



**Transport
for NSW**

Mr Brendon Roberts
Senior Planning Officer
Key Site Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Brendon Roberts

**Request for Secretary's Environmental Assessment Requirements (SEARs) for a
S75W modification to MP10_0198 Channel 9 Site, 6-30 Artarmon Road, Willoughby**

Dear Mr Roberts

Thank you for your request dated 4th May 2016 requesting Transport for NSW (TfNSW) provide its input into the draft SEARs for a S75W modification to MP10_0198 Channel 9 Site, 6-30 Artarmon Road, Willoughby.

TfNSW has reviewed the draft SEARs for the S75W modification and appreciates the opportunity to provide comments. The suggested additions and changes to the SEARs are provided in track changes in the attached Draft SEARs for the above development application.

Thank you again for the opportunity to comment on the draft SEARs. If you require further clarification regarding this matter, please don't hesitate to contact Dorna Darab, Senior Transport Planner on 8202 2196.

Yours sincerely

Neill Miller

**A/Principal Manager Land Use Planning and Development
Freight, Strategy & Planning Division**

CD16/06348

Secretary's Environmental Assessment Requirements

Section 75W of the *Environmental Planning and Assessment Act 1979*

Application number	MP 10_0198 (MOD1)
Project	Modification to the concept approval to increase building envelopes, development yield and associated amendments
Location	Former Channel 9 site, 6-30 Artarmon Road, Willoughby
Proponent	JBA, on behalf of LEPC9 Pty Ltd
Date issued	DRAFT
Expiry date	If you do not lodge the Environmental Assessment (EA) within 2 years of the issue of these SEARs, you must consult further with the Secretary in relation to the preparation of the EA.
General Requirements	<p>Notwithstanding the key issues specified below, the EA must include an environmental risk assessment to identify the potential environmental impacts associated with the development.</p> <p>Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> adequate baseline data; consideration of potential cumulative impacts due to other development in the vicinity; and measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment. <p>The EA must be accompanied by a report from a qualified quantity surveyor providing:</p> <ul style="list-style-type: none"> a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the EP&A Regulation 2000) of the proposal, including details of all assumptions and components from which the CIV calculation is derived; an estimate of the jobs that will be created by the future development during the construction and operational phases of the development; and certification that the information provided is accurate at the date of preparation.
Key issues	<p>The EA must address the following specific matters:</p> <p>1. Relevant EPI's policies and guidelines to be addressed</p> <p>The EA shall address the statutory provisions applying to the site contained in all relevant environmental planning instruments (EPIs), including:</p> <ul style="list-style-type: none"> <i>State Environmental Planning Policy (Infrastructure) 2007;</i> <i>State Environmental Planning Policy No. 19 – Bushland in Urban Areas;</i> <i>State Environmental Planning Policy No.55 – Remediation of Land;</i> <i>State Environmental Planning Policy No.65 – Design Quality of Residential Apartment Development;</i> <i>State Environmental Planning Policy (Building Sustainability Index: Basix) 2004;</i> and <i>Willoughby Local Environmental Plan 2012.</i>

The EA shall also address relevant planning provisions, goals and strategic planning objectives in the following:

- A Plan for Growing Sydney;
- NSW Long Term Transport Master Plan;
- Development Near Rail Corridors and Busy Roads - Interim Guideline;
- Guide to Traffic Generating Developments;
- NSW Bicycle Guidelines;
- NSW Planning Guidelines for Walking and Cycling;
- Interim Construction Noise Guideline;
- Crime Prevention Through Environmental Design (CPTED) Principles;
- Heritage Council Guideline, Design in Context – guidelines for infill development in the Historic Environment (2005);
- Heritage Council Guideline on Heritage Curtilages (1996);
- Willoughby City Strategy; and
- Willoughby Development Control Plan.

2. Comparison with the concept approval (MP10_0198)

The EA shall:

- provide a comparative assessment of the proposed modification against the concept approval (qualitative and quantitative), providing a rationale for the amendments and an analysis of benefits / impacts, including measures to mitigate any potential impacts; and
- demonstrate that the proposal has limited environmental impacts beyond those already assessed for the concept approval.

3. Design excellence, built form and public domain

The EA shall:

- demonstrate how the proposed modification to the concept approval is capable of achieving design excellence and how design excellence will be ensured in the future development applications;
- address the height, bulk and scale of the proposed development within the context of the surrounding area and nearby Artarmon Conservation Area, demonstrating how the proposal integrates within the local environment and relates to the height of existing / approved development surrounding the site;
- include a detailed visual and view analysis to and from the site from key vantage points, including the suburbs of Willoughby, Artarmon and Northbridge;
- demonstrate how the orientation, height, bulk, scale, massing, activation and building setbacks will reflect the context of the surrounding area;
- detail proposed open space provision on site, including measures to clearly define public, private and communal space, and integrate the open space, public domain and landscaping proposals within the existing area; and
- demonstrate how the proposal is capable of complying with safety by design principles (CPTED).

4. Environmental and residential amenity

The EA shall:

- provide an assessment of any environmental impacts on the surrounding area, such as overshadowing, solar access, acoustic privacy, visual privacy, view loss and micro climatic impacts and propose measures to mitigate any impacts;
- demonstrate that the concept proposal is capable of complying with SEPP 65 – Design Quality of Residential Apartment Development and the Apartment Design Guide, including justification for any potential compliance / non-

compliance;

- address any visual impact with regards to the adjacent telecommunications tower; and
- provide details of proposed adaptable housing in accordance with Section C6 of the Willoughby Development Control Plan (Section C6).

5. Transport & accessibility impacts

The EA shall provide a transport ~~and accessibility impact assessment~~ plan that is underpinned by providing an assessment of the following:

- ~~existing transport network including public transport accessibility, service levels and utilisation and bicycle and walking infrastructure and road network performance~~ current daily and peak hour vehicle, public transport, pedestrian and bicycle movements, together with the existing traffic and transport infrastructure provided adjacent to the site and the cumulative impacts of existing, proposed and approved developments in the area;
- ~~Future travel demands associated with the subject development and the cumulative demands of growth from regional movements and surrounding land use changes~~ existing and future performance of key intersections providing access to the site and any road/intersection upgrades required to accommodate the development, using modelling and analysis supported by RMS;
- ~~Future transport network including public transport accessibility and services, bicycle and walking infrastructure and road network performance (using appropriate tools such as transport and traffic models and benchmarking against similar developments)~~ operation of existing transport networks, including rail and bus, and their ability to accommodate the forecast number of trips to and from the development;
- measures to encourage users of the development to make sustainable travel choices, including proposals to improve walking, cycling, public transport and car sharing, such as integration with existing pedestrian and cycle networks and provision of cycle parking / end of trip facilities;
- arrangements for access, loading and deliveries, including service vehicle movements;
- on-site car parking having regard to the site's accessibility to public transport, Willoughby Development Control Plan and the *Guide to Traffic Generating Developments*; and

6. Construction management

The EA shall include a draft construction management plan that includes:

- details of ~~construction~~ vehicle routes, peak hour and daily ~~truck~~ ~~construction vehicle~~ movements, hours of operation, access arrangements and traffic control measures for all demolition / construction activities;
- assessment of road safety ~~at key intersections and locations subject to pedestrian / vehicle / bicycle conflicts~~ impacts resulting from construction activities;
- details of temporary ~~cycling~~ ~~bicycle~~ and ~~pedestrian~~ ~~walking~~ access ~~to, from and around the site~~ during construction;
- an assessment of potential impacts of the construction on surrounding buildings and the public domain, including noise and vibration, air quality and odour impacts, dust emissions, water quality, stormwater runoff, groundwater seepage, soil pollution and construction waste; and
- the annual volume of materials to be extracted, processed or stored on site during construction and how the extracted material will be disposed of or reused.

7. Social impact

The EA shall assess the social impact of the proposed additional population on the local services and facilities in the local community.

8. Ecologically Sustainable Development (ESD)

The EA shall:

- identify how ESD principles have been incorporated in the design, construction and ongoing operation phases of the development, and include innovative and best practice proposals for environmental building performance; and
- demonstrate that the development has been assessed against a suitably accredited rating scheme to meet industry best practice.

9. Utilities

In consultation with relevant agencies, the EA shall provide an investigation of the existing utility services and the need for upgrading, augmentation or relocation of those services as a result of the development. This should include the need for electricity supply to the site and undergrounding of all overhead utilities (including all telecommunication services).

10. Drainage and groundwater

The EA shall address drainage issues associated with the development/site, including: stormwater, drainage infrastructure and incorporation of Water Sensitive Urban Design measures, including stormwater and grey water reuse in buildings.

11. Contributions and/or Voluntary Planning Agreement

The EA shall address the provision of public benefit, services and infrastructure having regard to Council's Section 94 Contribution Plan and/or provide details of any Voluntary Planning Agreements or other legally binding instrument proposed to facilitate this development.

12. Contamination

The EA shall demonstrate that the site is suitable for the proposed use in accordance with SEPP 55.

13. Electromagnetic Radiation

The EA shall:

- consider the impact of electronic radiation from the adjacent tower, including any existing and potential future communication facilities, on the proposal; and
- demonstrate the proposed development satisfies the safety limits imposed by relevant guidelines and Australian Standards and whether any buffer areas from the tower to the proposed residential uses are required.

14. Heritage

The EA shall include a Heritage Impact Statement prepared in accordance with 'Statements of Heritage Impact'.

15. Noise and Vibration Assessment

The EA should address any noise and vibration impacts from the Gore Hill Freeway and provide detail of how this will be managed and mitigated through the design of the building, in accordance with relevant Australian Standards and *Interim Guidelines for Development near Rail Corridors and Busy Roads*.

	<p>16. Staging The EA must include details regarding the staging of the proposed development (if proposed).</p> <p>17. Statement of commitments The EA must include a draft Statement of Commitments detailing measures for environmental management, mitigation measures and monitoring for the project.</p> <p>18. Pre-submission consultation statement The EA must include a report describing pre-submission consultation undertaken, including consultation with the local community, issues raised during that consultation and how the proposal responds to those issues.</p>
Plans and Documents	<p>The EA must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the <i>EP&A Regulation 2000</i>. Provide these as part of the EA rather than as separate documents.</p> <p>In addition, the EA must include the following:</p> <ul style="list-style-type: none"> • site analysis plan; • site survey plan, showing existing levels, location and height of existing and adjacent structures/buildings; • locality / context plan; • building envelopes showing the relationship with proposed and existing buildings in the locality; • architectural drawings (to a usable scale at A3); • schedule of proposed gross floor area per land use; • design and access statement; • shadow diagrams; • wind impact assessment; • flooding assessment; • assessment against SEPP65 and the ADG; • ESD statement; • pre-submission consultation statement; • heritage impact assessment; • access impact statement; • traffic and parking assessment; • visual and view impact analysis and photomontages; • physical model; • integrated water management plan; • public domain plans, including a landscape master plan; • sediment and erosion control plan; • preliminary construction management plan, including a construction traffic management plan, construction noise and vibration management plan, construction waste management plan and cumulative impact of construction activities on other nearby sites; • geotechnical and structural report; • services and infrastructure report; and • assessment of electronic radiation impacts.
Consultation	<p>During the preparation of the EA, you are required to consult with the relevant local, State or Commonwealth Government authorities, service providers, and the local community.</p> <p>The EIS must describe the pre-submission consultation process, issues raised and how the proposed development has been amended in response to these issues. A short explanation should be provided where amendments have not been made to</p>

	address an issue.
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