

ATTACHMENT F

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SUMMARY OF SUBMISSIONS

		Issue Raised	Response
1.	Height	<ul style="list-style-type: none"> • The height and scale of the proposed development is out character with the surrounding heritage conservation area which comprises low density Federation buildings and Victorian terraces. • The proposed buildings are significantly higher than the surrounding residential development around Bridge Road, Junction St and Short St. • The height of the development will dominate the streetscape and visually close off the street. • New buildings should not rise higher than the top of the warehouse parapet and should reference existing terrace widths and street access, as well as the proportions of their openings. 	<p>The current controls allow a height of 12 metres or three storeys.</p> <p>The proposal is for a 4 to 6 storey development, with street frontages of 3 storeys on Junction Street and 4 to 6 storeys on Larkin Street (including car parking). The height of the proposal provides a transition between the 5-8 storey apartment buildings to the west and 1 to 2 storey residential terraces to the east. The proposed planning controls will ensure that the Federation warehouse building maintains visual prominence along Junction Street by setting the street wall height at the same height as the Federation warehouse.</p> <p>The draft Development Control Plan (DCP) controls will ensure that new buildings fronting Junction Street complement the fine grained character of the conservation area, existing terraces on Junction Street and the warehouse building. Future design will need to respond to the proportions, vertical rhythm and horizontal elements of surrounding buildings and reduce the perceived length of the Junction Street elevation. The use of materials and finishes compatible with materials with other contributory buildings in the conservation area will also be a requirement.</p> <p>The design of the built form and how it reflects the fine grain character of the terraces on Junction Street and the character of the residential flat buildings to the west will be a consideration in a design competition if the landowner seeks additional design excellence floor space.</p>
2.	Over-shadowing of surrounding residential development	<ul style="list-style-type: none"> • The proposal will lead to significant reduction of daylight and overshadowing on the existing apartments on 1-3 Larkin St, 2A Short St and 34 Junction St. • The impacts of overshadowing on other properties including 34 Junction St have not been addressed. 	<p>The proposal includes upper level setbacks on all new buildings fronting Larkin Street and Junction Street to reduce overshadowing.</p> <p>As part of the planning proposal the City undertook urban design analysis to demonstrate that the proposal could comply with the Apartment Design Guide requirements for solar access to new and existing apartments.</p>

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			<p>The solar access diagrams indicate that while there will be some loss of winter sun to apartments, particularly on the lower levels of 1-3 Larkin Street, at least 70 per cent of apartments in 2A Short Street and 1-3 Larkin Street will still be able to receive at least two hours of sun in mid-winter. Many of the apartments at 1-3 Larkin Street will continue to receive at least 5 hours or more of sun in mid-winter. They will receive substantially more sun outside of the mid-winter period.</p> <p>The proposal will not cause overshadowing of 34 Junction Street in winter as it is located to the north of the proposal.</p> <p>A detailed overshadowing analysis will be required as part of any future development application for the site to demonstrate that the final design also complies with the solar access requirements of the Apartment Design Guide.</p>
3.	Over-shadowing of Larkin Street Reserve	<ul style="list-style-type: none"> The proposal will lead to considerable overshadowing of Larkin Street Reserve. This park will not achieve the minimum sunlight of 4 hours from 9am to 3pm on 21 June and as a result will not be used or safe. 	<p>Solar access to the existing Larkin Street Reserve as a result of the development will continue to comply with the Sydney DCP 2012 requirement of 50 per cent of the open space receives at least 4 hours sunlight from 9am until 3pm on 21 June. The extended Larkin Reserve may receive less than 50 per cent, although not significantly less. This is because the additional land being provided is adjacent to the proposal and is subject to overshadowing. Outside of mid-winter the park will receive adequate sunlight.</p> <p>The proposal is acceptable because there is a strategic need for additional well-connected and usable open space to the area and the opportunity to provide new open space in established residential areas is often rare.</p> <p>This degree of non-compliance will be tested at the development application stage and a competitive design process, if one is undertaken, with the</p>

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			potential for overshadowing to the open space to be further reduced.
4.	Visual impacts of car park	<ul style="list-style-type: none"> The car park will rise 2.6m above ground level. This will increase the height of the building and will create an unacceptable visual outcome. The permeable screening will result in headlight glare and acoustic impacts on nearby residents. The 2m landscape zone is insufficient to meet the Apartment Design Guide standard for a soil area of 6m x 6m. 	<p>The above ground car park is proposed in response to flood issues on the site. The car park will have a permeable screen to manage potential in and out flows of floodwater and a 2 metre wide landscape zone to mitigate visual impacts.</p> <p>The design of the screening and the proposed 2 metre landscape zone at ground level will be resolved through the development application process, and a competitive design process if the landowner wishes to achieve additional design excellence floor space. At these detailed stages, the screening could be designed to manage acoustic and headlight glare issues. The draft DCP control has been amended to ensure that the design of the permeable screening manages these issues.</p> <p>As the 2 metre wide landscape zone is adjacent to the Larkin Street Reserve the root zone will have adequate space to expand into the reserve and achieve the required soil area.</p>
5.	Bulk	<ul style="list-style-type: none"> The balconies will encroach into the setback area, which will add to the bulk of the building. 	Balconies must be accommodated within the building envelope and are not permitted to encroach into the setback area.
6.	View loss	<ul style="list-style-type: none"> The proposal does not promote the principle of view sharing. The sixth floor of the east facing apartments in 1-3 Larkin St will lose views of the city, including Centrepoint Tower and Barangaroo. 	<p>Views are not protected by planning legislation, however if highly valued views are lost they may be matters for consideration at the development application stage. <i>Tenacity Consulting Pty Ltd v Warringah Council</i> established a planning principle for views and view sharing which can be applied to development applications.</p> <p>There is likely to be some view loss although upper levels of 1-3 Larkin Street may retain some views. The views are distant regional views and some view loss is reasonable to</p>

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			improve housing supply and provide open space.
7.	Public benefit	<ul style="list-style-type: none"> The proposal results in increased floor space without the inclusion of any public benefits. One party will be advantaged at the expense of another. 	<p>The planning proposal only allows increased height and floor space if publicly accessible open space and a through site link are provided.</p> <p>These public benefits will increase the amount of open space in the area and the accessibility to the reserve and Larkin Street. The redevelopment of the site will improve the amenity and enhance the character of the area.</p>
8.	Maximum Floor space Ratio (landowner)	<ul style="list-style-type: none"> After extensive modelling of development potential, it is believed that the site can comfortably accommodate an FSR of 1.75:1. 	<p>The landowner's request for an increase in FSR to 1.75:1 was tested through the Rezoning Review process in October 2016. The Commission did not support the FSR request by the proponent because of the impacts on surrounding development, the need for further heritage assessment and investigation of public benefits. The City's analysis has found that a FSR of 1.56:1 (with the potential for additional design excellence floor space) can be accommodated with site constraints and Apartment Design Guide requirements.</p>
9.	Requirement for a competitive design process	<ul style="list-style-type: none"> The requirement for competitive design for additional design excellence floor space is unfair because the development does not exceed 25m which is the threshold for requiring a competition. 	<p>The planning proposal does not require a competitive design process to achieve the maximum FSR of 1.56:1. The Sydney LEP allows landowners options to choose to enter into a competitive design process. Buildings which achieve design excellence after such a process may be eligible for additional floor space of height up to 10 per cent of the maximum allowable under the controls.</p> <p>Given the site constraints, including the conservation area, proximity of residential development, narrow road network and flooding issues, a skilled design is required to achieve floor space over the maximum of 1.56:1 and achieve a high quality built outcome. The height of the development is also expected to be close to 25 metres high, depending on where it is sited.</p>

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			<p>Should future development be subject to a competitive design process, a FSR of up to 0.16:1 could be achieved, raising the overall FSR to 1.72:1.</p> <p>The DCP amendment identifies areas where this additional floor space could be located if design excellence floor space is awarded.</p> <p>The landowner may not wish to obtain the additional floor space or undertake a competitive design process and in this case is able to develop up to a maximum of 1.56:1.</p>
10.	Traffic	<ul style="list-style-type: none"> • The proposal will lead to a significant increase in vehicular and pedestrian traffic in Junction St, David St, Larkin St and St Johns Rd. • The proposal will exacerbate impacts around major thoroughfares of Ross St, Bridge Rd, and Pymont Bridge Rd. • The proposal will cause more people to make illegal right hand turns from Bridge Rd to Junction St and cause more people to travel the wrong way in the one-way section into Bridge Rd. • The transport assessment was not of appropriate rigor. The area has changed significantly since the traffic and parking assessment was commissioned in 2015. • Access to the new development should also be from Larkin St to alleviate the congestion from Junction St. • Pedestrian safety will be compromised. • Traffic congestion will also be caused from the changed direction of the traffic as more vehicles will be approaching the area, rather than leaving at the end of working days as it does now with the business premises currently on the site. • No changes to traffic measures required, subject to the submission of a transport impact assessment at the development application stage. 	<p>The traffic assessment undertaken by the landowner is based on a greater level of development than allowable in the planning proposal.</p> <p>The City commissioned an updated traffic assessment of the proposal in October 2017. This assessment concluded that a development of 87 apartments would result in significantly less trips than the existing commercial use of the site, with 25-26 vehicles trips per hour in the morning and afternoon peak periods.</p> <p>As the vehicle access to the site will remain on Junction Street, the only change would be the direction of traffic during the peak periods, with trips generated from the residential development being out of the site in the morning and returning to the site during the afternoon. As the impact on Junction Street and intersections would be less than the current situation, no remedial measures are required.</p> <p>The Roads and Maritime Services have advised that no changes to traffic measures are required and raised no objection to the proposal due to only minor traffic impacts.</p> <p>The traffic assessment will be updated if the proposals are in the future the subject of a development application.</p>

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			<p>There is no evidence to suggest that future residents will not abide by traffic rules or that pedestrian safety will be compromised, particularly when the current commercial use of the site has a greater level of traffic impact than the proposed residential use.</p> <p>Flood constraints on the site prevent the establishment of a vehicular access to the site from Larkin Street.</p>
11.	Parking	<ul style="list-style-type: none"> The proposed development will generate an additional 85-90 vehicles and exacerbate existing parking problems. The area has changed since the traffic and parking assessment was commissioned by the landowner in 2015. The existing car park is not always at full capacity and already causes significant problems. Each unit needs to provide onsite parking. Residents should not be allocated too many parking permits. 	<p>The site currently accommodates a car park with 100 spaces.</p> <p>An updated traffic assessment has concluded that traffic volume generated by the proposal will be significantly less than that generated by the commercial use of the site, with only the direction of movements changing in the peak hours.</p> <p>Any future development on the site will be required to comply with the on-site parking rates in <i>Sydney Local Environmental Plan 2012</i> (LEP) which aim to reduce traffic congestion.</p> <p>Future on-street car parking arrangements will be managed through the Council's existing resident parking scheme which means new residents will not be issued with on-street parking permits.</p> <p>The transport assessment will be further updated if the proposals are the subject of a future development application.</p>
12.	Impacts on existing infrastructure	<ul style="list-style-type: none"> The increased population from the proposed development will place additional pressure on existing bus services which are already overcrowded. The proposal will place increased strain on existing infrastructure, including hospitals, schools and public transport. 	<p>The provision of public transport, hospitals and schools are undertaken by NSW Government Agencies. The City acknowledges and shares concerns that investment by NSW Government agencies towards key infrastructure, must keep pace with rapid redevelopment across the city, and continues to work with NSW Government agencies to provide infrastructure that is commensurate with growth.</p>

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13.	Open space provision	<ul style="list-style-type: none"> • There is a shortage of publicly accessible open space in the area. Open space provision does not meet the required 1500sqm. • Increased population will add additional pressures on the existing open space and increase the deficit in open space. • The additional 85 apartments will reduce the existing open space ratio per resident and place considerable demand on these areas at peak usage times in the afternoon and on weekends. • Existing public open space should be combined to increase its collective value. • The proposed access from St Johns Rd has a canyon-like view corridor and needs to be widened. • The above ground car park and flood storage will be insufficiently set back from the proposed expansion of the Larkin Street Reserve and visually dominate the park. 	<p>The proposed extension to Larkin Street Reserve which is currently 1,055sqm will be increased by 450sqm. The increased open space will extend the setting of the reserve and increase the usability of the site and the diversity of uses.</p> <p>The through-site link from St Johns Road and Junction Street will increase accessibility to the open space from Junction Street and St Johns Road for neighbouring residents.</p> <p>The proposal is adjacent to the Camperdown area which is identified in the City's <i>Draft Open Space Sports and Recreation Needs Study 2016</i> to have a shortfall of open space. The increased provision of 450sqm of open space and the new connections to the park will bring more residents within 400 metres walking distance of the park and contribute towards mitigating the demand created from the proposal.</p> <p>The through site link is 6 metres wide, which is sufficient to accommodate pedestrian and cycle access, implements the City's Liveable Green Network Plan.</p> <p>The car park will be set back 7 metres from the Larkin Street Reserve at its closest point and screened by 2 metres of landscaping. The setbacks and planting help ameliorate the scale of the building.</p>
14.	Heritage (landowner)	<ul style="list-style-type: none"> • The significance of the former hat factory structure has been exaggerated in the heritage assessment. Only a portion of the existing structure (10 metres from the Junction Street frontage) should be retained and adaptively reused. • The requirement to reinstate the timber frame windows is unsubstantiated. • The 3m setback adjacent to the stone retaining wall is inappropriate due to its condition and poor structural integrity. The wall may need to be entirely rebuilt to be retained or reused on the site for interpretation. 	<p>The NSW Office of Environment and Heritage supports the requirements in the DCP amendment as they maintain the integrity and character of the heritage conservation area.</p> <p>The City's heritage assessment has confirmed that the warehouse retains heritage values that contribute to the understanding and intactness of the conservation area. It dates the warehouse from 1901, one of the key periods of significance in the conservation area. The landowner's heritage consultant agrees that: <i>'It (the Federation warehouse) should be</i></p>

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		<ul style="list-style-type: none"> The heritage assessment requires further development and the consideration of a Conservation Management Strategy (CMS). 	<p><i>considered a contributory building and allowed to be adapted for reuse. It is not reasonable and or possible to reverse recent changes due to unknown earlier state. The recent rear addition could be removed.'</i></p> <p>While it was highly likely that the original windows were timber framed, there is no evidence to support this requirement at this time. This requirement has been removed from the draft DCP amendment.</p> <p>It is agreed that the site would benefit from a Conservation Management Strategy and that one should be prepared. This requirement has been included in the amended draft DCP.</p> <p>A 3m setback is applied to the new buildings on either side of the Federation warehouse. This setback allows for conservation of the wall and to ensure that warehouse retains visual prominence along Junction Street. The retention of the stone wall is appropriate and will not reduce the development potential of the site.</p> <p>It is accepted that due to the poor condition of the wall, that rebuilding may be required. Any rebuilding however must reuse the existing stone from the wall. This requirement has been included in the amended draft DCP.</p>
15.	Heritage	<ul style="list-style-type: none"> The warehouse does not warrant preservation as it is has no significance and does no relate to the surrounding single and double storey residential buildings. The Junction Street stone retaining wall and potential stone footings should be retained. Support for the requirements in the DCP amendment if they maintain the integrity and character of the heritage conservation area. 	<p>The City's heritage assessment has confirmed that the warehouse retains heritage values that contribute to the understanding and intactness of the conservation area. It dates the warehouse from 1901, one of the key periods of significance in the conservation area.</p> <p>Amendments to the draft DCP ensure that the stone retaining wall is retained and existing stone from the wall reused.</p>
16.	Design	<ul style="list-style-type: none"> Setbacks should be increased to allow for more native tree planting, to reduce the scale of the development. 	<p>The new buildings are proposed to be setback 3 metres from Junction Street which is generally consistent with setbacks on Junction Street. The</p>

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		<ul style="list-style-type: none"> • Even with half of the 10per cent increase available through design excellence, allowing a grossing up factor (for balconies, terraces, stairs and lifts) the envelope proposal overstates the development by approximately 1,250sqm. • There is an absence of controls relating to the length of buildings. • Car parking is not screened by active uses to a minimum depth of 6m from the facade visible from the street as required by the Sydney DCP 2012. • The above ground car parking rises more than 1m above ground which is not consistent with the Sydney DCP 2012. 	<p>proposed setbacks enable appropriate planting which will improve on the existing surface car park.</p> <p>The submission appears to apply an 85 per cent efficiency factor to Gross Floor Area (GFA) and implies that the floor space could be accommodated in a smaller building envelope. In the City's master planning experience in the GFA to building envelope efficiency is lower, and between 70-75 per cent. This is a conservative approach which gives greater certainty that the buildings can be accommodated within the envelope</p> <p>The proposed DCP controls will ensure that new buildings fronting Junction Street complement the fine grained character of the conservation area, existing terraces on Junction Street and there warehouse building. This will be achieved through fine grain design and massing that responds to the proportions, vertical rhythm and horizontal elements of buildings in the area and reduces the perceived length of the Junction Street elevation. The use of materials and finishes compatible with materials with other contributory buildings in the conservation area will also be required.</p> <p>The length of buildings will be addressed articulation of street frontages on Junction Street and the Larkin Street side of the development. The length of the Junction Street elevation will be broken up by the heritage warehouse.</p> <p>At the development application stage a proposal will need to demonstrate compliance with Part 4M of the Apartment Design Guide. This provision encourages modulation of facades to reduce the perceived bulk and scale of a building, including varied building elements, changes in materials and well composed horizontal and vertical elements.</p> <p>These matters will be resolved through the development application</p>

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			<p>stage, and if additional design excellence floor space is sought, a competitive design process.</p> <p>The above-ground car park is proposed in response to a site-specific flood issue, therefore DCP guidance limiting the height above ground of car parking structures cannot apply.</p> <p>The car park floor is elevated 2.6 metres above the ground due to flood issues. This cannot be screened by active or residential uses at this level, because they would be subject to flooding.</p>
17.	Green Corridors	<ul style="list-style-type: none"> The Orphan School Creek corridor, extends from the Glebe foreshore walk and Johnson Creek corridor and passes through the site but is not referenced. This corridor should extend further into Forest Lodge to link up to Parramatta Road and the University of Sydney. Planning controls should be strengthened to ensure the creek is enhanced as a nature reserve. A broader masterplan for the future green corridor between Bridge Rd, Pymont Bridge Rd and Sparkes / Arundel Streets could include dedications at 300 Bridge Rd, 12 Larkin St and the rear of 34 Junction Street. 	<p>The Orphan School Creek biodiversity corridor will be strengthened through the proposed controls and the requirements for open space, setbacks and plantings along the corridor. The planning proposal does not rule out a link continuing from Bridge Road through to Larkin Reserve in the future, however opportunities to further extend the corridor are limited to those sites which may be developed. This could include sites to the north and south of the subject site at 12-14 Larkin Street and 300 Bridge Road.</p>
18.	Noise	<ul style="list-style-type: none"> The proposal will result in increased noise from apartment residents, garbage trucks and recycling trucks. Noise and pollution will reduce residential amenity. 	<p>This proposal is on land already zoned to accommodate residential uses, and reflects the existing residential character of the area.</p> <p>Any future development consent will include conditions for the location of waste storage areas and identify hours when the collection of waste and recycling must occur to avoid noise disruption to the surrounding area.</p>
19.	Waste	<ul style="list-style-type: none"> The proposal will lead to additional illegal dumping of waste on Larkin Street. 	<p>Any future development application will require a waste garbage room on-site to meet the needs of future residents. Any reports of illegal</p>

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			dumping will be referred to City waste services for removal and where compliance action will be taken where possible.
20.	Privacy	<ul style="list-style-type: none"> The proposed will result in overlooking and loss of privacy to residences on St Johns Road, Junction Street and David Street. Line of sight will be enabled into habitable rooms due to the limited setbacks from the northern boundary. 	<p>The internal layout of the proposed development, for example where balconies and habitable rooms will be located, will be determined at the development application stage.</p> <p>The proposal complies with the setbacks required by the Apartment Design Guide between habitable rooms of surrounding development.</p> <p>At the development application stage a proposal will need to demonstrate compliance with the Apartment Design Guide and ensure that visual privacy is achieved.</p>
21.	Land use conflict	<ul style="list-style-type: none"> The residential use will conflict with a mixed use site at Kimber Lane, which has already been the subject of noise complaints. 	<p>The proposal is on land with a B4 mixed use zoning, which allows both residential and commercial uses. The proposal does not change the uses permitted on the site, or that of adjacent sites. The vast majority of land in the vicinity of the site is used for residential purposes.</p>
22.	Infrastructure	<ul style="list-style-type: none"> There is no undertaking to improve the drainage infrastructure at the site, only warning systems. The need to achieve minimum safety distances from Ausgrid overhead power lines, underground cables, substations and an electricity easement on the site. 	<p>The planning proposal details a number of measures to mitigate flood risk, and development is not permitted to increase flooding on the site or in the surrounding area.</p> <p>A detailed flood assessment will be required as part of any development application. The <i>Johnstons Creek Floodplain Risk Management Plan</i> (September 2015) includes recommended management measures to improve drainage in the area. Long-term mitigation measures include provision of detention storage with 14,400 cubic metres capacity to mitigate flooding in the vicinity of the Parramatta Road and Larkin Street intersection and reduce the flood liability for the residential properties located on the Larkin Street low point.</p> <p>The submission received from Ausgrid includes conditions which will be</p>

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			considered in any future development consent for the site. The relocation of the substation on the site to accommodate the built development will be addressed at the development application stage, with any agreed relocation being at the developers cost.
23.	Other	<ul style="list-style-type: none"> • The proposed development will have a detrimental impact on the property values. • Increased density will lead to risk of fire. • Residential development is occurring amidst a decline in the diversity of business and entertainment in the area. • Need to consider how walking and cycling amenity will be addressed. • Need to plan for better access for emergency services such as fire, ambulance. 	<p>Issues that are relevant to planning decisions include (but are not limited to) matters such as traffic, noise and overshadowing. Issues such as property values, boundary disputes or commercial competition are examples of matters that cannot be taken into account in planning decisions.</p> <p>The area to the west of the site is already characterised by high density residential development. If in the future a development application is approved, new development will be required to undergo building certification which will ensure that the construction of buildings is safe and minimises fire risk.</p> <p>The site is located within 800 metres of business and entertainment uses on Glebe Point Road and walking distance of small scale businesses on St Johns Road. The planning proposal reflects the use and character of the surrounding area. Additional population will help support business and entertainment uses in surrounding centres.</p> <p>The through-site link is 6m wide which can comfortably accommodate neighbourhood pedestrian and cycle access.</p> <p>The planning proposal will not change the form of the road network serving the site which currently accommodates emergency vehicles. Traffic generation from the residential use of the site will be less than the current commercial use and will not undermine access to the area from emergency vehicles.</p>