

26 September 2023

Mr Nick Prell
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Dear Nick

**RE: PEER REVIEW OF REVIEW OF ENVIRONMENTAL FACTORS FOR THE CHARING CROSS
STREETSCAPE UPGRADE
CHARING CROSS, WAVERLEY**

Milestone (AUST) Pty Limited (Milestone) has been engaged by Waverley Council (Council) to undertake a Peer Review of the draft Review of Environmental Factors (REF) Report prepared by Environmental Partnerships (NSW) Pty Ltd (Environmental Partnerships) dated 12 September 2023, relating to the Charing Cross Streetscape Upgrade that will be carried out by Council pursuant to Part 5 of the Environmental Planning and Assessment Act 1979 (EP&A Act). We provide recommendations as part of this Peer Review, which include revision to the draft REF Report and supporting documentation, as well as the provision of additional information and further analysis in relation to the proposed activity.

We provide the following documents for your consideration:

- This Cover Letter prepared by Milestone dated 26 September 2023.
- Recommendations Table for revision of the draft REF, prepared by Milestone dated September 2023 (**Appendix A**).
- Mark-up of the draft REF Report prepared by Milestone (**Appendix B**).

This Peer Review is based on Milestone's review of the following:

- Review of Environmental Factors prepared by Environmental Partnerships, dated 12 September 2023, including:
 - Appendix A: Clause 171 Factors and Ecologically Sustainable Development Considerations under the Environmental Planning & Assessment Regulations 2021 prepared by Environmental Partnerships (No Date).
 - Appendix B: State Environmental Planning Policy (Transport and Infrastructure) 2021 Consultation Requirements, prepared by Environmental Partnerships (No Date).
 - Appendix C: Statement of Heritage Impact prepared by Artefact Heritage, dated 4 September 2023.
 - Appendix D: Preliminary Civil and Traffic Engineering Assessment Report prepared by TTW (NSW) Pty Ltd (TTW), dated 13 September 2023.
 - Appendix E: Magnolia grandiflora - 280 Bronte Rd Charing Cross prepared by Waverley Council's Arborist Team (No Date).
 - Appendix F: Concept Design Plans prepared by Environmental Partnerships, dated 12 September 2023.

1.0 SUMMARY OF RECOMMENDATIONS

The table at Appendix A lists proposed recommendations for the revision to the draft REF Report, with reference to the relevant section and associated page number within the draft REF document. These recommendations are provided to facilitate a final draft REF report, which meets legislative

requirements to enable its public notification. Refer to the Recommendations Table prepared by Milestone, held at **Appendix A**.

1.1 General Comments

General revisions to the REF Report are recommended as outlined in the mark-up held at **Appendix B**. A summary of the key revisions recommended by Milestone include:

- Review all section headings of the REF document so that they are correctly identified and numbered. For example, *Section 1.0: Introduction* is missing the numerical '1.0' within the title.
- Consistently reference the project name throughout the REF Report (and supporting documentation). For example:
 - The title of this Project is the '*Charing Cross Streetscape Upgrade*'. Each word is to be capitalised.
 - When referring to the '*Charing Cross Village Centre*', each word is to be capitalised.
- Add full stops to the end of every paragraph and bullet point throughout the REF Report.
- Reference all direct quotes from supporting documents or planning legislation in *italics*.
- Link all figures and photo references to the body of text. For example, the image on Page 53 has no title or Figure number, nor is it referenced within the relevant body of text.
- Review sequencing of tables within the REF so that numbering is consistent. For example, Table 10 (Page 57) follows Table 8 (Page 46), and Table 9 is omitted.

Requirements for the Final REF Report

- The logo and signature of the Determining Authority (Waverley Council) will need to be included on the Cover Page of the final REF Document.
- A statement from the report author (Environmental Partnerships) certifying that the REF Report has been reviewed and the report contents are endorsed by the Consultant. This statement should appear upfront in the REF Report.

2.0 SUPPORTING DOCUMENTS

Milestone has undertaken a review of the supporting documentation appended to the draft REF Report. In particular, it is critical that all conclusions and mitigation measures recommended by each expert consultant for the Charing Cross Streetscape Upgrade are considered within the final REF Report.

In addition, general comments in relation to supporting documentation are provided within **Table 1**.

Table 1: Supporting Document Comments

REF Appendix	Title of Supporting Document	Milestone Recommendation
A	Clause 171: Factors and Ecologically Sustainable Development Considerations under the EP&A Regulations 2021 Prepared by Environmental Partnerships (No Date).	<p>Clause 170 of the Environmental Planning and Assessment Regulation (EP&A Regulation) states that the Planning Secretary may issue guidelines in relation to factors to be taken into account by a Determining Authority (Waverley Council) when considering the likely impact of an activity and the form of document required to be prepared (REF Report).</p> <p>The guideline currently in force is the <i>Guidelines for Division 5.1 Assessments</i> (June 2022).</p> <p>Clause 171(2) of the EP&A Regulation states:</p> <p><i>"(2) If there are no environmental factors guidelines in force, the determining authority must take into account the following environmental factors—"(a-r).</i></p> <p>On this basis, the assessment provided under Clause 171 of the EP&A Regulation held at Appendix A of the REF Report is not required. We recommend that Environmental Partnerships (refer to Section 1.1), insert the following wording:</p> <p><i>"I certify that I have reviewed and endorsed the contents of this REF document and, to the best of my knowledge, it is in accordance with the EP&A Act, the EP&A Regulation and the</i></p>

		<p><i>Guidelines approved under clause 170 of the EP&A Regulation, and the information it contains is neither false nor misleading”.</i></p> <p>This statement acknowledges that the considerations under the guidelines have been considered, as required by the guidelines.</p>
B	<p>Transport and Infrastructure SEPP Consultation Requirements Prepared by Environmental Partnerships (No Date).</p>	<p>Refer to Milestone’s comments provided within the Mark-up held at Appendix B of this Peer Review.</p>
C	<p>Statement of Heritage Impact (Revision 4) Prepared by Artefact Heritage dated 4 September 2023</p>	<p>Milestone’s general comments in relation to the Statement of Heritage Impact (SoHI) are:</p> <p>1. Concept Plans Section 1.3 of the SoHI needs to clearly reference the Concept Plans reviewed by Artefact Heritage for their assessment of the Charing Cross Streetscape Upgrade. It is also important to note that the Concept Plans prepared by Environmental Partnerships are at the 50% Detailed Design stage. We recommend that the Concept Plans are appended to the final SoHI.</p> <p>2. LEP Mapping It is recommended that the LEP 2012 Heritage Map be included within Section 2.2.1 of the SoHI.</p> <p>3. Figure and Photo Referencing All figures and photos within the SoHI need to be referred to and linked to the body of text throughout the report. For example, Figures 16 to 23 (Page 32-33) are not currently linked to the body of text.</p> <p>4. Grammar Milestone has noted a number of grammatical errors within the SoHI. It is recommended that Artefact Heritage undertake a final comprehensive review to pick up any grammar errors throughout the final report.</p>
D	<p>Preliminary Civil and Traffic Engineering Assessment Report Prepared by TTW dated 9 September 2023</p>	<p>Milestone’s general comments in relation to the Preliminary Civil and Traffic Engineering Assessment Report are:</p> <p>1. Reference to Previous Traffic Study The Preliminary Civil and Traffic Engineering Assessment Report prepared by TTW makes reference to the previous Traffic Study prepared by GHD dated 19 November 2020 (refer to Section 2 – Page 4). Milestone recommends that the previous Traffic Report is appended to the new report prepared by TTW, as it relies on this previous study.</p> <p>2. Figure and Photo Referencing Ensure that all figures and photos are correctly referenced within the body of text. For example, Figure 3: Swept Path Analysis – Articulated Bus is referred to as Figure 5, within Section 2.5 (Page 6).</p> <p>Ensure that all figures have an associated reference number and title. For example, the Figure on Page 8 has no reference number or title.</p> <p>3. Grammar Milestone has noted a number of grammatical errors within the Preliminary Civil and Traffic Engineering Report. It is recommended that TTW undertake a final comprehensive review to pick up any grammar errors throughout the final report.</p>

E	Magnolia grandiflora - 280 Bronte Rd Charing Cross Prepared by Waverley Council's Arborist Team (No Date).	Milestone's general comments in relation to the Arborist Statement are as follows: 1. Letterhead Milestone recommends that the Arborist Statement be provided on Council's letterhead. 2. Comment on Tree Removal Comment should be provided by the Arborist in relation to the two trees proposed for removal with reference to Council's Biodiversity Maps indicating that the Charing Cross Village Centre is of low retention value to support their removal.
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3.0 SUMMARY

Milestone has undertaken a comprehensive Peer Review of the draft Review of Environmental Factors prepared by Environmental Partnerships, dated 12 September 2023, for the Charing Cross Streetscape Upgrade.

The recommendations provided by Milestone relate to revision of the draft Review of Environmental Factors Report and supporting documentation, as well as the provision of additional information and further analysis in relation to the proposed activity to facilitate a final draft Review of Environmental Factors, which meets the legislative requirements to enable its public notification.

Milestone is happy to undertake a further final review of the final draft Review of Environmental Factors, should this be helpful.

If you require clarification on any matter, do not hesitate to contact Luke Signoretti, Associate, or Lisa Bella Esposito, Director.

Yours sincerely

Milestone (AUST) Pty Limited



Luke Signoretti
Associate



Lisa Bella Esposito
Director