



Kylie Rourke - 9710 0535
File Ref: DN16/0010

22 March 2016



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Dear Ms Gibson

Section 75W modification Applications: Modification to Concept Plan (MP10_0229 MOD 6) and Modification to Stage 1 Project Approval (MP10_0230 MOD3) at 455, 461 & 471 Captain Cook Drive, Woollooware.

Thank you for the opportunity to make a submission on the above proposal. Council has reviewed the proposal and provides the following comments.

Council provided detailed comments to the Department and the PAC on the concept application, and every subsequent application in relation to this development. It is disappointing that Council's input has had little influence on the outcomes of the assessment process, considering that the long term impacts of the development will affect Council and the local community.

Many of the comments below are therefore a repetition of previous concerns raised that are amplified by the proposed further expansion of the development. The cumulative impacts of the development need to be considered as the development progressively grows larger and more intense.

1. Increase in Floor Area

The amendment proposes additional Gross Floor Area (GFA) and a substantial increase of 9,609m² in Gross Building Area (GBA). The addition of a full roof structure above the level 4 car parking deck will substantially increase the bulk and dominance of the building.

The proposal is a large retail centre to be constructed on a prominent, isolated site, adjacent to the fragile mangrove landscape of Woollooware Bay. It is crucial that the environmental assessment requirements in Schedule 3 of the PAC approved Concept Plan (especially those relating to built form, ecologically sustainable development, public domain and landscaping) are fully complied with for the centre to successfully integrate within its sensitive context.

There is an opportunity to articulate the large horizontal building mass into smaller distinct forms, for example, by creating a glazed roof level slot or breaks in the building. Large signage and applied architectural motifs are not sufficient to introduce an appropriate scale and modulation into the building's very long elevations and extensive parking roof levels.

2. Relationship to the public domain and natural environment

Council expressed concerns with the initial concept application regarding the introverted design of the retail centre and the resultant poor relationship to the public domain and the natural environment.

While Council is supportive of the increase in size of the active spaces at the pedestrian entry from Captain Cook Drive, it seems to be at the cost of other active uses on Captain Cook Drive that were previously proposed as retail spaces. This is contrary to the concept approval requirement that the Captain Cook Drive Frontage be activated.

The ground floor of the proposal facing the riparian zone is proposed as services areas, a liquor store and a supermarket. These uses will not successfully activate this elevation, in accordance with the Concept Plan conditions. The enclosure of the (previously open) northern dining terrace would dilute the connection of this element of the proposal with the riparian zone and public open space.

The ground floor level (Level1) is poorly connected to the street, accessed by a narrow path into the building, which is "tucked behind" the level 2 stair.

The proposed entry to the club still requires patrons who enter from Captain Cook Drive to walk in excess of 100m along the top of the roof top car park to enter the club. A direct, safe and attractive entrance has not been provided to this element of the proposal. This is an important facility that should be a more prominent element in the design.

Many of Council's previous concerns raised about the activation of the Captain Cook Drive frontage, riparian zone and pedestrian connectivity remain unresolved.

3. Parking

The site is in an isolated location with poor connectivity to public transport, and adjacent to sporting grounds that are heavily utilised year round.

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. On-site parking should therefore be considered as a primary limiting factor in how much floor space can be accommodated on the site.

The amended proposal includes a substantial increase in GFA and new tenancy layouts that indicate two major supermarkets, a major liquor outlet and a childcare centre, which are recognised as very high parking and traffic generators. There is no additional parking to cater for the intensification of the use.

Council is not satisfied that the proponent has adequately demonstrated that the parking demand of the expanded retail development can be met on site.

4. Traffic

Council's previous concerns regarding the intensification of the use on the site, and the implications on the surrounding road network remain.

The increase in retail floor space and the proposed combination of high traffic generating uses will increase traffic in the locality. While it is possible to demonstrate that the nearby road network is not at capacity, there are broader implications that need to be considered.

Council has a housing strategy and a new LEP that provides additional development potential in other centres and locations. It is also the case that the 'Toyota' site to the west of this site will be redeveloped in the near future. This is a key strategic site in the subregion for employment and its future use will almost certainly be more intense than the current warehouse/office use.

Essentially the question to be answered is should the Sharks be given 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.

5. Public transport

As mentioned on a number of previous occasions, it is a fact that the Sharks site is poorly served by public transport and that it is an 'out of centre' development.

The residential population of the development may well be over 1000 people. The current proposal is to increase retail floor space and introduce higher travel demand land uses.

The concept approval requires provision of a mini-bus shuttle service connecting with local train stations. The adequacy of a small shuttle bus to serve the needs of the proposed expanded development is not addressed in the application and the cumulative demand for public transport must be seriously questioned in the assessment of this application.

If you need any clarification of the above comments, please contact Council's Development Assessment Officer Kylie Rourke on 9710 0535 or email krourke@ssc.nsw.gov.au and quote the application number in the subject.

Yours faithfully

A handwritten signature in black ink, appearing to read 'P Barber', with a horizontal line extending from the end of the signature.

Peter Barber
Director, Shire Planning