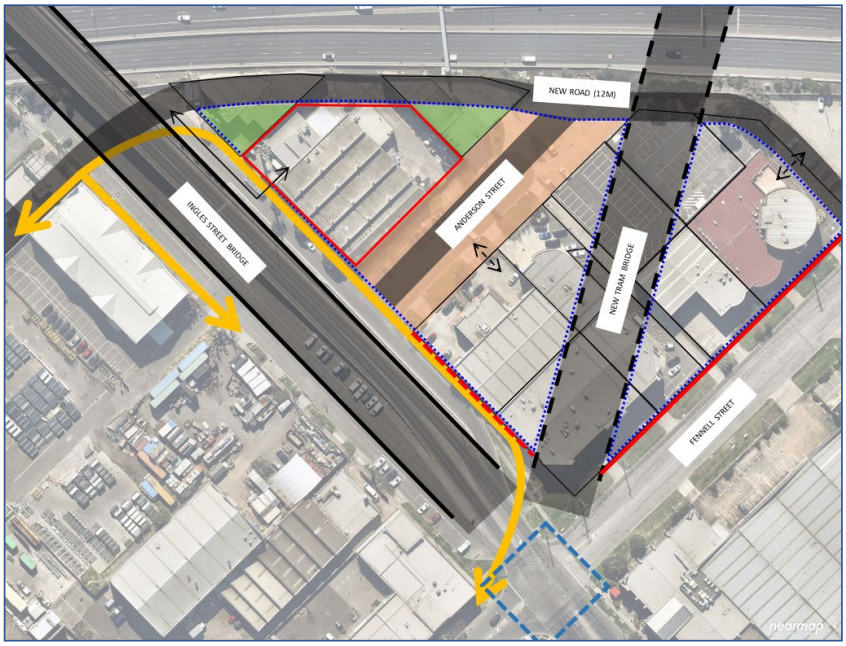
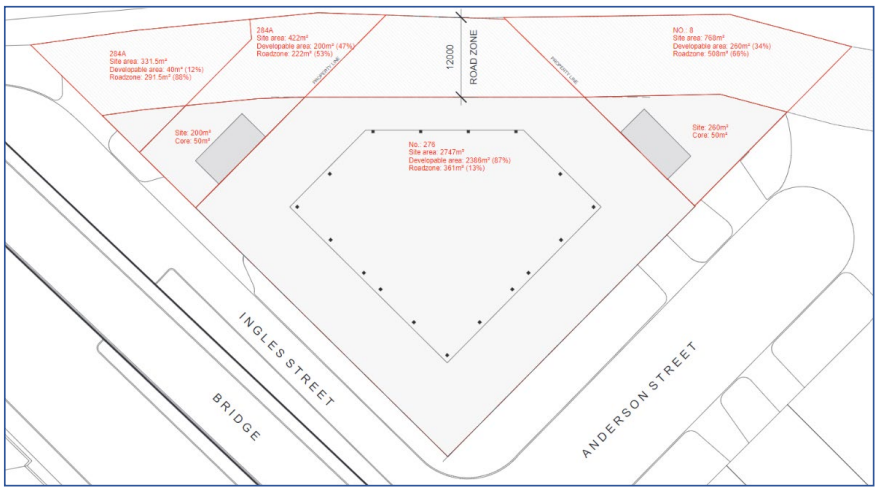
ATTACHMENT 10

City of Port Phillip Internal Referral Responses RE: 04-10-2021 Drawings

276-284 Ingles St, PM: DELWP Ref: PSA C201port, CoPP Ref: 1/20121/MIN

Heritage	No heritage issues with this site
City Strategy	Thanks for the opportunity to provide further input on this development proposal. Apologies for the delay. 1. The development is proposing to heavily utilise the Anderson Street reserve to transition up to the required Ground Floor levels for flood management. I'm not convinced that this is the best use of this road space (being 13.8 out of the 30m wide road reserve); particularly as it will be extensively overshadowed by the proposed building (refer to shadow diagrams in the architectural plans) and there are limited uses to encourage activation of this space. Further, this area doesn't need more sealed / impermeable spaces, but more green, cool and water-sensitive spaces. For the purpose of this application, I recommend that any works within the public realm are not approved, but subject to future design to Council's approval. 2. The proponent is also proposing to provide 2 small public open spaces on the portions of 8 Anderson Street and 284 Ingles Street that would remain after the future service road is provided (shown as green in the top sketch below). It is assumed that the proponent proposes to purchase these properties; only to then 'give them away' for either road or park? It is unclear why the proponent would make such a contribution – is this seeking a 'net community benefit' to balance another non-compliant aspect of the proposal? The analysis included in the Urban Context Report (pp. 173-176) indicated that development yield is possible on these balance sites up to 6 storeys. On this basis, it is imagined that the proponent could reasonably incorporate this potential building envelope into an expanded building podium. This outcome would increase floor areas by up to 600sqm (including 2 x core areas that wouldn't be required; refer to bottom diagram extract below) across up to 6 levels – increasing saleable non-residential space and potentially improving the efficiency of car parking, service and amenity areas. I consider that provision of these small public open spaces are not justified. In my view, it would be of greater benefit to incorporate these spaces into the building to provide greater non-residential floor space (which could include (1) affordable workspaces and (2) uses that will increase activation of the public realm on Anderson Street. 



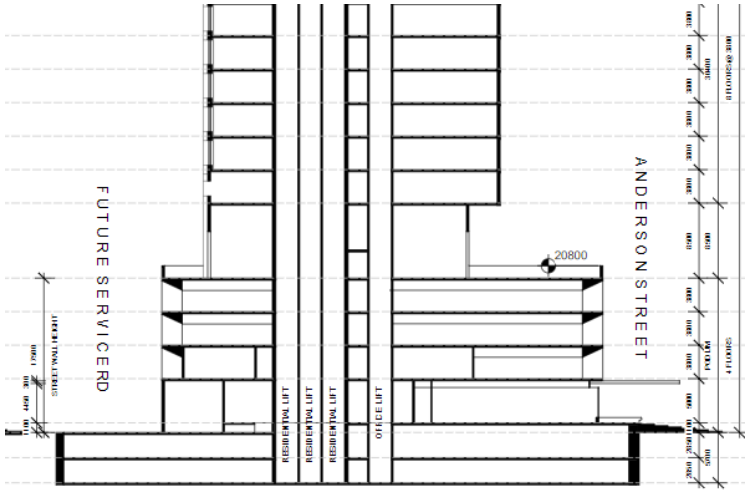
3. Has the proponent prepared a wind assessment yet? As I outlined in my advice on 27 April, I suggest the following information be included in the RFI to provide clarity on the requirements:

   The wind assessment required under Clause 2.11 of DDO32 needs to include wind tunnel modelling and must address the following requirements:

   - The assessment distance used in accordance with Clause 2.11;
   - Address existing and future publicly accessible areas within the assessment distance;
   - Address approved and proposed development within the assessment distance (those identified in the Urban Context Report but updated to include more recent proposal particularly that on the opposite side of Ingles Street (Nos. 261 & 277-281));
   - Application of different wind comfort criteria to the following publicly accessible areas within the assessment distance:
     - Sitting:
       - Existing and future public open spaces;
       - Areas intended for outdoor seating within the subject development and approved / proposed developments;
       - Areas intended for outdoor seating within communal open space;
     - Standing:
       - Footpaths of existing and future streets;
       - Outside retail / commercial tenancies and pedestrian entry areas within the subject development and approved / proposed developments;
       - Remaining communal open space areas except for those solely designed for access; and
     - Walking – remaining publicly accessible areas.
   - Where these criteria are exceeded under existing conditions, the development must not worsen the wind situation.
   - Wind management treatments must be located within the development site.
   - Wind management treatments must not impact on required urban design outcomes (e.g. accessibility or surveillance opportunities); and
   - Evidence that wind management treatments will successfully achieve required wind criteria.

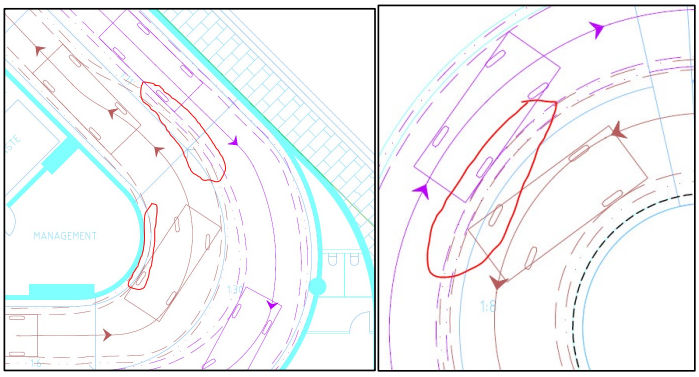
4. In response to you and Brendan's comment that "*the reduction in articulation of the top 3 tower elements is reduction in design quality for significant new landmark building on the skyline. A greater difference in heights should be re-instated as per earlier schemes*". I note that it appears some additional height may be possible without compromising the mandatory overshadowing requirements (North Port Oval; as indicated in the shadow diagram below).

	
Urban Design Architect	… very much agree with suggestions ….. from (City Strategy). Our urban design comments on the updated design were all discussed at P&D review and generally align with earlier referral advice. In summary: **Urban Design** The reduction in articulation of the top 3 tower elements is (a) reduction in design quality for (a) significant new landmark building on the skyline. A greater difference in heights should be re-instated as per earlier schemes. **Lower levels relationship to Public Realm** The lower levels contain few public and active uses and have relatively weak relationship to public realm for such as large building. Further work to increase public and active uses to these spaces is recommended. **On-site and off-site Public Realm Improvements** Improved quality and extent of public realm works are requested to provide suitable amenity for building occupants and to demonstrate community benefit. **Traffic Safety** Significant safety concerns about driver's sightlines and movement on the spiral ramp have been raised. Resolving these must take precedence over any perceived design merit of the spiral ramp form, which mainly relates to its scenographic and novelty value. **Detailed Architecture** The tower facade's mix of solid and glass elements are logical and well proportioned. This appears to be a positive strategy in terms of sustainability and residential amenity. The internal apartment layouts are appropriate, including winter garden spaces.

Sustainable Design	I have reviewed the updated Sustainable Management Plan by WSP, dated 01/10/2021. I am happy with the contents and the response to our previous sustainable design referral comments, on pages 1 and 2 of the document, is acceptable. I note the SMP proposes to achieve two separate Green Star certifications, one for the commercial component and another for the residential component of the building. Such an approach would be subject to agreement from the Green Building Council of Australia. I have also reviewed the updated Water Sensitive Urban Design (WSUD) Assessment by WSP, dated 04/10/2021. The WSUD response addresses the mandatory rainwater tank sizing requirements at Clause 4.3 of Schedule 1 to the Capital City Zone (CCZ1). However, the WSUD Assessment states that the tank water would be used for toilet flushing for the commercial component of the building. **Note** that the mandatory tank and third pipe conditions at Clause 4.3 of CCZ1 require the rainwater tank to be connected to all non-potable outlets in the building via the building-wide third pipe network. The hierarchy of water use for non-potable demand within the building must be as follows: Rainwater tank water first until exhausted, then use of recycled water supply from precinct-wide recycled water system (once available). Water from the rainwater tank must be continually drawn-down to ensure that the tank contains sufficient storage capacity in the event of a significant storm/rainfall.
Building	I have reviewed the proposed architectural drawings provided and note that there are some "deemed-to-satisfy" non compliances. These issues will very likely be dealt with under the performance provisions of the Regulations (e.g. fire engineering / accessibility consultant) and will likely not impede the building approval process. I note further that the development is likely to undergo further design development however I believe a building permit could be obtained with minor alterations or further information / clarification provided as part of the relevant building surveyor's ongoing review of the design.
Subdivision Officer	I've reviewed the architectural plans provided and advise that there are major issues with the proposal to create a 12m wide Road with two basement levels for car parking underneath. Section BB shows that the basement would project underneath the proposed 12m Road.  2 Section BB 1 : 400 If the Road is to operate as a normal Council Road, the land above the basement would be transferred to Council as Road. The Road would need to be constructed to Council's standards by the developer, then would be maintained by Council for the foreseeable future. Council's Road maintenance requirements are often couched in 5 year, 10 year and 50 year maintenance periods. If the basement is located beneath Council's Road it would need to be maintained as structurally sound to allow the day to day use of the Road including heavy vehicles and the maintenance and reconstruction of the Road over the same period.

	I don't know if it is possible to specify the standard of construction of the basement in a planning permit to ensure it is suitable to carry heavy vehicles above the Road. If the basement is constructed to allow heavy vehicles and future reconstruction of the Road, Council will need to ensure that the basement is maintained to ensure that the Road is safe and fit for purpose for the life of the building and beyond. We have previously included a condition requiring a Section 173 agreement to ensure that a basement beneath a Council Road is maintained and insured. The following are the conditions included in a subdivision permit which included a Road to be constructed over a basement (please note that the Road section was 1.29m wide): 1. *Amended plans required* *Before the plan of subdivision can be certified, amended plans to the satisfaction of the Responsible Authority must be submitted to and approved by the Responsible Authority. When the plans are endorsed they will then form part of the permit. The plans must be substantially in accordance with the plans described as PS 805580R Version 11 but modified to show:* ….. *(d) The depth of the Road to be vested in Council to accord with the underside of the Road as approved by the Responsible Authority.* *Road Widening* 3. *Prior to certification, engineering plans for the construction of the Road to be vested in Council must be submitted to and approved by the Council. The plans must include all road construction details including drainage and finishes.* 4. *Prior to the issue of the statement of compliance the owner of the land must:* *a) Enter into an agreement under Section 173 of the Planning and Environment Act 1987 with the City of Port Phillip;* *b) Register the Agreement on the Title for the land in accordance with Section 181 of the Planning and Environment Act 1987; and* *c) Provide the City of Port Phillip with the dealing number confirming registration on the Title.* *The agreement must be in a form to the satisfaction of the City of Port Phillip, and the owner must be responsible for the expense of the preparation and registration of the agreement, including the City of Port Phillip's reasonable costs and expense (including legal expenses) incidental to the preparation, registration and enforcement of the agreement. The agreement must provide the following:* *(i) The owner must, at its cost, maintain the basement including beneath Council's Road in a structurally safe condition to ensure the integrity of Council's Road above to the satisfaction of the City of Port Phillip and to the same standards as is required by the City of Port Phillip for the adjoining road(s);* *(ii) The owner must maintain sufficient funds or insurance to ensure that the basement can be maintained or repaired as required to ensure the integrity of Council's Road above to the satisfaction of City of Port Phillip and to the same standards as is required by the City of Port Phillip for the adjoining road(s);* *(iii) The owner must undertake or cause to be undertaken a periodic inspection by a suitably qualified engineer of the basement and City of Port Phillip's road above to confirm the structures are in sound and safe condition and identify any repairs necessary to ensure the integrity of Council's Road above;* *(iv) The owner must provide to the City of Port Phillip a copy of the engineer's inspection report under (iii) within 7 days of a written request by the City of Port Phillip;* *(v) If the engineer identifies any repairs necessary to the basement to ensure the integrity of the Council's Road above, the repairs must be undertaken as a matter of urgency and evidence of the completion of the repairs must be provided to City of Port Phillip within 7 days of the repairs being completed together with a report from the engineer confirming that the basement and the City of Port Phillip road above are in sound and safe condition; and* *(vi) The owner shall indemnify Council and all users of the Road above the basement from any damage to the Road above the basement, the basement area beneath the Road and the basement.* 5. *Prior to the issue of the Statement of Compliance, the Road to be vested in Council must be constructed to the satisfaction of the Responsible Authority.* As stated those conditions were for a 1.29m section of Road, which was effectively a widened laneway. A 12m wide Road would normally allow multiple traffic lanes, footpaths and services which all require ongoing maintenance. It is recommended that the basement be set back to ensure that the whole of the land for the proposed Road is vested in Council with no depth limitations.

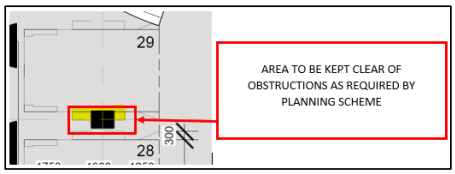
	If the basement was allowed under the Road, I think we would need the following details prior to allowing the Road to be vested in Council: • The exact dimensions of the basement roof, the road construction thickness, the material between them and the proposed vesting boundary; • Construction standards, maintenance and insurance for the basement to ensure it doesn't compromise the Road at any time in the future; • Projections for the use and life of the Road; and Requirements and design of the Road and any other relevant information in consultation with Council's Asset team.
Development Engineer	It is noted the top of the basement carpark will be the road and this causes issues for Responsible Authorities when installing services, e.g. electrical conduits and light poles, stormwater, gas etc. The only option is to have the authorities services within the basement carpark. This is not ideal as it will limit what the authorities can do in terms of maintaining, upgrading or installing additional services. Furthermore, the proposed basement carpark may affect the planting or growth of street trees. With regards to the question about long term heavy vehicle traffic, it is possible to engineer the basement to withstand traffic load. However, having a private basement carpark under a public road will be a high risk to both the pedestrian and road users. Based on this there are two options If the proposed private basement carpark to be under the road: 1. The proposed road needs to be a private road (no thoroughfare). If the road is a public road, the design of the private carpark basement needs signed off by a registered certified engineer and that Council is provided with a copy of the sign off from an engineering Professional and Public Liability Insurance that remains valid for the life of the asset. Other considerations, but not limit to, is how the road and associated assets in the basement should be maintained, provisional area in the carpark for future upgrading and additional services, and also 24/7 access to the basement carpark for maintenance purposes for all the Responsible Authorities.
Traffic/Parking	**Proposal:** • Construction of a multi-level mixed use tower comprising of: - 122 x one-bedroom dwellings. - 111 x two-bedroom dwellings. - 60 x three-bedroom dwellings. - 391m^2 (gross floor area) retail tenancy. - 6,616m^2 (gross floor area) office space. • The proposal includes a two-level basement carpark comprising of 196 parking spaces. • Access is proposed via Ingles Street. • 2 x loading areas are proposed on-site. • 1 x waste loading area is proposed on-site. • 412 bicycle parking spaces are proposed on level 1 for commercial staff and residents. • 38 bicycle parking spaces are proposed on the ground floor external to the building for visitors. **Car Park Layout:** **Access ways:** • Access to the site is proposed via a modified vehicle crossing on Ingles Street. • The width of the access point at the property boundary is dimensioned as 9.403m. This is acceptable. • The circular ramp is dimensioned as 6m wide. The width of the kerb on either side is unknown. The applicant is to show this dimension. • The detailed design of the circulation ramp is not shown on the plans, therefore an assessment cannot be determined if the circular ramp accords with the Australian Standard. • Swept path diagrams have been provided demonstrating a B85 and B99 vehicle simultaneously passing each other on the circulation ramp (although two B99 vehicles was initially requested). Notwithstanding, a review of the swept paths provided raise concern due to the intensity of the development and frequency of traffic. Below marks tight areas were two vehicles encroach into the 300mm clearance area and showing the wheel/body path travelling along the kerb.



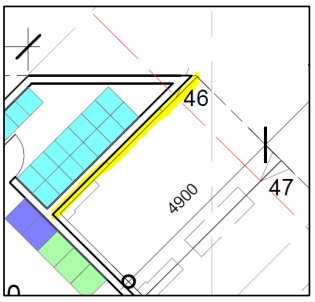
- It is therefore recommended that the circulation ramps be widened to comfortably allow a B99 vehicle and a B85 vehicle to pass each other.
- As per previous comments, we have concerns of the functionality and driver's safety. Depending on the design, the circulation creates a continuous sight line concern. In addition, the entry and exit points at all levels should have corner splays for drivers' sightlines.
- It was previously recommended that all accessways are located on Anderson Street to minimise crossovers on Ingles Street. While we have no objection to the proposed design, we prefer the footpath remains continuous and unobstructed along Ingles Street.
- The TIA states that the requirement for sight triangles is not applicable as there is no footpath on Ingles Street. The architectural plans propose to construct a footpath and therefore this requirement is triggered. This is to be addressed.
- The TIA proposes for a stop/go lighting system be installed along with line marking to manage traffic along the ramp in the basement levels. This is acceptable. Architectural plans are to be updated to reflect the recommendations in the TIA.
- It is noted the security gate to the development is located on the property boundary. This is a poor design outcome as it will result in entering vehicles queueing across the footpath/road. Therefore, it is recommended that the design be amended to allow for vehicles wishing to enter the site to queue within private property.

Car parking spaces:

- Proposed parking spaces are generally 3m wide, 4.9m long and accessed by a 5.2m wide aisle. This accords with the Planning Scheme.
- The TIA notes some column obstructions to parking spaces and parking aisles, however, has not captured all obstructions (example shown below). The design is to be amended to keep all parking spaces and aisles clear from obstructions.



- The TIA notes that a 500mm clearance between tandem bays have not been provided and recommends the plans be updated to show this requirement. This is considered necessary and the recommendation made in the TIA is to be implemented.
- Clearances in accordance with Clause 52.06 have not been strictly applied to parking spaces abutting walls/obstructions. Therefore, recommendations made in the TIA to amend the design in accordance with the Planning Scheme is to be adopted. In cases where full compliance is not achieved, the applicant is to confirm the functionality of the design by providing B85 swept path diagrams to all critical spaces (example shown below).



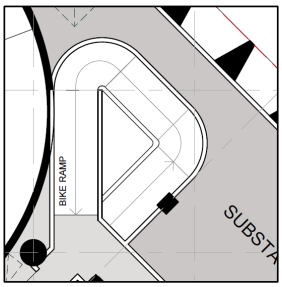
- The applicant is to revise the design of the DDA parking spaces to be fully compliant as noted in the TIA.
- The development is required to provide 9 car share spaces onsite. The applicant is to engage in discussions with CoPP qualified carshare providers to provide required carshare spaces onsite. It is recommended further advice is sought from Strategic Transport.
- The development is required to provide 6 motorbike spaces onsite. The architectural plans show provision of 6 motorbike spaces within the podium car parking level.

Headroom and ramp grades:

- The TIA notes that the minimum headroom clearance within the basement garage meets the requirements of the Planning Scheme. The plans do not detail the available headroom clearance within the parking areas. The applicant is to **ensure** a minimum headroom clearance of 2.1m is available throughout the car park, beneath the carpark doors and within basement ramps, calculated for a vehicle with a wheelbase of 2.8m.
- However, headroom clearance to waste and loading areas is to cater for larger vehicles as discussed in *Loading and Waste Collection*.
- The grades proposed in the architectural plans and the TIA differ from each other. Proposed ramp grades in the TIA have been provided in accordance with the Planning Scheme. However, it appears the length of the circulation ramps exceed 20m, therefore the maximum grade permitted is 1:5. This is to be addressed.
- As some grade changes are less than 3m apart, the applicant is to provide a vertical clearance assessment to confirm the suitability of the design.

Bicycles

- Schedule 1 to Clause 37.04 of the planning scheme requires 322 bicycle parking spaces to be provided for the proposed development, comprising of:
  - 293 resident spaces;
  - 29 visitor spaces.
  - 0 commercial spaces.
- It is proposed to provide a total of 412 bicycle spaces onsite, which exceeds the statutory requirements. The allocation of proposed bicycle facilities is shown below:
  - 293 resident spaces.
  - 29 visitor spaces (resident).
  - 58 commercial spaces.
  - 9 visitor spaces (commercial).
- It is proposed to install 38 bicycle parking spaces external to the site on the ground floor for visitors to the residential component and commercial component. This is acceptable.
- There are concerns regarding the design of the bicycle accessway. The width is unclear and very sharp turns/bends are proposed which results in poor sight lines and may result in falls for inexperienced riders. This is to be addressed.



- A ramp grade of 1:6 is proposed for the bicycle ramp. The Australian Standard states that a gradient of 1:5 will exceed the capability of many riders to remain mounted with stability. A maximum grade of 1:12 is recommended for ease of bicycle accessibility. Given the high provision of bicycle facilities, this is to be addressed to ensure a safe and functional design.
- The development is required to provide 6 showers and 58 lockers for the commercial use. A total of 118 lockers and 10 showers are proposed, which satisfies the recommended provision.
- **All bicycle spaces must be installed in accordance with the Australian standards, ensuring each space has a clear 1.5m access aisle.**
- **Horizontal rail spaces are to be 1.8m long with 1m centres.**
- **Vertical rails are to be installed in a staggered arrangement as per Figure B7 – AS2890.3.**

Loading and Waste Collection

- Two loading areas are proposed on-site. Each loading area has a minimum headroom clearance of 3.5m. This is acceptable subject to this clearance being maintained within the car park to allow larger vehicles to enter / exit the loading bay.
- The loading area allows for a 6.35m low profile rear loader / 5.2m design van to enter / exit each respective parking bay.
- Waste Management plan to be referred to Council's Waste Management department for assessment.

Traffic Generation and Impact:

- The TIA has adopted a traffic generation rate of 0.09 trips per bedroom in the AM peak and 0.07 trips per bedroom in the PM peak. Further, the TIA has adopted a traffic generation rate of 1 trip per space associated to the commercial use.
- Application of these rates to the 293 dwellings and 20 commercial spaces equates to a maximum peak hour traffic generation of 67 trips.
- While the site is located within the local section of Ingles Street, the one-way arrangement avoids traffic conflicts typically experienced in two-way roads.

On Street Parking:

- The existing on-street parking is a mixture of 4-hour and unrestricted parking.
- Residents/visitors of the development will not be eligible for resident parking permits and will need to abide by on-street restrictions.
- Staff/visitors to the commercial use will not be eligible for resident parking permits and will need to abide by on-street restrictions.
- Should parking restrictions be implemented in the future, residents, staff and visitors will not be exempt.

Parking overlay and parking provisions:

- Schedule 1 to the Parking Overlay sets out the maximum requirements for a number of land uses. The maximum car parking provision is shown below:
  - 66 spaces for the office use;
  - 3 spaces for the retail use; and
  - 176 residential spaces.
- It is proposed to provide 196 off-street car parking spaces within the development, comprising of:
  - 17 office spaces;
  - 3 retail spaces; and

	○ 176 residential spaces. • The proposed parking provision is within the maximum permitted. • Noting that the assessment for the appropriate rate for car parking provision lies with Statutory Planning. Reference should be made to CoPP's Sustainable Parking Policy. We also suggest comparing previous approved parking provision rates of adjacent developments as part of the Planning team's assessment / determination. **Other:** • **We agree with the comments from the Subdivision Officer and Development Engineer regarding constructing a new road over the basement car park. These comments need to be considered. It is not fully understood why a road is proposed, as there are no access points along the new road and it does not provide a vital connection between road networks.** • Recommendations in the TIA are to be adopted in conjunction with the above (noting recommendations made by Transport Safety supersede recommendations made in the TIA). • As a new footpath is proposed on Ingles Street, it is recommended a street lighting assessment be conducted. • The plans also show modification to the nature strip and propose indented parking. Further assessment and discussions with Council is required regarding future street scape in this area. • It is recommended that electric vehicle parking spaces be incorporated into the design of the development. • Any redundant crossovers must be reinstated to Council satisfaction. • Any proposed crossovers must be installed to Council satisfaction. The Applicant is responsible for all costs, including those incurred by Council for associated on-street parking signage, line-marking changes and/or infrastructure changes.
Waste Management	I've reviewed the WMP and have following comments; • Number of 1100ltr bins on the plan vary with the number of 1100ltr bins mentioned on the WMP • Councils free Hard/Green waste collection service is for residents only and will only be able to collect if the collection room or loading dock is located at street level, within the property boundary, and which opens onto the street or laneway. The space required for this service must not block footpath/public space access. • How will the hard waste get collected from the ground floor? • Please note how often the green/food waste bin will be emptied from the drop off cupboards (i.e. daily or on a need basis – regular emptying and cleaning of the bins wil be helpful to keep the area clean and safe. • Same as above with the glass bins • Couldn't locate the Charity bin on the plan as specified on the WMP – would be practical to have placed next to the Hard waste storage.
Property	Further to our recent email exchanges regarding this, you may recall that we previously provided a response to the initial query to say that we do not see any concerns from our end (copy attached). We have seen that the revised plans now show that the building height has been lowered to ensure sunlight to the North Port Oval and surrounding new public open space is protected. The amended building will not cause overshadowing (between 11am to 2pm - 21 June to 22 September) noting the building sits well within the shadow line created by a hypothetical building on the western side of Woodruff Street, as per the screenshots below. Given these (sic) information, we reiterate that we do not see any concerns from our end (Council does not have any freehold properties in the vicinity).

	Figure 2 – Shadow Diagrams at their furthest from the subject site, at June 21 and September 22  *Source: Architectural Plans Drawing TP06.01*
Arborist	I have reviewed the report by Future Tree Health dated 27 September 2021. Unfortunately, the report has not addressed my original referral comments sufficiently (see below). I have provided comments in red *(italics added).* I will include these trees in the tree inspections we are carrying out. I will ask my colleagues to take some measurements to advise whether the trees will be compromised by works within the property boundaries only. **07-05-2021:** The plans do not show retention of the street trees surrounding the site and indicate planting of trees within the public realm. The plans should be updated to exclude landscaping beyond the title boundary. *The plans have not been updated to exclude public realm works. The report claims that all trees surrounding the site cannot be retained in order for the project to proceed as planned. As the applicant has not be granted permission to conduct public realm works the Arborist report is not a valid impact assessment.* If the development necessitates the removal of street trees for construction access the applicant will be required to pay Council the amenity value for the trees, plus removal and replacement costs. Planting of replacement trees may only be done by the Responsible Authority. *It has not been demonstrated that tree removal is required to necessitate the construction. In the City of Port Phillip the street trees surrounding a site must be retained and protected unless there are no other viable options. The Arboricultural Impact Assessment report has provided insufficient information to justify why the trees require removal.* *As Council have not approved public realm works by the developer, the trees must be retained and protected throughout all stages of works at the site. There is no Arboricultural reason to remove the trees and they have the capacity to be a great asset to the community for decades to come.* *The plans require amending to omit public realm works, unless otherwise authorised by Council. The Arborist report requires updating to omit any works that have not been authorised by Council. The Arborist report is to follow the direction given in this email.* An Arboricultural Impact Assessment report is required for review to determine whether the longevity and/or stability of the street trees surrounding the sites will be compromised by the development and therefore require removal. If the applicant is seeking removal of street trees they will need to justify their removal. The report must be prepared by a suitably qualified Arborist (AQF level 5 or equivalent) and include all nature strip trees adjacent the property and on neighbouring properties with TPZs that fall within the subject site. The report must follow the guidelines from Council Arboriculture Victoria and comply with the Australian Standard 4970:2009 Protection of Trees on Development Sites. Should the report find that any works encroach into 10% or more of the Tree Protection Zone, or into the Structural Root Zone of any tree, and the design cannot be modified to reduce the incursion, then a hydro non-destructive root investigation (NDRI) must be conducted and documented (with a root map) the location, depth and diameter of all roots found along the line of the proposed works. The findings, photographs and recommendations should be presented in the impact assessment report. Following council arborist approval of the Arboricultural Impact Assessment, a Tree Protection and Management Plan that details how the trees will be protected, in accordance with AS4970-2009 (Protection of Trees on Development Sites), will be required for endorsement and form part of the permit.