible to do so. Where awnings have briefly been discontinued, this is due to balancing the ground level architectural expression and the specialised residential and retail entrances to the site. Breaks in the awning are brief. And considering the overall effect of the podium expression at a human scale – it's considered that providing awnings on both sides of any given pedestrian link, but with some breaks, is an overall better outcome for the developments and future owners, shoppers, and visitors alike.

11. Pergolas

The plans have been updated to show pergolas and are consistent with the landscape plans.

12. Sustainability Measures

Sustainability has been considered throughout the design development of the project and comprises a suite of passive and active measures. This includes:

- Compliance with relevant ADG requirements regarding solar access and cross ventilation. Noting that the proposal provides less than the permitted 15% of apartments receiving no solar access.
- The buildings A and C collectively out-perform the regular BASIX compliance. With projects achieving the following scores:
    - Water Target: 40. Water Building A & C Project Score: 46
    - Energy Target: 25. Energy Building A & C Project Score: 40
- Water Sustainability Measures to achieve the above score:
    - The project incorporates indigenous planting throughout the development which include water hardy species.
    - Provision for 5-star fixtures throughout the kitchen and bathroom of all apartments

- A central water tank of 320,000L for grey water re-use throughout the building for irrigation of the communal open space areas

- Energy Sustainability Measures to achieve the above score:

  - A photovoltaic system of 100.0 peak kW power supply to the building's common area electrical system requirements

  - Centralised hot water system providing all apartments hot water needs;

  - Primary lighting source throughout all building common areas are to be low-energy consuming LED systems

- Incorporation of electrical vehicle charging stations in the building (number is TBC) and with building 'provision for' electrical charging stations to be installed in all car spaces.

- Use of materials that are robust and require less maintenance over time including minimising any external painted surfaces where possible throughout.

- Development of a mixed use precinct that will serve the needs of residents and thereby reduce vehicle trips and reliance upon transport to have access to services and facilities such as retail shopping, medical centre, access to public open space, etc.

- Introduction of street trees and landscaped spaces, including a 3,000 sq.m. public park, across the site and adjoining public spaces, thereby reducing the urban heat island affect. 59% of the total surface area of the development will be green space provided by public open space or building COS.

- Proposing the delivery of park items such as equipment and planting selection to be sustainable from a maintenance and replacement perspective. This has been achieved by liaising extensively with Fairfield Council stakeholders on the park inclusions.

- Providing over 450 sq.m. of indoor community space over 2 stages which will be provided to a community partner such as Woodville Alliance, to provide programs such as learning, dancing, teaching, and recreating spaces. Thus contributing towards improving the social outcomes of Villawood community.

Car parking

13. Podium Parking

The deep podium forms of the proposal are an appropriate location for above ground parking. As set out in Councils correspondence the majority of the above ground parking is sleeved, as is sought in the DCP.

Where the parking is not sleeved, the southern elevation of Building A and south-west elevation of Building C, the Design Pack illustrates the architectural treatments that have been further enhanced to ensure that the presentation has architectural merit. The Design Pack illustrates the relevant method of sleeving, the materials proposed and includes perspectives to better understand the final finish and design.

14. Number of spaces provided

The shortfall in parking spaces is justified having regard to the proximity of the site to public transport links and town centre. As described in 12.4.1 of the Fairfield DCP exception to the parking provision is acceptable if the aims of the DCP can be satisfied. The DCP described as follows;

> "*In those instances where the applicant can demonstrate that the use/activity will generate a demand for parking outside those times when peak demand is likely to be expected (for example, restaurant peak time and retailing peak times rarely coincide) Council will consider variations to the requirements of this DCP.*
>
> *Similarly, if it can be shown that the requirements of this DCP are excessive Council may vary its application. The validity of the applicant's argument must be demonstrated by presentation of relevant data and practical examples of comparable situations.*
>
> *The provision of nearby public car parking and the type of transport used to gain access to the premises, along with car ownership rates amongst users, will also be considered as mitigating factors in determining appropriate parking rates. In shopping centres, customers may patronise a number of shops during their visit and thus parking required may be less than this DCP might otherwise necessitate. Consideration of this argument by Council will mean the applicant will need to submit a parking accumulation/turnover study with their proposal."*

It is noted that child care has been removed from the proposal and no parking requirements arise.

The breakdown of car parking is provided below.

Non-residential Uses Parking

See the Design Report for detailed tables on the proposed and required parking as outlined in architects plans. Detailed calculations are provided below.

Building C Medical Centre + Health Services Facility : 545sqm containing 8 consulting rooms. 3 spaces per consulting room over 8 rooms (RFI letter) = 8 x 3 = 24 spaces

Building C Retail as neighbourhood stores: 1 space per 40 sq.m. over 76 + 75sq.m. = 151 sq.m. = 4 spaces

Building C non-residential = 28 spaces

Building A Retail Supermarket : 1 space per 40 sq.m. (RFI letter) at 1147 = 1147 / 40 = 29 spaces

Restaurant and café: 1 space per 25 sq.m. gross (RFI letter) over 519 sq.m. = 21 spaces

Specialty retail : 1 space per 40 sq.m. gross (RFI letter) over 662 sq.m. = 17 spaces

Community Facility : 118 sq.m. at 1 space per 40sqm = 3 spaces– which is further justified in subsequent sections of this letter

Building A non-residential = 70 spaces. Required by the demand of the non-residential of new scheme.

TOTAL BOTH BUILDINGS NON-RESI. = 98 spaces. Required by the demand of the non-residential of new scheme.

Therefore, the required parking and proposed parking is aligned with Council's DCP rates.

Residential Uses Parking

The following statement is an excerpt from the original Traffic Report submitted in support of this application:

As per the NSW Department of Planning and Environment's Apartment Design Guide July 2015,

- *If the development is within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area, the minimum residents and visitors car parking rates specified in either RMS Guide to Traffic Generating Developments or the car parking requirement prescribed by the relevant Council can be used, whichever is less.*

Noting that the proposed development site is located within 500 metres of the Villawood Train Station, the lessor residents and visitors parking rates specified in Section 5.4.3 of the RMS Guide to Traffic Generating Developments (2002) were applicable. The RMS Guide's minimum parking rates for High-density residential flat buildings are:

- *0.4 spaces per 1-bedroom unit.*
- *0.7 spaces per 2-bedroom unit.*
- *1.2 spaces per 3-bedroom unit.*
- *1 space per 7 units (visitor parking).*

Notwithstanding the above, it is noted that the latest RFI letter from Council has requested to apply Council DCP parking rates for comparison. A comparison table has been provided in the Urban Design Report from the architect.

This table shows that the proposed residential parking of the new proposal is in exceedance of these RMS requirements, and it is also in excess of Council's DCP requirements for the residential dwellings.

There is a minor non-compliance specifically with the DCP in that of residential visitor spaces. Whereby the rate of 1 visitor space per 4 dwellings is not achieved. However, the provided residential visitor spaces complies with RMS Guidelines for Buildings A & C of 1 space per 7 dwellings. Further,

It is considered that given the large retail component of the project and publicly available parking for this use, it will provide suitable additional parking for future users if this situation ever occurs in future. Given the peak traffic generation rates of retail uses it shows that the retail parking will have additional capacity for users if required.

Further, the total residential spaces provided by both buildings A & C exceed the total residential spaces required by both the DCP and the RMS Guidelines. Therefore, it's requested that Council in their review exercise their right to approve the parking configuration as proposed in this scheme.

Finally, it is noted that the proximity of the site to Villawood Railway Station leads to the challenge of the commercial carpark being inappropriately used for commuter parking. The applicant does not propose to accommodate any commuter parking and to ensure that this is avoided it is intended that the commercial carparking be provided free of charge for a certain period of time, and after that period of time has expired, paid parking will be required. This will ensure the proper use and functioning of the commercial carpark on site.

15. Tandem Parking Arrangement

Where tandem parking spaces have been provided it is confirmed that these are for a single apartment only (the 3-bed apartments). Therefore, these tandem spaces will remain on a single strata title and used by a single household – thus, removing any issue of future management or clashes between users.

16. Communal Open Space

Communal Open Space has been amended in the revised submission and the development will provide 5,549m2 or 50 % which well exceeds the requirement of the Fairfield DCP. The communal open space is provided in a number of ways across the site that facilitates a wide range of recreational uses and directly contributes to residential amenity. This includes not only communal open space only available to building future residents, but also over 2,800 sq.m. of public open spaces for the enjoyment of residents, visitors, and the broader Villawood community. This is considered a superior outcome for the development and exceeds both the ADG and DCP requirements when including these areas.

Additionally, the development provides 940m2 or 9% of Deep Soil Area which again exceeds the minimum required deep soil area stipulated by Fairfield DCP. Placing deep soil planting on the COS of upper building levels introduces many design and construction challenges given the large structural loads from soils and trees. These require additional structural slab thicknesses and column volumes which overly increase the size/height of the building which then challenge the building height restrictions. The additional concrete and reinforcement associated also challenges the overall buildings sustainability approach through the consumption of additional construction materials. It is considered that the soil depths and trees proposed on COS levels of Building A and C are suitably balanced to optimise resident usability through kick-about grassed spaces, aesthetics of low level ground covers, and the shade of trees at 6-8 m high.

Given the above, the trees proposed on upper building levels are compliant with the objectives of Section 4P of the ADG and provide a suitable mix of planting varieties for vistas into courtyards and the use of these areas.

Deep Soil Areas are suitably provided in the ground plane for enjoyment by the maximum number of future development users and visitors. The ground level pedestrian links, roadways and public park will allow for all sizes of vegetation to be included for even greater scale variety for enjoyment at ground level and vistas for the private residents in towers above.

Please see attached RFI – Urban Design Report and landscape plans for further details.

17. Street Activation

Street Activation has been improved substantially with redesign of operational back of house areas and an emphasis on openings and activities to the edges

of each building. Building A exhibits 84% activation at the edge and Building C exhibitions 81% of activation at the edge.

The majority of back of house areas have been placed within the basement to improve active edges at the ground floor. Further, landscape planting in the street verge of Villawood Road also softens the back of house services which remain there in this scheme.

Additionally, with the removal of the previously proposed childcare centre and the introduction of residential units on ground floor the active frontage has been significantly increased. Hard edges and screen façades have been removed to improve street activation and connectivity to the proposed public park. Further, the medial centre and neighbourhood shops retail has been placed in the north-south pedestrian link to create a full activated public space.

Relevantly, the design of the private open spaces of ground floor apartments that front the public park have been carefully conceived to ensure that the private open spaces provide passive surveillance and a sense of activation of the park, while also having design characteristics that give privacy to occupants.

Villawood Road has also been activated with the two residential lobbies of Building C now facing Villawood Road. Retail and community facilities also front Villawood Road which will suitably activate the Buildings A and C on all four frontages with this new scheme.

Childcare Centre

Childcare Centre has been removed from the proposal. This was explored in great detail to try and keep the child care within the Building C scheme – by exploring placing it in other configurations throughout the building. It was finally considered that removing the child care was an overall beneficial move for the proposal for the many reasons listed in the revised package.

Non-Residential Uses

18. The Medical Centre will be subject to a fit out but spatial planning from the architect directs that the proposed area of 340 sq.m. will provide for this service and allows for a calculation of parking requirements to be undertaken.

    The Community Facility will be used for general open space events, community group meetings, or community teaching classes. It is expected that the users will be from the local community and live in the buildings above, or walk to the space from the surrounding area. As such, parking requirements for this area will be minimal as a community provider such as Woodville Alliance with intermittently use the space to host events.

Floor Space Ratio

GFA calculation has been updated for the revised submitted proposal and also include the waste storage on ground floor and horizontal circulation areas, please see attached RFI – Urban Design Report for further details.

Site Contamination

Site Contamination comments provided by Council has been reviewed by Douglas Partners and confirms the following.

Ground water Investigation beneath Kamira Court

The submitted "*Detailed Site Investigation (DSI) did comprise groundwater investigation and testing of soils beneath Kamira Court (existing road)".* The documents have been re-submitted as part of this RFI response package.

Ground water testing

As described in the DSI further groundwater monitoring is only required for the purpose of ground water disposal, if it is required. Described by Douglas Partners;

"As per the assessment in the DSI, and further comments presented in the RAP it is considered that further groundwater monitoring is only required for the purposes of groundwater disposal (if required). No significant exceedances of human health, or ecological screening criteria were noted in the DSI (and also summarised in the RAP). "

Suitability of residential Development

Douglas Partners have provided the following comments

The DSI concludes the site can be made suitable subject to recommendations in Section 10 of the respective report, i.e. management of identified / possible ACM in soil, development of an unexpected finds protocol and groundwater testing (if required for disposal). Subsequently a Remediation Action Plan (RAP) [DP reference 86819.02.R.001.Rev0 dated July 2022] was developed to outline these management strategies, which subject to their implementation, would render the site suitable for the proposed land-use. This RAP is included in the submission package,

Unexpected finds protocol

The Remedial Action Plan prepared and included in this submission package provides both Unexpected Finds Protocol and Asbestos Management Plan. Please see attached Remedial Action Plan for further details.

Acoustic Assessment

The Childcare Centre has been removed as part of the proposal.

A copy of the Acoustic Logic Report titled *Stage 1 Kamira Ave, Villawood (ref. 20210202.1 dated 23rd July 2021,* and as approved as part of the development consent associated with Stage 1, has been included as part of this submission for reference by Public Health and Environment Division as required.

Heritage Assessment

19. Impacts to Heritage Item Villawood Railway Station.

The site is significantly removed from the relevant heritage item. It is relevant to note that the planning controls for the site have been implemented and recently revised in the DCP, notwithstanding the heritage status of the railway station. Accordingly, the LEP and DCP controls are cognisant of the heritage item and the implementation of the controls in this application confirms is not in any way antipathetic to the heritage item.

The proposed development has considered the heritage item and is designed to be sympathetic to the item. The development utilises natural colour palette and will not utilise materials which is offensive to the heritage item. It is considered that Building A, as the closest building located to the heritage station, optimises this design and is sympathetic to the item even more so than other nearby buildings previously approved and now built even closer to the station. Nothing arises in the application that negatively impacts or diminishes the status of the heritage item.

Stormwater Drainage

The responses to stormwater and drainage enquiries have been responded to by MRC Consulting Engineers, as detailed below:

20. Roof Drainage

The detail of roof drainage and relevant stormwater requirements for the building will be developed as part of the design development of the building and approved in subsequent construction certificate applications – as is standard protocol for such a project. The adequate level of civil and stormwater design has been provided with this development application in order to be approved and provided relevant conditions of consent.

21. Calculation of OSD system

Comments have been provided by the Stormwater Engineers as follows;

"*Detailed calculations for stormwater quantity have already been provided in the stormwater and drainage plans, including pre-development, post development, and post development mitigated flows with the OSD Tanks. The project has been modelled appropriately in the DRAINS software package. Please find attached a copy of the DRAINS model*. "

Please see the attached, a copy of the stormwater and drainage plans, as well as the supporting DRAINS model attached as part of this RFI, for further details.

22. Emergency weir flow for OSD system

Comments have been provided by the Stormwater Engineers as follows;

"The two OSD tanks hang from the ground floor zone. Access to these is via access grates in the level 1 car park. In the event that there was a blockage in the system, stormwater would surcharge out of these grates and into the level 1 car park zone. During the detailed design phase, an emergency access location (slot) in the level 1 wall will be provided as an emergency discharge point for water to be able to get out of the car park in the event of an emergency."

Please see attached stormwater plans for further details.

Traffic Impacts

The original Traffic Report submitted in support of this DA includes the swept paths of relevant vehicles at the critical locations within the parking levels of the building. Further, the AM/PM peak rates (per hour) provided in this report show that the development contributes a small percentage to the overall sum of the surrounding traffic network and performances of future intersections are not materially impacted by the proposed development. It is noted that the SIDRA modelling associated with the Villawood Town Centre has been provided by Fairfield Council and analysed as part of the Planning Proposal associated with the retail component of this development, then considered suitable to proceed with supporting this masterplan scheme. As further mitigation to the level service E and F of 2031 intersections, it's noted that vehicles may take alternate routes to the west and south in order to connect to the surrounding higher order road network, thus, reducing the pressure on under performing intersections.

A detailed loading management plan and operational traffic management plan can be provided at the future detailed design stage prior to issuing construction certificate – this was reasonably agreed to by Fairfield Council on the approval of the Stage 1 development.

All parking spaces are compliant with Australian Standards and all regulatory signage and line marking shall be provided on detailed plans at the relevant stages of the project prior to issuing of construction certificate.

Truck Turntables

The truck turntables are to be retained in the proposal. It is clear that the truck turntable represents the safest and most efficient way in supporting the proposed development. Accommodating U-turn or three point turn movements within the site will cause further safety concerns and is a poorer solution when considering street activation. The turntables are located in discrete areas for the purposes of loading, unloading, garbage collection, etc and represent best practice for this site. The separation of such truck movements from the ramps and movement of other vehicles also presents a superior safety feature to mixing these movements.

Transport for NSW Referral

23. SIDRA

It is noted that the SIDRA modelling associated with the Villawood Town Centre has been provided by Fairfield Council and analysed as part of the Planning Proposal associated with the retail component of this development, then considered suitable to proceed with supporting this masterplan scheme. The 2020 traffic demand data is further supported by a secondary study conducted in 2021 which shows the traffic trends are not considerably different. Both files are included in support of this submission package. Both of these data collection dates were outside of Australia's peak pandemic cases and so traffic movements considered normal. The difference between these datasets is considered negligible to conduct a further dataset to recreate the modelling base scenario.

The above datasets have been attached in PDF and it's noted that the data was sourced by and provided by Fairfield Council in support of the planning proposal for this site, and further scrutinized at the time by Council's consultants Stantec. Attached to this package is the information the Applicant has on hand to provide TfNSW and it's requested that Council please also provide the additional information to TfNSW as required, including the ".sip" file of traffic data.

The original submitted traffic impact assessment has considered the traffic impact on the broader precinct and the distribution on the broader network. As the development site is within proximity to Villawood Train Station, reliance of private vehicles trips is considered to be low. Therefore, it is expected that the development will have minimal impacts to the broader network.

It's reiterated that this development proposal contributes a minor percentage to the overall trip network of these TfNSW owned intersections and as such it's considered that the primary analysis of these future 2031 intersection performances should be a discussion for Fairfield Council and TfNSW and separate to this application.

Responses to Public Submissions

24. Suitability of childcare centre

Child care centre has been removed as part of this application.

25. Traffic congestion

The original application included a traffic impact statement which identifies the sites suitability for the development. Additionally as seen above the this RFI has adequately addressed concerns raised by council's traffic engineers and TfNSW. Due to the proximity to public transport reliance on private vehicle is considered to be low with no significant traffic impact. Further the development is situated in Villawood centre, anticipation of traffic generation is expected.

26. Parking adequacy

The provided parking is adequate for the type of development and within the site context. Residential carparking spaces complies with the relevant requirements stipulated under the Fairfield DCP. As mentioned above the site is within proximity to public transport and it is anticipated that many people will utilise different public transport nodes to access the site. Therefore the proposed carparking spaces are considered to be adequate for the development.

27. Clarification on Community facility

As outlined earlier in this response, the exact spatial layout of the community space is not yet finalised. However, the general use of the space will include community gathering and multi-purpose rooms for events and classes such as: multicultural art space, learning spaces, indoor dancing or performing rooms, etc. A community provider such as Woodville Alliance will be engaged to manage the space and the intended programs which responds best to the broader community needs.

28. Security arrangements for the public park

The proposed development provides street activation through retail spaces and residential units which provides activation and passive surveillance over the public park. The proposed development will improve security within the public domain through increased pedestrian activity and greater level of surveillance of this space, from development immediately adjacent and overlooking the public park.

29. Loss of on-street parking during construction

Construction traffic management plan will be prepared by Traders in Purple for Council review and approval prior to the start of any construction activities. The

management plans will detail potential impact on on-street parking arrangements.

10 MARCH 2023

Tree Species

Tree species have been reviewed and as a result all London Plane (*Platanus x acerifolia)* trees have been removed within the public domain area and alternative species have been proposed. Please see attached landscape plans for details.

Strata Cell System

All trees within the public domain will be provided with a suitable drainage system during the projects design development as this level of detail will need to be coordinated on construction certificate plans with other subsurface infrastructure. It's noted that in recent meetings between the Applicant and Fairfield Council's landscape architects, maintenance, and parks divisions that the enclosed public domain concept has been approved in principle. The landscape plans attached have been updated to include all comments and are suitable for stamping with a development consent. Details of the systems has been prepared, please see attached Landscape plans for further details.

17 MARCH 2023

Waste

30. Bin Volumes/ numbers/ calculations

The plans have been updated to accommodate the use of 660L bins. Please see attached Urban Design Report for further details.

31. Bin rotation

The Waste management Plan has been updated to indicate that bins are to be rotated permitting unobstructed access to Councils waste streams. Please see revised Waste Management Plan for further details.

32. Mobile Bin Towing Devise specifications

Architect plans show the proposed location of storing the required mobile bin towing device; however, the detailed manufactures specification of an exact device will be a level of detail which is sought at a later project stage and subject to building manager and bin supplier recommendations. This therefore cannot be provided at the DA stage, but it will be ensured the mobile device will be suitable for the building and waste collection needs.

33. Waste handling activities

Noted. The Waste Management Plan has been updated to include that all waste handling activities will be undertaken by the Building Manager/ care taker which is consistent with the maintenance of the chute rooms.

34. Turntable

The architectural plans have been updated to be able to accommodate Council's standard HRV. This includes the appropriate clearance height for a HRV (3.9m) and a suitably sized turntable for both Buildings A and C to accommodate this HRV. Please see revised urban design report for further details.

35. Location of Bulky waste storage

The bulky waste storage room has been proposed to remain on level 1 and the future provision for transporting bulky items down to the ground floor and next to the turn table has been described in the Waste Management Plan. This still provides a safe and efficient waste collection service. Please see attached urban design report, architect plans, and waste management plan for further details.

36. Goods lift

The area in question near the good lift has been modified by the architect to reach compliance by moving the 'MB' space to a different location. This now allows safe and efficient use of the goods lift, On-site loading bay and Residential waste room.

The design is amended to enable a HRV to use the loading bay for Building C.

Design details have been amended to accommodate the relevant bin storage and movement requirements. See the architect Design Report and plans for this detail.

37. On-site loading bay and Residential waste room

The design is amended to enable a HRV to use the loading bay for Building C.Design details have been amended to accommodate the relevant bin storage and movement requirements.

38. Better Practice Guide for Resource Recovery in Residential Flat Buildings

The details of this guideline are noted and where possible have been incorporated into the relevant DA plans, however, some spatial challenges of the ground floor have limited the amount of combination or separation of rooms as described in the letter. It's noted that in future building management plans that a coordination strategy will be set between the building manager for Fairfield Council collection days in order for waste bins to be appropriately moved and located for collection. Further, the security/separation of residential and non-residential waste disposal will be managed via security access of separate rooms with swipe cards, and all

other details of 'Better Practice Guide for Resource Recovery in Residential Flat Buildings' including lighting, ventilation, flooring and other surfaces can be implemented in future design development of the project and subsequent Construction Certificate plans for approval.

Conclusion

This submission provides a response to the matters arising in correspondence and meeting with Council and their urban design expert.

Amended architectural plans are being finalised and will be submitted along with relevant updated reports.

We are confident that the final amendments and additional reports will be suitable and enable the application to be progressed and determined by way of approval, subject to appropriate conditions of consent.

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