### **ATTACHMENT A**

**TABLE - SUMMARY OF KEY ISSUES** 

# Review of North Eveleigh Concept Plan – Summary of Key Issues

Issue	Comments
Draft Sustainable Sydney 2030 Plan	<ul> <li>Concerns are raised that the North Eveleigh Concept Plan (NECP) falls substantially short of the promise of the Redfern-Waterloo Built Environment Plan (Stage One) August 2006 (BEP), and the opportunities described in Council's Draft Sustainable Sydney-2030 (SS-2030). Further details about SS-2030 are available at http://www.cityofsydney.nsw.gov.au/2030</li> </ul>
	<ul> <li>SS-2030 page 33 provides general comment and alerts to the importance of this site in the redevelopment of the City.</li> </ul>
	<ul> <li>Integration / knitting into city fabric: The BEP, NECP and SS-2030 explicitly and generally express the importance of better integration into the existing city fabric, yet the NECP actually does not propose any bridges to the Australian Technology Park (ATP) across the infrastructure most disruptive to the entire RWA area - the railway corridor.</li> </ul>
	<ul> <li>The bridge to facilitate pedestrian and cycle movements between North Eveleigh and the ATP car park must still be provided. This bridge formed part of a previous DA consent approval for the performing arts centre (Carriageworks Site).</li> </ul>
	<ul> <li>Sustainability (Cogeneration): SS-2030 "Strategic Direction 2" emphasises the medium term importance of dispersed energy generation - "Green Transformers". Best placed in redevelopment sites, this technology can assist the achievement of greenhouse gas reduction targets that the nation (and planet) must reach. Cogeneration is a technology that is best considered at the overall master planning (concept planning in this instance) stage. The NECP discusses some initiatives - principally regulatory - but postpones elaboration of real initiatives until lodgement of subsequent DAs. Specifics regarding this should be included in the Concept Plan.</li> </ul>
	<ul> <li>Affordable housing: SS-2030 "Strategic Direction 8" explores affordable housing and the extent of commitment needed to reach targets essential to the social equity and harmony of Sydney. Concern for affordable housing is a key opportunity on page 10 of the BEP; however targets are left out of the NECP. Therefore in accordance with the targets in SS-2030, it is recommended that of all housing 7.5% will be social housing, and 7.5% will be affordable housing delivered by 'Not-for-Profit' or other providers.</li> </ul>

- The RWA has indicated that the North Eveleigh site will be the location of significant affordable housing associated with the renewal of the broader Redfern and Waterloo area (documented in the RWA's Built Environment Plan), including contributions for affordable housing from the former CUB site and the former Rachel Foster hospital site.
- The concept Masterplan for the North Eveleigh site confirms that a 'significant proportion' of housing on the site will be affordable housing; however there is no indication of the location, quantum or design of the affordable housing. The City supports the provision of affordable housing on the site and requests information on the location, quantum or design of the affordable housing.
- The City strongly encourages affordable housing that is also accessible (in line with the objectives of the City of Sydney Access Development Control Plan 2004) and culturally appropriate.
- Street hierarchy and "fine grain": SS-2030 "Strategic Direction 9" identifies the extent of attention needed to achieve genuinely attractive places to live and work. The NECP pages 36-40 discusses many of these attributes in detail but Concept Plan Approval is not sought for these attributes (refer page i). If the merit of the discussed built form attributes is to be considered as weighing in favour of the granting of the Minister's approval then the merit should be "locked in" to the approval (refer also Page 3 "Built form / Urban Design first dot point).
- Open space: Some open space is proposed and this is additional to that identified on page 27 of the BEP. However, there is a recognised shortfall of accessible open space in the vicinity. Better (or any) connections across the rail corridor would provide access for future residents to open space within the ATP and beyond to Alexandria Park and Erskineville Park. Yet no connections are actually proposed in the NECP. Guidance relating to develop a network of safe, linked pedestrian and cycle paths integrated with green spaces throughout both the City and Inner Sydney can be found in SS-2030 "Strategic Direction 4".
- There is no large scale parkland. This section of Darlington has no large parks at present (the nearest being Victoria Park which is some 600m away to the north). The amount of parkland proposed does not compare well to recent Brownfield developments such as Victoria Park, Zetland.

- The design of the new open spaces is critical to the renewal process and social outcomes. The design of the new open spaces needs to specifically accommodate resident and workforce populations and surrounding communities and include play opportunities, active recreation (in addition to cycling and walking) and quiet spaces for eating, reading and reflection (including lunch time use).
- Active reaction opportunities for the high numbers of children and young people that will live on the site and in the immediate neighbourhood need to be accommodated in the new publicly accessible open spaces. The spaces should be designed to be robust and to withstand high impact activities including skating.
- No detailed design of open spaces has been provided as part of the concept Masterplan. Concerns are raised that the proposed publicly accessible open space is in the form of building separation / forecourts etc rather than genuine useable public open space. In addition, concern is raised that some of the proposed spaces would be of substandard size to be legible and properly utilized by the community and in some cases compromised by such issues as poor accessibility and / or rail noise.
- "Interim guidelines for councils: consideration of rail noise..." published by Railcorp identifies a zone within 60 metres of the track as requiring assessment of the impacts of rail noise on redevelopment. The rail corridor to the south of the subject site carries most of the passenger traffic to and from Sydney (exceptions being the North Shore line, the Waterfall line and the Airport line). Rather than proposing less noise-sensitive uses (e.g.: noise screened offices) within this zone the unacceptable intention is that approval be granted for about 50% of residential redevelopment within this curtilage, with the provision that assessment of this impact can safely await lodgement of subsequent detailed applications. The inclusion of noise mitigation strategies in any approval is critical. Detailed consideration should also be given to the appropriateness of uses at this stage and mitigation measures to both internal and external spaces. This as is the inclusion of sound insulation is reasonably likely to detract from natural ventilation (sought in the Residential Flat Design Code) and from the quality of these spaces.

<u>Links to Redfern village</u>: SS-2030 "Strategic Direction 6" explores the benefit of paying attention to "hubs" - activity centres that have both a local and global relevance. The BEP makes similar observations about the importance of Redfern village. Yet the NECP depicts redevelopment of one of the largest precincts as largely isolated from this centre (refer discussion above). Consequently, without better connections to and from the site, components such as the proposed supermarket and other employment activities are inappropriate as they will not contribute greatly to this centre.

### Heritage

- The heritage impact of the proposed apartment buildings on top of the Paintshop has major heritage impacts. It appears to require demolition of most of the south (railway line) elevation of the building. This is the principle facade seen by the public: the thousands of rail commuters that pass on this side far exceed the number of likely daily visitors to the site itself so the conservation of this elevation is crucial.
- The siting of these towers over the large single storey floor plate of the paint shop is working against the language of this building and will adversely affect the interior by complicating the space with lift and stair shafts and structure. Heritage aside, the addressing of the residential towers appears highly problematic as they are reached from a service road facing the rail line.
- The proposed use of the ground floor of the Paintshop for supermarket and parking is compatible with its nature and could be potentially acceptable as a heritage outcome.
- The proposed adaptation of the Chief Engineer's Office
  Building to residential use is inappropriate due to the
  extensive intervention and subdivision required. The
  extensive new walls, bathrooms and external escape stair
  are intrusive. Given that the building was originally
  designed as an office, adaption and re-use as a
  commercial office would require less change and be a
  better fit to this building.
- The proposed adaptation of the clothing store to residential use is potentially acceptable but, as with the Chief Engineer's office, commercial may require less physical intervention and be a better fit to the office.

- The extent of new buildings proposed over the 'fan-of-tracks' east of the Paintshop is likely to have major impacts on both fabric and the ability to interpret this highly ranked heritage feature when on the ground. A reduced number of buildings should be placed in this area and should be concentrated in the north east area toward the tower so that the full extent of the fan can be appreciated at its widest point to the east of the paint shop.
- The proposed 16-storey 'landmark / iconic' building is inappropriate as it will interfere with the Vine Street vista termination of the Chief Mechanical Engineer's (CME) building by removing the cartilage of sky above the roofline. A building of this nature would also unacceptably remove views of the CME building from the south.

### Site planning and built form

- The development should accord with the suggested separation distances in Residential Flat Design Code to ensure potential overshadowing, loss of privacy and outlook for future residents and adjoining residents is minimised. The proposal should also comply with the Solar and Daylight Access controls in the South Sydney DCP 1997.
- It is noted that in relation to permissible heights, the
  proposed scheme does not achieve maximum heights in
  some areas of the site. In other instances it has been
  necessary to exceed permissible heights and to redistribute
  heights across the site to achieve the best urban design,
  planning and commercial objectives. This approach is
  generally acceptable subject to mitigating any impact of the
  amenity levels of nearby residents.
- It is noted that the maximum permitted floor space area in the central portion of the site is exceeded by 3,448 sq m, and that this exceedence is due to the intended allocation of an additional floor space in the Carriage Workshop building (12,000 sq m) and Blacksmiths Workshop (1,000 sq m), to ensure the adaptive reuse and development potential of both these heritage items is maximised. This approach is acceptable given that the additional floor space will be contained within existing buildings with no visual and heritage impacts whilst offering a sustainable development outcome through the adaptive reuse of existing buildings.
- At the Project Application Stage the detailed design of the development shall exhibit design excellence, incorporate ESD initiatives that achieve 'world's best practice', and take into consideration a number of matters relating to design quality, including the 10 Design Quality Principles, as outlined in SEPP 65.

	The development shall integrate with the existing / retained uses on the site, and particularly the Carriage Workshop building (Performing Art Centre) and Blacksmiths Workshop.
Subdivision	It should be noted that any subdivision of the site will require separate applications to obtain consent from the Consent Authority and subsequent issue of the Subdivision Certificate by Council (City of Sydney) under Part 4A (Sec. 109J) of the EP & A Act 1979.
Traffic impact	The traffic generation rates, mode split rates and car occupancy rates do not appear to have been undertaken as per the RTA Guide to Traffic Generating Developments and known occupancy rates.
	<ul> <li>The traffic modelling does not appear to accurately reflect the existing traffic situation on the surrounding state road network, nor take into account long standing proposals to Close Sheppard Street and Ivy Street both north of Abercrombie Street, and Butlin Avenue within the University.</li> </ul>
	Discussions between the RWA and the State Transit Authority (STA) and City Rail to ensure that an increase in public transport can be provided to deal with the increased patronage. A long term mode choice is usually made soon after a new trip is created, the RWA should ensure that all public transport upgrades are available as close to the site being occupied as possible.
	The Concept Plan makes the assumption that no traffic exiting the site will use Queen Street as a link to access King Street. The Council has been made aware that since the Carriageworks site has become occupied the traffic volumes on Queen Street have increased as a result. It is therefore not suitable to assume that no site traffic will use Queen Street without some form of traffic management measures. Since we do not wish for traffic to use Queen Street, RWA will need to design and install suitable traffic management to prevent site traffic using Queen Street. All designs should be approved by Council prior to installation. All measures should be in place prior to occupation of the site and at no cost to Council.
	<ul> <li>The Council has received a number of correspondences from concerned residents in Erskineville relating to the volumes of development traffic that will be moving within Erskineville Village. The RWA should undertake a review of the traffic impact the development will cause to Erskineville Village avoiding the use of residential streets where possible.</li> </ul>

- The entire Darlington Precinct is covered by a 3 ton load limit which therefore limits large trucks to using only the most direct route to the site. Golden Grove Street is the most direct route, from the site to the nearest State Road, and was therefore nominated as the service route for the already approved Carriageworks site and the nearby Macdonaldtown Stabling Project. The RWA should ensure that all heavy vehicle traffic will be directed along Golden Grove Street.
- All loading and unloading must occur entirely within property boundaries. No on-street loading zones will be approved as the availability of such zones can not be guaranteed.

#### Road Design

- The following elements are critical to enable a proper assessment of the development:
  - All roads (public) within the North Eveleigh Site must be designed to meet "Australian Model Code for Residential Development" (AMCORD) standards.
  - b) The new roads within the site must be designed with on-street parking on both sides of the street as provided on the majority of all standard public roads. A change to this arrangement will require an appropriate traffic reason to be given either through the site's Kerbside Parking Restriction Plan or the Traffic Management plan.
  - c) Retail, Commercial and Entertainment traffic within the site should be separated wherever possible, so that it does not travel through the residential sections of the site and therefore causes a disturbance.
  - d) The City of Sydney supports and encourages the inclusion of Shared Zones wherever possible. The developer must review and assess each street proposed as a Shared Zone to ensure compliance with the Roads and Traffic Authority's Technical and design requirements for Shared Zones.
  - e) All proposed Shared Zones must meet the RTA's Technical Directives. This would include (at present) issues such as the Shared Zones being designed to create a physically self-enforcing 10km/h speed limit environment which only carries traffic volumes less than 300 vehicles per day and has a length that is less than 250 metres for each Zone and carries no trucks or coaches
  - f) Any road that is not a Shared Zone must be designed to suit a 40km/h speed limit.

#### Road Dedication

- The Council has not entered into an agreement to accept a transfer of the land, or to maintain the whole in the future.
   The standard of construction (including compatibility within the existing road network) is of importance to the Council in reaching an agreement to accept transfer of such infrastructure.
- To date, insufficient, co-ordinated details have been provided with regard to critical aspects to enable a proper assessment of this element of the proposal.
- The developer must only dedicate these roads to Council once the following actions have been carried out:
  - a) 75 % of the residential component of the site is occupied and the occupants are satisfied with the road arrangements.
  - b) A Traffic Management study for the roads within the site has been undertaken. Approval will then need to be obtained from both the Sydney Traffic Committee and the City of Sydney for the results of this study. All approved devices for roads within the site must be installed in accordance with RTA Technical Directives (e.g. pedestrian crossings, speed humps etc).
  - c) Preparation of a Kerbside Parking Restriction Plan in accordance with RTA Technical Directives which ensures parking is allocated for short-stay parking. This Plan must be approved by both the Sydney Traffic Committee and the City of Sydney. To eliminate the use of the area by long term commuter's unrestricted parking spaces must not be provided.
  - d) Approval from the Roads and Traffic Authority has been obtained for all the proposed Shared Zones.
  - e) A pedestrian safety and access audit (e.g. PAMP study) must be carried out for all roads within the site.
- Any proposal to dedicate roads to the public, vested in Councils ownership will require that all associated certified engineering, plans and documentation for civil works, road design and construction, stormwater and floor mitigation design and construction and landscaping be approved by Council and prior to acceptance of any such dedication, all associated works are to be completed in accordance with the requirements and to the satisfaction of Council.

 All such designs and works are to be in accordance with Council's Development Specifications for Civil Works Design and Construction and Council's Public Domain Manual.

### Pedestrian and cycle issues

- As mentioned earlier, the bridge to facilitate pedestrian and cycle movements between North Eveleigh and the ATP car park must still be provided.
- Wilson, Abercrombie and Codrington Streets form part of the City's cycleway network laid out in the City's adopted Cycle Strategy and Action Plan 2007 - 2017. Wilson Street is proposed to have separated cycleway constructed on the North Eveleigh development side of the road for the section between Ivy Street to Burren Avenue. Any reconstruction of the roundabouts to enlarge them in this section of road would have a negative impact on the City's cost of construction for the separated cycleway, and therefore can not be supported.
- Golden Grove Street is a key access corridor from King Street and disability access to the site must be provided at this location.
- Whilst it is understood that there is a substantial level difference between Wilson Street and the site, most of the proposed pedestrian access points from the north are resolved through multiple flights of stairs. The only visible attempt to provide an accessible entrance has been at the far eastern end of the site through a switchback ramp. Accessible access should also be provided to the central and western site precincts.
- The highest level physical accessibility of both public and private domains should be a design objective. Accessible local public transport is also a priority.
- The Carriageworks site, being a performing arts centre, and the proposed supermarket near to this site requires disability access from Wilson Street near Codrington Street.
- The increased traffic and pedestrian movements in the area will require pedestrian facility upgrades across and along Wilson Street. The applicant shall submit a plan to Council showing all proposed pedestrian facility upgrades along Wilson Street. These upgrades will be installed prior to occupation of the site and at no cost to Council.

### **Parking**

- Currently the site contains existing parking facilities provided for cars, coaches, taxis, accessible parking spaces, and turning areas which service the needs of the existing Performing Arts Centre (Carriageworks Site) and the Blacksmiths site. These facilities must be retained and clearly marked for their use only. These facilities formed part of a separately approved development consent and will still be required for the continued use of this area of the site.
- The City is keen to promote more sustainable modes of transport and to reduce the impact of private car ownership so car share parking spaces must also be provided in a publicly available location within the site.
- All occupants (including residential and commercial) will not be eligible for any City of Sydney parking permits.
- The City will not consider changes to parking restrictions on Abercrombie, Lawson or Shepherd Streets as part of this development as these streets are local streets and the City does not wish for them to carry any more traffic.
- Parking rates are to comply with Central Sydney DCP and South Sydney DCP 11.

### **Housing diversity**

- <u>Unit mix</u>: the provision of two, three and four bedroom units to support families and group household living in the City is encouraged.
- Culturally appropriate housing: the City's adopted Social Plan identifies culturally appropriate housing as a priority area of need for Aboriginal and Torres Strait Islander communities. One of the largest urban Aboriginal and Torres Strait Islander communities in NSW are located adjacent to and in close proximity to the proposed redevelopment site, in poor housing conditions that include overcrowding.
- Culturally appropriate housing for Aboriginal and Torres
   Strait Islander people includes (but are not limited to) the
   following features, greater numbers of bedrooms, multiple
   toilets, living spaces that can also be used for guests to
   sleep and outdoor space of socialising (including cooking)
- Future affordable housing on the North Eveleigh site should include a substantial component of culturally appropriate housing for Aboriginal and Torres Strait Islander communities.

### Community facilities

- Child care: the documentation indicates a 45 place child care centre will be provided to meet the needs of the projected 71 children aged 0-5 years, who will reside on the site. It is proposed that the centre will be open to families and children who do not reside on the site also.
- The City's child care needs analysis confirms that the greatest need is for places for children aged 0-2 years. The need for work-based child care is also growing in the City of Sydney. The affordability of child care is a further factor that should be considered.
- The City's Child Care Centres DCP should be used to guide the design of the child care centre.
- The provision of on-site child care, compliant with the City's Child Care Centres DCP, to meet the needs of future resident and workforce populations on the site and open to other families, is supported.
- Community Centre: the documentation indicates the adaptive reuse of the Scientific Services building (833 m²) as a community centre. The provision of community facilities to support community development of both the future resident and workforce populations on the site and surrounding communities is supported.

## Local employment and training

• The proposal includes employment (and training) of Aboriginal people, through the Redfern Waterloo Authority's existing Aboriginal employment programs. This is strongly supported. Employment and training opportunities should also be made available to other local people. The timeframe for the redevelopment, nine years, provides significant opportunity for the training and employment of local people. A partnership with local schools, including the Alexandria Park Community School, Eora TAFE and other tertiary institutions should also be considered.

### Community demographics and development

- Analysis of the demographics of the future resident population (projected to be 2400 people) should be undertaken and applied to design considerations.
- Consideration to the community development needs of the new resident population, beyond the community centre and during the renewal process is required.

### Staging

- The submission notes that staging outlined in the Concept Plan is indicative and will be subject to market conditions. Council believes the staging should also have regard to a logical flow of building, so as to minimise the impacts of construction damage to completed sections, as well as preserving adequate construction access to subsequent stages;
- The current indicative staging plan raises a number of potential issues, including:
  - a) Stage 1b includes construction of the middle portion of a proposed public road, but not the adjacent reservations on both sides that would be deferred until stage 5b potentially some 5 6 years later
  - b) A small area on the northern edge of the site (near Codrington Street) on the staging plan is blocked out but not attached to any particular stage.
  - c) Stage 4D at the far eastern end of the site may be difficult to access without damage to stage 4C, containing the public forecourt / park area.
- What is intended within each stage is unclear e.g. construction and dedication or just construction? The Council may have issues accepting dedication of land that will be subject to later construction traffic, without a community to serve.
- Information about the staging / construction of the proposed pedestrian over bridge should also be provided as soon as available, pending the outcome of the separate application.

#### It is recommended that:

- clarification of staging inclusions, i.e. whether just construction, or construction and dedication is envisaged with each stage
- consideration to be given of subsequent stage construction impacts and access when determining the staging plan, not just market forces
- consideration to be given to the practicalities of staging, with particular reference to the current proposal to split delivery of an access roadway in two stages, some 6 years apart.

### Open space / Conflict with vehicles

- The report claims that approximately 20% of the overall site area will be for open space (public and private) and landscaping. It is assumed this includes the shared roadways. Council does not agree that what will essentially be roads with traffic calming obstacles and on street parking, even if they are intended to prioritise pedestrian use, qualify as effective open space areas. One of the traversers for example is proposed as part of the "open space" network, but will also be used for access and unloading of semi-trailers. The details of this type of use are unclear (i.e. whether it will be managed or restricted to certain times of the day), but this would seem to be a fairly incompatible use with open space in the true sense.
- Better, more detailed communication of proposed circulation routes and treatments will be required to enable proper assessment of this issue. Council does not feel particularly well informed on proposed arrangements for cycling through the site as mentioned in the reports, or how this network will ultimately link up with the City's plans cycleways (e.g. the proposed separated path to Wilson Street).
- It is also noted that some of the proposed public shareway
  areas are intended to be punctuated with bollards to
  separate pedestrian and vehicular circulation routes (e.g.
  refer to the eastern forecourt area). Further discussion
  should be undertaken with the Council during design
  development as to how these uses should be delineated.
  In general, the Council tries to minimise use of bollards in
  public spaces.

### Open space amenity, circulation & access (Legibility)

- The Landscape Strategy for the site (Appendix C, prepared by Turf Design Studio and Jeppe Aagaard Andersen) describes a pedestrian / cycle oriented setup of legible open spaces connected by a main access street (Carriageworks Way running east-west). Spaces include pedestrian squares, courts, corridors and pocket parks as well as more major publicly accessible spaces.
- The report also refers to major north-south axis designed to connect the proposed Carriageworks Way with Wilson Street and beyond. Major north-south pedestrian entries are envisaged off Wilson Street at the termination of Forbes Street, Codrington Street (roughly aligning with Traverser 1), Shepherd Street and Ivy Street at the eastern end of the site. Others are proposed off Wilson Street aligning with Traverser 2, and between proposed residential blocks north of the Paintshop and Fan of Tracks.

The arrangements or separation of proposed public and private spaces are not particularly clear, and one use seems to bleed straight into another. It is not clear how (if at all) private (e.g. communal residential) and publicly accessible open spaces are to be separated - either physically or visually. The overall design of the open space areas, including publicly accessible and private, is heavily fragmented and results in a number of small, narrow spaces. The Council is not convinced about how they will be used and the amenity they will offer. Further discussion / design detail will be required for these spaces, particularly those intended to be dedicated. It is recommended that the plan: consider or provide accessible entrances to the central and western site precincts > provide a clear outline of proposed circulation for all modes of transport (pedestrian, cycle, vehicular) and how separation of use will be achieved, taking into account the City's desire to avoid a proliferation of bollards Solar access of The solar access studies in Appendix D indicate that many open spaces of the proposed open spaces, including those to be dedicated for public use, are heavily affected by shade for large parts of the day. The worst affected site appears to be the proposed dedicated public park to the south-west frontage of the 16 storey tower, which is affected throughout summer and winter. In general, the Council seeks to maximise solar access to open spaces. Further discussion / design detail will be required for these spaces, with the relocation of affected spaces preferred. Leftover spaces It is not clear how the RailCorp access areas around the southern site boundary will be used / finished and how they will integrate with adjacent uses / finishes. This should be addressed in further detailed applications. Similarly, the interface between the site and the existing property at 501 Wilson Street may benefit from further consideration / better integration. Further discussion should be undertaken with the Council during design development as to how this matter can be addressed. Land dedication of It is noted that several areas are nominated for dedication public space to the City, either in full or in stratum. It is noted that a commitment is made in the report that roads are to be constructed to City of Sydney standards / specifications, and this should be enforced. At the moment, the shareways seem to be proposed in concrete.

- Further consultation about the proposed treatments and finishes to roads and parks proposed to be dedicated will be required with relevant sections of Council. Further information should be provided about possible water features to some of the proposed public parks; the proposed rolling raised planters and rail carriages to be possibly mounted on the tracks; design of the proposed green walls (it is noted that some of them are to be facing due south which may not be ideal for sustaining plants and probably not something the City would support in a publicly owned space); areas of deep soil versus on-slab planting; the proposed Water Sensitive Urban Design measures and bioswales and general finishes, such as the proposed concrete paving and banding.
- The proposed "public space" also seems to include dedication of car park entries, including some ramps into underground car parks under the buildings. This should be the subject of further discussion with the Council.
- Other parts of the proposed dedication public space are very small, isolated or directly abutted with private open space or wedged between proposed buildings; or are illdefined (e.g. some areas shown on the Land Dedication Plan in Volume 1 of the submission show what can only be described as a ragged boundary between some proposed open space and proposed road).
- Any proposal to dedicate public space, vested in Councils ownership will require that all associated certified engineering, plans and documentation for civil works, design and construction, stormwater and floor mitigation design and construction and landscaping be approved by Council and prior to acceptance of any such dedication, all associated works are to be completed in accordance with the requirements and to the satisfaction of Council.
- All such designs and works are to be in accordance with Council's Development Specifications for Civil Works Design and Construction and Council's Public Domain Manual.

#### It is recommended that:

- further discussion should be undertaken with Council to address issues such as:
  - separation of public / private open space, in areas where they are proposed to directly adjoin one another
  - o relationship between building entries / uses and the interface with proposed public open space there much be clear separation of these areas so that public space is recognised as public space and not appropriated by the building as part of its forecourt

	o understanding of what lies underneath proposed dedication areas in stratum.
Existing public domain impacts	Despite the scale of the development, there is little if any discussion about the impacts on the surround public domain / streetscape and how this will be managed / protected
	<ul> <li>The Council would expect that an upgrade of the surrounding street frontages would not only enhance the finished product and integration of the development, but would address any construction impacts on the existing public domain. These frontages (and any other areas affected by associated works) should also be protected from damage.</li> </ul>
	It is recommended that:
	Landscape / Public Domain Design:
	address fragmented and overshadowed spaces
	<ul> <li>provide detail of deep soil and on-slab planting areas for the entire site</li> </ul>
	<ul> <li>provide further detail on the proposed treatment of adjacent spaces, such as the RailCorp access to the south of the site and interface with existing properties, such as 501 Wilson Street</li> </ul>
	<ul> <li>provide further detail on proposed landscape treatments and finishes, including the Water Sensitive Urban Design measures and bioswales</li> </ul>
	<ul> <li>refer to City policies/guidelines such as Sydney 2030; Sydney Streets Design Code; and Parks Technical Manual to help shape the design of intended public spaces</li> </ul>
	provide indicative approach to lighting design.
	Existing Street Impact:
	<ul> <li>include upgrade of existing, surrounding street frontages as part of the development works</li> </ul>
	as a minimum, include a requirement for a damage deposit / security payable to the (public domain landowner) to cover possible construction damage to the surrounding public domain areas and those affected by associated works
	<ul> <li>It is noted the statement of commitments with the submission includes an intention to further discuss resolution of the public open space / landscaping, dedication and remediation issues with Council (and other bodies). This should be upheld.</li> </ul>