

Woolooware Bay – Detailed Response to Submissions Table

October 2015



Issue	Response
Department of Planning and Environment	
Gross Floor Area and Gross Building Area	
Provide a schedule comparing the approved and remaining gross floor area (GFA) and gross building area (GBA) per stage and per building in the Residential Precinct against the maximum GFA and GBA in the concept approval	A detailed schedule comparing the approved and remaining gross floor area (GFA) and gross building area (GBA) per stage and per building in the Residential Precinct against the maximum GFA and GBA in the concept approval has been provided in the covering Response to Submissions Report.
Provide a general indication of the non-residential land uses proposed, together with the GFA and GBA	<p>The following non-residential land uses have been included in the revised indicative scheme:</p> <p>Retail/Cafe / Commercial tenancies (office and business premises) - 270m² GFA</p> <p>Given the all encompassing nature of GBA, it is difficult to separate non-residential GBA from residential GBA. The above GFA figures provide an indication of the scale of non-residential land uses approved/envisaged in the residential precinct.</p>
Building Envelope Modifications	
The description of the proposal in section 1.0 Introduction (final dot point) and the illustrative plans suggest that the eastern boundary of the Building C envelope extends eastwards to include balconies, but this is not shown on the envelope diagram plans	The proposed revised building envelope drawings have been amended to illustrate a balcony articulation zone on the eastern boundary of the Building C envelope (refer to Appendix B). This zone for balconies will allow for activation along the eastern frontage of Stage 3, enabling courtyard style balconies to be provided on the terrace dwellings.
Car parking	
As no additional parking is proposed, demonstrate that the shuttle bus has capacity to accommodate the proposed increase in residents	The full size shuttle bus will have sufficient capacity to account for the expected population of Woolooware Bay, including the 48 additional apartments expected to be facilitated through the proposed modifications. Further details on the shuttle bus are provided in the Response to Submissions Report.
Provide a schedule demonstrating how the proposed car parking meets the parking rates and maximum cap set out in the Terms of Approval. This will need to relate to the unit mix and floor space for commercial uses and include car parking approved under stages 1 and 2, and proposed in stage 3	A schedule as requested by the Department is provided in the Response to Submissions Report. This schedule is based on the revised indicative scheme prepared by Turner and the approval of Concept Plan Modification 4 (MP10_0229 MOD 4).

Issue	Response
Sutherland Shire Council	
Gross Floor Area	
<p>The applicant has used up proportionally more GFA in the first two stages and is now asking for more to 'fill up' the approved building envelopes in Stage 3. The open ended terms of the Minister's original approval left this approach available to the applicant.</p>	<p>Additional GFA has been included in the Stages 1 and 2 development as outlined in Section 3.1.1 of the submitted Environmental Assessment Report. The fundamental reason for including additional GFA in the first two stages of the residential precinct has been the need to achieve the requirements of the Concept Plan Approval and to satisfy Council in providing activation on each frontage. Council has been intimately involved in the assessment of the development applications for Stages 1 and 2 and has never raised any concern with the proportion of GFA being utilised, recognising that an improved outcome has been achieved through an activated ground plane.</p> <p>The Minister's Concept Plan Approval (executed by the PAC) does not provide open ended terms. Savings and Transitional Provisions inserted into Schedule 6A of the Environmental Planning and Assessment Act 1979 (EP&A Act) allow for the modification of Concept Plans approved under Part 3A (now repealed).</p>
Parking	
<p>The site is in an isolated location with poor connectivity to public transport, and adjacent to sporting grounds that are heavily utilised year round.</p>	<p>The suitability of the site for higher density residential development has been acknowledged in the approval of the original Concept Plan. It has been agreed through the approval of the Concept Plan that the site is not isolated and sufficient transport arrangements will be in place to accommodate the needs of the future population. The Woollooware Bay development is expected to generate demand for an additional bus service in the locality, in turn enhancing the public transport connectivity of the entire locality surrounding the site. In the interim period, a dedicated full sized shuttle bus will be provided to ensure bus connections to Woollooware Railway Station located one kilometre from the site. With this dedicated shuttle bus service, the Woollooware Bay development will be one of the most accessible new developments in the Sutherland Shire.</p> <p>The relationship of the parking demand of the Woollooware Bay development and the surrounding playing fields has been rigorously assessed as part of the original Concept Plan approval. The parking demands of the future residents and visitors of the residential precinct will be appropriately met through the parking to be provided in accordance with the Concept Plan rates (as modified).</p>

Issue	Response
<p>Parking beyond the boundaries of the site within practical walking distance has been provided by Council to service the needs of the community using the sporting facilities. It is often at capacity and cannot be relied upon as overflow parking for residents and visitors of the proposed development. For the purpose of assessment it should be assumed that there is no on street parking available within convenient walking distance of the site.</p>	<p>No parking beyond the site has been factored into the demand analysis. Parking to account for the full demand generated by the Woollooware Bay development will be provided on-site.</p>
<p>On-site parking should be considered as a primary limiting factor in how many apartments/how much floor space can be accommodated on the site. The unsuitability of the site for basement parking effectively prevents the amount of parking on the site from being increased over that already approved.</p>	<p>No modification is sought to the maximum number of car parking spaces (883 spaces). The provision of future apartments will be guided by the allowable number of parking spaces which can be provided on the site. As outlined in the parking schedule provided in the Response to Submissions Report, it is not expected that the maximum number of allowable spaces under the Concept Plan will be provided on the site.</p>
<p>Council is not satisfied that the proponent has adequately demonstrated that the parking demands for the development can be met for Stage 3 of the development. Council reiterates its previous comment that reliance on 'dual use' parking spaces, proposed by MP1 0_0229 MOD 4, would suggest that the development has already reached its development capacity.</p>	<p>A response was provided to the Department addressing the Council comments on Concept Plan Mod 4. These comments did not insinuate that the development capacity had been reached, rather that the range of commercial uses should be defined and the residential visitor peak period explained.</p> <p>The dual use of spaces directly reflects the variable demand patterns of different land uses in a large scale mixed use development. Council has acknowledged the potential for sharing spaces in the current and draft development control plans, confirming that this approach is a viable outcome if different demand periods can be demonstrated.</p> <p>Utilising a dual use approach to some car parking spaces does not suggest the capacity of the development has been reached, rather it reflects that a considered and efficient use of car parking spaces is proposed.</p>
<p>The maximum parking capacity of 883 spaces was imposed by the Planning Assessment Commission based upon the original concept proposal of 600 units. The proposed increase in apartment numbers to 643 would logically result in an increase in maximum parking demand.</p>	<p>The maximum number of car parking spaces (883) is not expected to be exceeded and is not proposed to be amended as part of this modification application. A schedule of parking based on the approved Stages 1 and 2 developments and the revised indicative design scheme for Stage 3 is provided in the Response to Submissions Report.</p>

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<p>The following questions needs to be answered</p> <ul style="list-style-type: none"> - How much parking will be ultimately provided on site? - How much has been allocated for use in stages 1 and 2 for residential, visitor and commercial purposes? - Will adequate parking be left to support stage 3 with the additional floor space requested (in accordance with the rates in schedule 3, condition 6 of the concept approval)? 	<p>The maximum number of car parking spaces (883 spaces) is not proposed to be amended. A schedule of parking based on the approved Stages 1 and 2 developments and the revised indicative design scheme for Stage 3 is provided in the Response to Submissions Report. A total of 863 spaces (+2 loading spaces) are expected to be provided on the site, within the maximum number permitted in the Concept Plan Approval.</p> <p>Refer to table provided in the Response to Submissions Report.</p> <p>The Stage 3 development will be provided in accordance with the approved car parking rates in the Concept Plan (as modified). The maximum number of car parking spaces (883 spaces) is not proposed to be amended.</p>									
<p>All parking generated by the development must be accommodated within the subject site.</p>	<p>All parking generated by the Woollooware Bay development will be accommodated within the site in accordance with the approved parking rates of the Concept Plan (as modified).</p>									
Building Envelope Modifications										
<p>Council raises no objection in principle to minor amendments to buildings B and C, provided that the building envelopes drive future building designs that are capable of compliance with State Environmental Planning Policy 65 and the Apartment Design Guide (ADG).</p>	<p>The proposed amendments to the building envelopes of Buildings B and C are expected to result in enhanced amenity outcomes and high quality building designs, consistent with the principles of SEPP 65 and the objectives of the Apartment Design Guide (ADG). Compliance with the objectives of the ADG is demonstrated in the revised indicative scheme for Stage 3 prepared by Turners.</p>									
<p>Council is concerned that the reduction in the separation distances between buildings B and C and buildings B and D to 6.8m and 18m respectively, would be inconsistent with the ADG guidelines.</p>	<p>The proposed separation distances are generally consistent with the recommended separation distances of the ADG as follows:</p> <table border="1" data-bbox="922 1046 1868 1139"> <thead> <tr> <th>Buildings</th> <th>ADG Separation</th> <th>Proposed Separation</th> </tr> </thead> <tbody> <tr> <td>Building B and C</td> <td>9 - 12 metres (up to 4 storeys)</td> <td>7.6 – 8.6 metres</td> </tr> <tr> <td>Building B and D</td> <td>18 metres (up to 8 storeys)</td> <td>18 metres</td> </tr> </tbody> </table> <p>Further discussion on the proposed separation distances is provided in the Response to Submissions Report.</p>	Buildings	ADG Separation	Proposed Separation	Building B and C	9 - 12 metres (up to 4 storeys)	7.6 – 8.6 metres	Building B and D	18 metres (up to 8 storeys)	18 metres
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Traffic	
The increase in floor space/apartments will increase traffic in the locality.	The Traffic and Parking Assessment provided at Appendix C of the submitted Environmental Assessment Report outlining the additional traffic generation expected as a result of the indicative scheme. It is acknowledged that there will be a minor increase in traffic generation compared to the original indicative scheme, but McLaren Traffic Engineering have confirmed that there is sufficient capacity in the surrounding road network.
Should the Sharks be given more residential units, and therefore another portion of the capacity available in the road network, potentially at the risk of other key employment and residential sites being constrained from achieving their potential?	<p>The idea or approach of not approving any additional development at Woolooware Bay to 'save' capacity for future potential developments is unfounded and inconsistent with regular planning processes. If this approach were adopted across the entire Sydney Metropolitan Area there would be no development to safeguard future capacity. Any future development, including development at Woolooware Bay, must demonstrate there is sufficient capacity in the surrounding road network. If adverse impacts are identified as a result of any development proposal, mitigation measures would need to be developed and implemented along with the development proposal. Council and the State Government have a responsibility to plan and upgrade infrastructure to accommodate growth.</p> <p>The proposal seeks to allow for more GFA in an established new centre, facilitating additional residential apartments with immediate access to services and facilities. The proposal directly contributes to overcoming Sydney's critical housing shortage. Speculation on other future, potential, developments is poor practice as these may never occur and do not provide any certainty in contributing to resolving current real problems such as a critical housing shortage.</p>
Public Transport	
The Sharks site is poorly served by public transport and is an 'out of centre' development. The concept approval requires provision of a shuttle mini-bus service connecting with local train stations. The population on the site may well be over 1000 people with the additional apartments proposed. The adequacy of a small shuttle bus to serve the needs of the proposed expanded population is not addressed in the application.	<p>Council's comments are inconsistent with past statements and unsubstantiated. Further discussion on these preliminary comments is provided in the Response to Submissions Report.</p> <p>The full size shuttle bus will have sufficient capacity to account for the expected population of Woolooware Bay, including the 48 additional apartments expected to be facilitated through the proposed modifications. Further details on the shuttle bus are provided in the Response to Submissions Report.</p>
Transport for New South Wales	
TfNSW has reviewed the submitted information and has no further comment on the application.	Noted.

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Roads and Maritime Services	
RMS has reviewed the information submitted and raises no objection to the application as the proposed modifications are unlikely to result in a significant increase in traffic generation and impact on the classified road network beyond the previously approved development.	Noted.
Council should ensure an adequate number of car parking spaces are in place for the increased floor area added to this development.	Noted, the future Stage 3 development will be the subject of a development application to Council and car parking will be provided in accordance with the approved Concept Plan (as modified).