

URBANE STUDIO

REF: 22-193

C/Googong Projects(NSW) Pty Ltd

Ruth Ormella
Director | Development and Environment
256 Crawford St,
QUEANBEYAN NSW 2620

Dear Ms Ormella,

RE: Development Application No. DA.2023.0103

For land/premises at LOT 566 DP 1263952, 43 MCFARLANE AVENUE GOOGONG NSW 2620

I refer to the Council letter dated 18th August 2023, requesting further information regarding the subject development proposal. The following comments are provided:

1. Description of Development

"In buildings 1-6, the development proposes attached dwellings, each with access at ground level, conforming to the description of multi dwelling housing.

This issue has been previously raised on a number of occasions including as part of the Development Coordination and Review Panel (DCR) Meeting dated 28/04/2022, the Southern Regional Planning Panel meeting dated 06/06/2023, during our site visit dated 26/07/2023 and in subsequent correspondence.

It is noted that you are seeking legal advice on this matter however to date, an adequate response has not been provided to this request. It is therefore requested that the description is amended to include proposed multi-dwelling housing. In addition, all supporting documentation is to be amended to reference the correct uses including (but not limited to): Architectural Plans, Civil Engineering Plans, Statement of Environmental Effects incorporating amended Development Control Plan Compliance tables, Landscaping Plans and SEPP 65 Assessment."

Response:

Please see **ATTACHMENT A** for legal advice from Maddison Marcus lawyers.

2. Delivery of affordable/social housing

“Reference is made to affordable housing with the Statement of Environmental Effects (SEE). Please confirm the number of affordable housing units proposed as part of the development and if a registered social landlord (RSL) has been nominated for these units.”

Response:

No affordable housing has been included in this development proposal. The reference to affordability was solely intended to indicate the pricing range of the units, considering their different sizes and types. Section 1 of the Statement of Environmental Effects (SEE) has been revised to remove any mention of affordable housing.

3. Waste collection arrangements

“Please provide a detailed description as to how waste management will operate in the development including bin storage locations, travel routes, number of bins and bin pickup locations.”

Response:

Please refer to **ATTACHMENT B** for a comprehensive Construction and Operational Waste Management Plan.

4. Tree removal

“Please provide details including photos of the trees to be removed and the location of compensatory tree planting.”

Response:

The current street trees have recently been planted, and consequently, they are relatively small in size. The picture on the next page, taken from McFarlane Avenue, illustrates two trees marked for removal, providing a perspective on their size and proportion. The reason for removing these trees is to make way for the construction of a driveway.

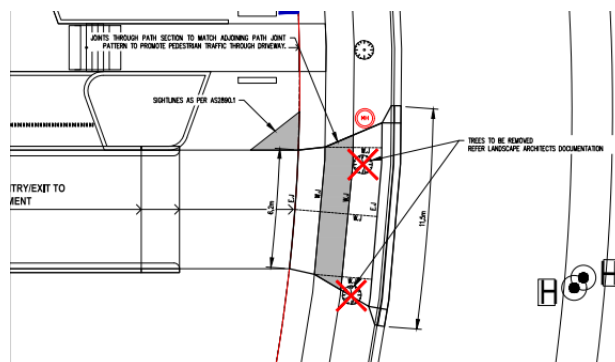


Table 1/Location of proposed trees to be removed.

It's important to note that street trees are consistently spaced approximately 5.5-6 meters apart along all sides of the property, leaving no room for additional planting on the verge.

However, the proposed development aims to incorporate approximately 165 trees within private courtyards and the central open space. Given this substantial tree planting within the property and density of trees on the verge, the removal of the two smaller street trees will be offset by the considerable tree planting efforts within the development itself.



Figure 1| Proposed Street trees to be removed.

5. ADG design verification statement

"I am unable to locate an assessment of the development against the SEPP 65 principles. Please provide this assessment. "

Response:

Please see **ATTACHMENT C** for updated design verification statement by DNA Architect.

6. Engineering

“A Traffic Impact Assessment report completed by Calibre assumed only 142 Multi-unit dwelling for stage 5B. There are two super lots in 5B, and the proposed development application proposes constructing 138 units, which is approximately 50% more than the original residential yield. As such, Traffic and Parking Impact Study must be provided incorporating the traffic modelling and performance of surrounding intersections and roads from the proposed development.

The traffic impact assessment should consider all turning movements, including waste collection vehicles. Waste collection is to occur within the property boundary, with service vehicles entering and leaving the site in a forward direction.

A stormwater management plan to be submitted complying with QPRC’s D5 – Drainage Design Specification.”

Response:

Please refer to **ATTACHMENT D** for the **Traffic Impact Assessment**. The traffic modeling confirms that the addition of 72 dwellings, beyond the assumed development scale, does not result in any significant differences. The Level of Service (LOS) remains consistent for all intersections, with a variation in delay of only two seconds. Therefore, there is no need to propose any changes to the infrastructure.

It's important to note that the provisions of QPRC – D5- Drainage Design Specification do not apply to this site. This is because no on-site stormwater modeling was factored in during the subdivision Development Application (DA) for Neighborhood 2. This practice aligns with all multi-unit development sites across Googong

7. Essential Energy Referral Response

“Please respond to the issues raised by Essential Energy in their referral response (attached).”

Response:

Please refer to **ATTACHMENT E**, which contains the updated **External Services Plan** including dimensions from the essential energy assets. This revised plan includes dimensions that clearly depict the clearance distance from the substation and under ground power line.

8. NSW Police Referral Response

“Please response to the issues raised by NSW Police in their referral response (attached).”

Response:

NSW Police has provided recommendations regarding Lighting, CCTV cameras, Lines of sight and communal areas. Please see below responses to each item. This response should be read in conjunction with the Lighting Plan and CPTED Report provided in **ATTACHMENT F** and **G** of this letter. We note that all recommendations from the CPTED report and lighting plan can be effectively implemented during the detailed design phase. We kindly request that these recommendations be included as conditions of the development consent should the council have any concerns.

Lighting: Sufficient Lighting should be placed in the communal area and the 7 entry/exit points to the communal area as well. A basic level of lighting should allow the identification of a face from a distance from 10 metres.

In regard to the Communal area, if the developer wishes this to be used for nighttime use then consideration should be given to the design, type and placement and also the intensity of lighting. If the developer wishes the area not to be used at night further consideration should be given to the type and intensity of lighting.

Lighting should be vandal proof and lights should be maintained and bushes, tress that block off light should be trimmed.

Response:

A lighting consultant has been engaged which prepared a concept lighting design for the site that has been provided in **ATTACHMENT F** to this submission. We note that the final lighting design will be conducted as part of the detail design phase.

***CCTV Cameras:** Consideration should be given to installing CCTV Cameras in the underground carpark. Underground/basement carparks are often a “hotspot’s” for would be offenders to steal vehicles, items from vehicles and items from storage cages. Generally, basement carparks are well lit making the use if CCTV Cameras effective. CCTV cameras also have proven effective in deterring and identifying would be offenders.*

Response:

Access to the basement is only available to the residents through the automatic roller door from the basement entry or through each building's lift. Access to lifts is restricted to the residents and requires a key for added

safety. If the council deems it necessary to install CCTV cameras in the basement, this can be included as a condition during the detailed design stage.

***Lines of Sight:** Lines of sight should be maintained throughout the development. From looking at the Landscape drawings there a large number of trees and shrubs. These should be well maintained and do not obstruct the line of sight to the communal area and around the building.*

Response:

The number and size of trees in the communal open space and the deep spoil zone area are determined by the requirements of the Apartment Design Guidelines. However, the selection of tree species is a result of meticulous evaluation, keeping a balance among various considerations such as climate adaptability, solar access, inflammability, soil type, and drainage.

Furthermore, the choice of tree species has been made with great care, prioritizing tall trunks and elevated canopies to prevent a bush-like appearance and any potential obstruction of sightlines. In a similar vein, the use of shrubs in the communal open space has been judiciously limited. The predominant species chosen consist of ground covers and small shrubs. Even when fully grown, these plants will not provide concealment opportunities or impede sightlines.

It is noted that the proposal includes only two large shrubs, which have the potential to grow to more than 1 meter in height. These shrubs are identified as BXj (Japanese box) and VBo (viburnum). However, it's important to clarify that BXj can be pruned to a height of 1 meter or less, and VBO is strategically placed where we require a tall screening shrub against walls or fences. Consequently, neither of these shrubs will create any obstruction to sightlines concern.

It's worth highlighting that while the landscape plan may appear densely populated, all depicted trees and plants are shown at their mature size. Within urban environments, plants typically achieve only 70% of their size compared to their natural habitat.

Additionally, the proponents are committed to diligent maintenance overseen by the building manager and the body corporate, ensuring the landscape remains well-kept and minimizes any potential Crime Prevention Through Environmental Design (CPTED) concerns, including appropriate pruning of trees and shrubs as common practice.

***Communal Area:** Seating and BBQ structures should be vandal proof in the BBQ area and bins should be cleaned regularly. Areas that are well maintained create a sense of pride*

residents in the unit complex will ensure that the area is maintained and keep clean and tidy. This will prevent the area being damaged as it an area appears that it is not cared for them the area can sometimes.

Response:

All BBQ areas, seating, and any communal facilities will be meticulously selected to ensure they are vandal-proof and robust. The communal open space will be maintained in a clean and orderly manner through mechanisms overseen by the body corporate and building manager.

9. Impact of vehicular access/egress to the basement on amenity of residential units

“The east facing units in Building 4 are likely to be impacted upon by vehicles entering and exiting the basement car park in respect of light and noise pollution. Please detail the mitigation measures proposed to ensure the relevant unit are not unacceptably impacted.”

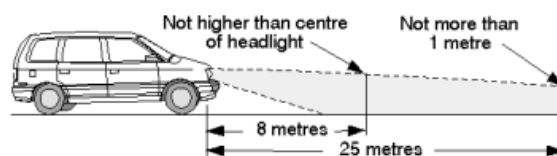
Response:

Please see the section below, which has been produced for the basement ramp and units above, considering the light beams from a car entering the basement. This analysis is based on the Australian Light Vehicle Standards Rules 2015.

As illustrated in the section, the extended planter box placed on the edge of the ground floor will effectively block most of the light spill from cars entering the basement. Only a small portion of light, at approximately 2 meters above the ground, will bypass the planter box and hit a blank wall of unit 4.16 at ground level. It's important to note that unit 4.16 faces the laneway to the south and has no opening facing McFarlen Avenue, therefore the light impact will be zero.

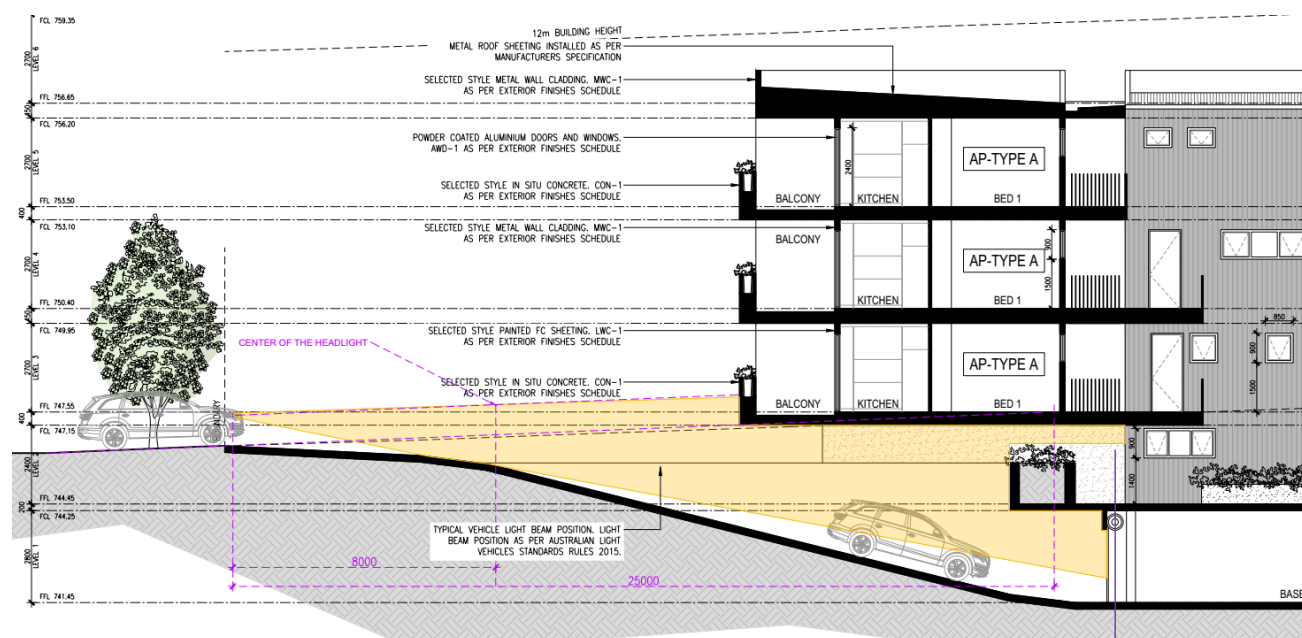
low-beam, for a headlight or front fog light fitted to a vehicle, means that the light is built or adjusted so, when the vehicle is standing on level ground, the top of the main beam of light projected is:

- (a) not higher than the centre of the headlight or fog light, when measured 8 metres in front of the vehicle; and
- (b) not over 1 metre higher than the level where the motor vehicle is standing, when measured 25 metres in front of the vehicle.



A headlight in the low-beam position

For units located on top of the basement ramp, there would be no light pollution. It's worth noting that these balconies open into the kitchen and living room areas of these units, and there would be no detrimental impact of noise pollution for the bedrooms of these units as they are located at the rear. Should Council feel necessary, use of double glazing for these balconies can form part of conditions of consent.



The light may penetrate over the planter box but will hit a blank wall of unit 4.16 at ground level.

10. Safety/Security

Please provide a Crime Prevention Through Environmental Design (CPTED) report prepared by a suitable qualified consultant.

Response:

Please refer to **ATTACHMENT G** for the **CPTED Report**.

We have taken note of the recommendations in the CPTED report, particularly regarding controlled access to site entries and the potential concealment issues associated with storage cages in the basement. In response, we would like to highlight the following:

1. We plan to install gates at all seven pedestrian entries, which will be operated using key fob and intercom systems for visitor access.

- We are open to reconfiguring the parking allocations (moving visitor parking spaces closer to the lift cores), including the removal of storage cages from visitor parking areas, to completely eliminate concealment potential in the basement.

Given the minor nature of these proposed changes and their feasibility during the detailed design phase, we kindly request that the CPTED report recommendations be included as conditions of the development consent.

Conclusion

We trust this information is sufficient to enable the assessment of the proposal. Should you require any further information please do not hesitate to contact us.

Yours sincerely,



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