

2 October 2024

TfNSW Reference: SYD24/1593/01

DPHI Reference: PP-2022-2519

Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

RE: PLANNING PROPOSAL – PYMBLE GOLF COURSE, 4, 12 & 14 COWAN ROAD, ST IVES

Attention: Ms Shruthi Sriram

Dear Ms Fishburn

Transport for NSW (TfNSW) appreciates the opportunity to provide comment on the above Planning Proposal as referred to us via the NSW Planning Portal on 13 September 2024. We note consultation is being undertaken with TfNSW under Condition 3 of the Gateway Determination dated 12 July 2024.

TfNSW notes that the Planning Proposal seeks to:

- Amend *Ku-ring-gai Local Environmental Plan 2015* (KLEP) to facilitate rezoning and amendment of planning controls at 4, 12 & 14 Cowan Road, St Ives (Pymble Golf Club).
- To heritage list the single dwellings at 12 & 14 Cowan Road.

TfNSW notes that the proposed amendments to KLEP 2015 would also be supported by a draft site specific DCP to ensure the new built form reflects the established and desired future character of the St Ives centre, consistent with the form envisaged by the proponent.

TfNSW has reviewed the submitted documentation and provides comments in **Attachment A** for DPHI's consideration. Please note that the comments provided are of a preliminary nature. They are not to be interpreted as binding upon TfNSW and may change following review of development application/s in the future, should the Planning Proposal be finalised.

Thank you for the opportunity to provide advice on the subject planning proposal. Should you have any questions or further enquiries in relation to this matter, please contact Ashish Tamhane via email: development.sydney@transport.nsw.gov.au

Yours sincerely,



Dipen Nathwani
**A /Senior Manager Strategic Land Use (Eastern)
Planning & Programs, Greater Sydney Division**

Attachment A –Comments on Planning Proposal PP-2022-2519

Transport Impact Assessment (prepared by Ason Group, dated 2 June 2022)

- As indicated in the Transport Impact Assessment (TIA) report, traffic surveys were undertaken in 2017. It is considered that the survey data is out of date now and new traffic surveys should be undertaken with current counts to accurately inform the traffic impacts. SCATs data for Wednesday August 2024 seems to show that there are roughly 300 more vehicles using Mona Vale Road northbound and around 250 vehicles more in Saturday midday peak which supports the view that new traffic counts should be undertaken to ensure that accurate volumes are adopted in assessing the impact of the Planning Proposal on the road network. In addition, page 14 of TIA report indicates the time of the AM peak, and Saturday midday peak however does not provide a time of the weekday PM peak.
- It is noted that the vehicular access to and from the site is proposed to be restricted to left in and left out movements only due to the queuing experienced on Cowan Road. It is expected that the majority of vehicles exiting the golf club would therefore perform what is a U-turn movement at the roundabout of Cowan Road / Village Green Parade to head towards the intersection of Mona Vale Road / Cowan Road. However, SIDRA traffic modelling results summary provided appears to indicate that the 2027 future + development traffic conditions is an improvement over the baseline 2027 traffic conditions at the intersection of Mona Vale Road / Cowan Road despite the site increasing trip generation by approx. 50 vehicles per hour in the peak periods. This is also supposedly an improvement over existing traffic condition.

It is unclear how the 2027 (Future + Dev) traffic modelling results indicate that traffic conditions either remain relatively the same or improve in comparison to the 2017 and 2027 (future) modelling even though the site will generate additional vehicle trips in peak periods in addition to general population/traffic growth in the future years.

- The TCS cycle time of 156sec seems to have been adopted in the future year SIDRA model at the intersection of Mona Vale Road / Cowan Road. The maximum cycle time for this interaction is 140sec. It is unclear why such a high cycle time is adopted.
- Optimum Cycle time option seems to have been adopted in the existing and future year SIDRA model at the intersection of Mona Vale Road / Cowan Road and in the future year at the intersection of Killeaton Street / Cowan Road. Consideration should be given to adopt cycle time option based on the SCATS data for the existing scenario and preferably practical cycle time for the future year scenario.

General Comments

- The indicative yield adopted in TIA report is 80-100 residential units. However, the Urban Design report seems to indicate estimated yield of 77 residential units. Further assessment of accurate estimated yield will be required as part of the future master planning/ Development Application stage for the site.
- Cowan Road at the intersection with Mona Vale Road experiences significant queuing during the peak periods that can extend beyond the site due to Mona Vale Road being given priority at the signals. There is a concern that the additional traffic generation will exaggerate traffic conditions at the Mona Vale Road and Cowan Road intersection.
- It is suggested that further detailed assessment be conducted as part of the future master planning / Development Application stage for the site to assess access arrangements to and from the site.

20 February 2025

TfNSW Reference: SYD24/1593/02

DPHI Reference: PP-2022-2519

Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

RE: PROPONENT'S RESPONSE TO TFNSW COMMENTS – PYMBLE GOLF COURSE, 4, 12 & 14 COWAN ROAD, ST IVES

Attention: Ms Shruthi Sriram

Dear Ms Fishburn

Transport for NSW (TfNSW) appreciates the opportunity to provide comment on the proponent's response to the TfNSW submission (2 October 2024) for the above Planning Proposal, as referred to us by email dated 21 January 2025.

TfNSW has reviewed the proponent's response to our comments and the Transport Assessment Addendum Memorandum and provides comments in **Attachment A** for DPHI's consideration.

Please note that the comments are of a preliminary nature. They are not to be interpreted as binding upon TfNSW and may change following review of development application/s in the future, should the Planning Proposal be finalised.

Thank you for the opportunity to provide further advice on the subject Planning Proposal. Should you have any questions or further enquiries in relation to this matter, please contact Ashish Tamhane via email: development.sydney@transport.nsw.gov.au

Yours sincerely,

A handwritten signature in black ink, appearing to read "Carina Gregory".

Carina Gregory
Senior Manager Strategic Land Use (Eastern)
Transport Planning
Planning Integration and Passenger

Attachment A –Comments on Planning Proposal PP-2022-2519

1. Response to Submissions (Prepared by DMPS dated December 2024)

TfNSW notes the responses by the proponent to TfNSW comments in the response to submissions.

2. Transport Impact Assessment Addendum Technical Memorandum (prepared by Ason Group, dated 21 November 2024)

- TfNSW still have concerns with the increase in yield in an environment which is already congested. The area is already experiencing high levels of congestion, adding more housing (especially high-density residential) could exacerbate traffic problems, placing more strain on existing infrastructure. Intersection of Cowan Road / Mona Vale Road experiences regular queueing beyond the access to the subject development. The report indicates queueing of over 200m on Cowan Road in the PM and weekend peaks with the development.

Whilst a proposed left in left Out (LILO) arrangement is not opposed, LILO treatment is unlikely to help in mitigating traffic impacts of the development.

- The proposal considers a yield of 78 dwellings however with the proposed zoning changes there is potential for a higher yield which will likely impact further on the congestion placing more strain on existing infrastructure. The traffic report indicates that this number is not exact and can be altered in future applications. Any works to improve the congestion in the area would likely require significant investment in infrastructure upgrades and these costs could outweigh the benefits of such developments.
- The Transport Impact Assessment report states:

'It is important to note that the above development yield has been adopted for the purposes of traffic modelling in this TIA. Gateway determination or subsequent Planning Proposal approval does not in and of itself provide approval for any specific development mix or lock a future developer into a particular development outcome. Ultimately, any development proposal will need to be further considered with regard to specific uses and final yields as part of subsequent Master Planning and/or Development Applications following the rezoning of the Site to which this Planning Proposal relates.'

As outlined above, the area already faces significant traffic congestion, and any potential infrastructure improvements would incur substantial costs. Introducing additional yield, regardless of the extent, would further exacerbate this issue. Therefore consideration should be given for any changes to zoning be of a minor scale and avoid increases to small pockets of land to high-density residential development.

The Transport Impact Assessment report states (Page 20) *Note: 1) Upgrade to signals in future in accordance with Ku-ring-gai Contribution Plan 2010*". SIDRA model seems to indicate that the intersection currently operating at Level of Service (LoS) "F". Is there a timing or trigger for these works to be undertaken under the Ku-ring-gai Contribution Plan 2010. TfNSW is not aware if Council has any plans to upgrade the intersection as yet. As such, the Killeaton Street / Cowan Road intersection upgrade to traffic signals in year 2027 may be unrealistic and need further clarification. Alternatively, consideration should be given to model the intersection as unsignalised as it is today.

- It is suggested that further detailed assessment should be conducted as part of the future master planning / Development Application stage for the site to assess access arrangements, subject to the Planning Proposal being finalised by the approving authority.

TfNSW notes that the site-specific Development Control Plan to be prepared by Council in conjunction with the Planning Proposal will include controls for site ingress and egress to be left-in/left-out as per the Transport Impact Assessment, and further that future development will provide separate access points for the Pymble Golf Club and residential development from Cowan Road.



Your ref: PP-2022-2519 (Referral Ref 3143)
Our ref: DOC24/761626

Ms Shruthi Sriram
Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Subject: Biodiversity Conservation and Science Group Comments - Pymble Golf Course - Planning Proposal PP-2022-2519

Dear Ms Sriram,

Thank you for your referral received 16 September 2024 requesting comments from the Biodiversity, Conservation and Science (BCS) Group of the NSW Department of Climate Change, Energy, Environment and Water (DCCEEW) on the planning proposal for Pymble Golf Club at 4, 12 and 14 Cowan Road, St Ives (PP-2022-2519).

It is understood the Planning Proposal seeks to amend the *Ku-ring-gai Local Environmental Plan 2015* to rezone the land, and to increase the maximum building height and floor space ratio controls, and to relocate and heritage list the existing timber cottages at 12 and 14 Cowan Road (cottage buildings, footprint and curtilage) within Schedule 5 of KLEP 2015.

BCS provides flood and biodiversity comments at **Attachment A**.

If you have any further questions about this issue, please contact Liz Peterson, Senior Conservation Planning Officer at elizabeth.peterson@environment.nsw.gov.au.

Yours sincerely

31/10/2024

Susan Harrison,
Senior Team Leader, Planning
Greater Sydney Branch
Regional Delivery
Biodiversity, Conservation and Science Group

Attachment A - BCS comments on the Pymble Golf Course - Planning Proposal PP-2022-2519

BCS has reviewed the following documents:

- *Planning Proposal – Pymble Golf Course – Residential Flat Building* (dmps, July 2022),
- *Draft DCP Part 140 – Pymble Golf Club*,
- *Ecological Constraints Assessment* (Narla, June 2022)
- *Gateway determination report – PP - 2022-251 dated July 2024 (Gateway Report)*
- *Urban Design Report* (Mayoh Architects, March 2023).

Flooding

Table 8 of the Planning Proposal (PP) addresses Section 9.1 Ministerial Directions. In addressing Direction 4.1 Flooding, the report claims that the proposal is consistent with the Direction despite there being no flood information for the site. The report states:

'Detailed mainstream and overland flow flood mapping has not been completed by Council for this area. As the site is situated near the ridgeline mainstream flow flooding is not a concern. The site-specific Development Control Plan to be prepared Council requires that in selection of an appropriate means of stormwater disposal, particular regard must be given to downstream impacts, including potential flooding impacts.'

BCS highlights that, consistency with Direction 4.1 Flooding should be based on evidence-based flood information. Therefore, there is a need for a preliminary flood assessment to identify whether the site is impacted by mainstream flooding or overland flow for the full range of flooding.

The outcomes of the preliminary assessment would guide decisions on the consistency of the PP with the Direction 4.1. It would also inform the preparation of the site-specific development control plan regarding the requirements for flood related controls.

Biodiversity

The Ecological Constraints Analysis (ECA) and PP have identified that the subject land contains Blue Gum High Forest (BGHF) and Sydney Turpentine Ironbark Forest (STIF), both critically endangered ecological communities (CEECs) listed under the *Biodiversity Conservation Act 2016* (BC Act). Under the BC Act 'critically endangered' means the ecological community is facing an extremely high risk of extinction in Australia in the immediate future. Both BGHF and STIF can occur as single trees.

Biodiversity Offsets Scheme

The ECA correctly identifies that future development applications on the site will likely result in development that exceeds the Biodiversity Offset Scheme (BOS) threshold under the BC Act. It should also be noted that if any future development on the site is State significant development, under section 7.9 of the BC Act, it will require a Biodiversity Development Assessment Report unless the Planning Agency Head and the Environment Agency Head determine that the development is not likely to have any significant impact on biodiversity.

For both State significant development and local development, this will require SAI to be assessed.

Serious and Irreversible Impacts

BGHF and STIF are threatened entities that are likely to be at risk of a serious and irreversible impact (SAII) (*Biodiversity Conservation Regulation 2017*, clause 6.7), which must be addressed in accordance with section 9.1 of the Biodiversity Assessment Method 2020. The ECA does not include an assessment that would allow the approval authority to determine whether removing any BGHF or STIF on this site for future development will constitute a SAI. If the planning proposal is made without sufficient consideration of SAI it could mean that future development is unable to be approved in line with the requirements under section 7.16 of the BC Act.

Fauna Surveys

Further surveys or justification as to why further surveys aren't required will need to be undertaken prior to or at the development application stage for the threatened fauna deemed as having potential to occur in the Survey Area (Section 3.3, Table 4 of the ECA).

Urban Design

BCS supports the urban design outcome (Urban Design Report) of 'a development which will not have adverse impacts on the local biodiversity, ecology...' and specifically supports an urban design outcome that avoids impacts (both direct and indirect) to mapped BGHF and STIF threatened ecological communities (TECs).

Development Controls

Given the isolation of the patches of STIF and BGHF, BCS recommends the following additional measures be added to the DCP development controls, to ensure the survival of remnant TECs from both direct and indirect impacts during the construction and operational phase:

- Objectives and controls that ensure long term improvement and protection of the STIF and ensure retention of the existing significant trees identified as part of the STIF within and adjacent to the site. Noting that the DCP objectives and controls currently only relate to BGHF.
- Biodiversity values that are retained must be protected during construction and operation of the development.
- Prior to any works commencing on site, a vegetation management plan for the rehabilitation and management of existing native vegetation must be prepared by a suitably qualified ecologist.
- Development is to maintain existing soil profiles and not regrade soils and levels of soils surrounding retained vegetation and buffers to ensure the health of retained vegetation.
- Site landscaping use a mix of local native provenance plant species from the relevant native vegetation community that once occurred in this locality to improve local biodiversity as part of site landscaping.

End of Submission



Your ref: PP-2022-2519 (Referral Ref 3143)
Our ref: DOC24/761626

Ms Shruthi Sriram
Planning Officer
Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Subject: CPHR comments - Pymble Golf Course - Planning Proposal PP-2022-2519

Dear Ms Sriram,

Thank you for your referral received 10 January 2025 requesting comments from the Biodiversity, Conservation and Science (BCS) Group of the NSW Department of Climate Change, Energy, Environment and Water (DCCEEW) on the Proponent's response to advice on the planning proposal for Pymble Golf Club at 4, 12 and 14 Cowan Road, St Ives (PP-2022-2519).

From the 20 January 2025 BCS has become the Conservation Programs, Heritage and Regulation (CPHR) Group.

CPHR has reviewed the *Response to Submissions* (dmps, December 2024) against advice provided (Ref: DOC24/761626) and provides biodiversity advice at **Attachment A**. In relation to flooding, all CPHR's previous comments have been addressed. The dmps report indicates that the development is not impacted by Cowan Creek mainstream flooding and is unlikely to be impacted by overland flooding.

If you have any further questions about this issue, please contact Liz Peterson, Senior Conservation Planning Officer at elizabeth.peterson@environment.nsw.gov.au.

Yours sincerely

30/01/2025

Susan Harrison,
Senior Team Leader, Planning
Greater Sydney Branch
Regional Delivery
Conservation Planning, Heritage and Regulation

Attachment A - CPHR biodiversity comments - Response to Submission - Pymble Golf Course - Planning Proposal PP-2022-2519

CPHR original comments	Proponent response	CPHR response
<p>The Ecological Constraints Analysis (ECA) and PP have identified that the subject land contains Blue Gum High Forest (BGHF) and Sydney Turpentine Ironbark Forest (STIF), both critically endangered ecological communities (CEECs) listed under the <i>Biodiversity Conservation Act 2016</i> (BC Act). Under the BC Act 'critically endangered' means the ecological community is facing an extremely high risk of extinction in Australia in the immediate future. Both BGHF and STIF can occur as single trees.</p>	Noted	No further comment.
<p><i>Biodiversity Offsets Scheme</i></p> <p>The ECA correctly identifies that future development applications on the site will likely result in development that exceeds the Biodiversity Offset Scheme (BOS) threshold under the BC Act. It should also be noted that if any future development on the site is State significant development, under s.7.9 of the BC Act, it will require a Biodiversity Development Assessment Report unless the Planning Agency Head and the Environment Agency Head determine that the development is not likely to have any significant impact on biodiversity.</p>	Noted	No further comment.
<p>For both State significant development and local development, this will require SAI to be assessed.</p>	Noted	Refer to comments below.

Serious and Irreversible Impacts (SAIL)

BGHF and STIF are threatened entities that are likely to be at risk of a SAIL (*Biodiversity Conservation Regulation 2017*, cl 6.7), which must be addressed in accordance with s 9.1 of the Biodiversity Assessment Method 2020. The ECA does not include an assessment that would allow the approval authority to determine whether removing any BGHF or STIF on this site for future development will constitute a SAIL. If the planning proposal is made without sufficient consideration of SAIL it could mean that future development is unable to be approved in line with the requirements under s 7.16 of the BC Act.

It is not proposed to remove or any BGHF or STIF on this site for future development, as the development is largely contained within existing developed areas of the site (car park and club house building). It is acknowledged removal of any BGHF or STIF on this site could mean that future development is unable to be approved in line with the requirements under s 7.16 of the BC Act, however, suggested that the proposed development footprint has sensitively considered these potential future impacts as part of the comprehensive site and context analysis preceding submission of the PP.

CPHR supports the response for the following reasons:

- The Urban Design Report prepared by Mayoh, version 5, dated March 2023 outlines three design options that were considered. Option 3 was chosen in part due to the predicted ability to retain all high significance trees on site (including all trees descriptive of BGHF and STIF).
- The Ecological Constraints Assessment (ECA), prepared by Narla, dated June 2022 identified that BGHF is made up of fragmented (large) trees only with the mid-stratum absent and the groundcover made up of exotic species, and that STIF is made up of three remnant trees only without the presence of a mid-stratum or groundcover vegetation. Given this, only trees appear to make up the two CEECs identified on site.
- The Preliminary Arboriculture Impact Assessment (PAIA) prepared by Seasoned Tree Consulting, dated 27 January 2023 identified that all trees that make up the two CEECs will be retained. The report further identified that most of these trees will experience a 'major' encroachment into their Tree Protection Zone (TPZ) due to the proposed development ['major encroachment' as per the Australian Standard AS 4970-2009]. The report concluded that these trees "will" be viably retained by employing tree sensitive construction techniques.

CPHR notes that if the viable retention of trees is achieved, no assessment for SAIL would be required. It is however noted that no details of the type of tree sensitive construction techniques have been provided and the PAIA has not demonstrated how trees will be retained viably (in line

		<p>with s3.3.3 and 3.3.4 of the Australian Standard AS 4970-2009).</p> <p>In the absence of this evidence, and in line with CPHR's original comments and the acknowledgment in the proponent's response, there remains a risk that the decision maker may determine that a SAll is triggered when a development application is submitted, should the trees that make up the CEECs not be able to be viably retained, with the potential consequence that the future development application is not supported.</p> <p>To reliably assess the viable retention of trees, detailed and refined architectural and stormwater plans will be required. It is considered that the appropriate time for the submission of these detailed plans is the development application stage rather than the current PP stage.</p> <p>CPHR advises that updated plans for the development application should be refined in consultation with a suitable experienced AQF level 5 arborist. An Arboriculture Impact Assessment (AIA) is also to be provided as part of a future development application, demonstrating how trees that form part of STIF and BGHF will be viably retained.</p>
<p><i>Fauna Surveys</i></p> <p>Further surveys or justification as to why further surveys aren't required will need to be undertaken prior to or at the development application stage for the threatened fauna deemed as having potential to occur in the Survey Area (Section 3.3, Table 4 of the ECA).</p>	Noted	Relevant for future development application.

End of Submission



RFS



Ku-ring-gai Council
Locked Bag 1006
GORDON NSW 2072

Your reference: (REF-3141) PP-2022-2519
Our reference: SPI20240919000188

ATTENTION: Alexandra Plumb

Date: Wednesday 2 October 2024

Dear Sir/Madam,

**Strategic Planning Instrument
Rezoning**

**Rezoning and amendment of Ku-ring-gai Local Environmental Plan 2015 at 4,12 & 14 Cowan Road St Ives
(Pymble Golf Club)**

I refer to your correspondence dated 13/09/2024 inviting the NSW Rural Fire Service (NSW RFS) to comment on the above Strategic Planning document.

The NSW RFS has considered the information submitted and subsequently raise no concerns or issues in relation to bush fire.

For any queries regarding this correspondence, please contact Simon Derevnin on 1300 NSW RFS.

Yours sincerely,

Bryce Pascoe
**Supervisor Development Assessment & Plan
Built & Natural Environment**

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
F (02) 8741 5550
www.rfs.nsw.gov.au

Our ref: DOC24/753153

Your ref: REF-3140

Alexander Galea
Manager, Planning Proposal Authority
Department of Planning, Housing and Infrastructure
alexander.galea@dpie.nsw.gov.au

CC: Shruthi Sriram
Planning Officer, Planning Proposal Authority
shruthi.sriram@dpie.nsw.gov.au

Planning Proposal – Pymble Golf Club – 4, 12 and 14 Cowan Road, St Ives

Dear Alexander

Thank you for the opportunity to provide advice on the planning proposal to make amendments to *Ku-ring-gai Local Environmental Plan 2015* (LEP) for part of Pymble Golf Club at 4, 12 & 14 Cowan Road, St Ives, to rezone the site to part R4 High Density Residential and part RE2 Private Recreation, and to relocate and heritage list the timber cottages currently located at 12 and 14 Cowan Road.

We note that this planning proposal was subject to a rezoning review, requested by the proponent, as Ku-ring-gai Council did not support the proposal. The Sydney North Planning Panel subsequently recommended that the planning proposal should proceed to Gateway determination as it had both strategic and site-specific merit.

Heritage NSW has reviewed the planning proposal and supporting documents and prepared the following advice.

Local heritage considerations under the *Environmental Planning and Assessment Act 1979*

The Statement of Heritage Impact (SOHI) prepared in support of the proposal noted that:

- Pymble Golf Club House had been highly modified, and no longer demonstrates the Spanish architectural style in which it was designed and constructed, as such overall it didn't meet the criteria for listing at a Local level, except for social significance
- 12 Cowan Road demonstrated historical, associative, aesthetic and representative significance for listing at a Local level, as well as being a rare example of a timber cottage in the local area
- 14 Cowan Road demonstrated historical, aesthetic and representative significance for listing at a Local level, as well as being a rare example of a timber cottage in the local area.

Informed by the SOHI, the planning proposal identifies the following response:

- demolition of Pymble Golf Club House and replacement with a contemporary facility
- relocation of timber cottages from 12 and 14 Cowan Road to within the general area of the site and listing as Local heritage items, and restoration to remove later additions and reinstate original detailing.

While Heritage NSW considers that heritage listing and restoration of these two cottages is a positive heritage outcome, we recommend that consideration is given to retaining the proposed Local heritage items *in situ* and making design changes to the proposed residential development. If retention *in situ* is not possible then the Conservation Management Plan for the proposed items should include a detailed plan for the relocation and consideration of any associated heritage impacts.

We note that the Heritage Council of NSW, and Heritage NSW as its Delegate, do not have a role in the approval of new Local heritage items to Council LEPs. As Local heritage is protected under the *Environmental Planning and Assessment Act 1979* and under Council LEPs, this responsibility usually rests with Council. As the planning proposal has been subject to a rezoning review, the Sydney North Planning Panel is responsible for determining whether the cottages should be heritage listed.

If you have any questions about the above, please contact James Sellwood by phone on 02 9274 6354 or by email at james.rm.sellwood@environment.nsw.gov.au.

Yours sincerely



Rose O'Sullivan
Practice Lead, Planning Referrals and Advice
Heritage NSW
31 October 2024

25/10/2024



24-28 Campbell St
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GPO Box 4009
Sydney NSW 2001
T +61 2 13 13 65
ausgrid.com.au

To Whom it May Concern,

RE: Planning Proposal PP-2022-2519 - Pymble Golf Club, St Ives.

Ausgrid would like to thank you for seeking input and feedback regarding this planning proposal.

Ausgrid requires that due consideration be given to the compatibility of proposed development with existing Ausgrid infrastructure, particularly in relation to risks of electrocution, fire risks, Electric & Magnetic Fields (EMFs), noise, visual amenity and other matters that may impact on Ausgrid or the development.

The below information is to be considered as preliminary advice for this proposal.

Ausgrid will look forward to reviewing future Development Application submissions for any development attached to this proposal and will then provide further feedback accordingly.

Ausgrid Underground Cables are in the vicinity of the development.

Special care should be taken to ensure that driveways and any other construction activities do not interfere with existing underground cables located in the footpath or adjacent roadways.

It is recommended that the developer locate and record the depth of all known underground services prior to any excavation in the area. Information regarding the position of cables along footpaths and roadways can be obtained by contacting Before You Dig Australia (BYDA)

In addition to BYDA the proponent should refer to the following documents to support safety in design and construction:

SafeWork Australia – Excavation Code of Practice.

Ausgrid's Network Standard NS156 which outlines the minimum requirements for working around Ausgrid's underground cables.

The following points should also be taken into consideration.

Ausgrid cannot guarantee the depth of cables due to possible changes in ground levels from previous activities after the cables were installed.

Should ground levels change above Ausgrid's underground cables in areas such as footpaths and driveways, Ausgrid must be notified, and written approval provided prior to the works commencing.

Connecting communities,
empowering lives

Should ground anchors be required in the vicinity of Ausgrid underground cables, the anchors must not be installed within 300mm of any cable, and the anchors must not pass over the top of any cable.

Ausgrid Overhead Powerlines are in the vicinity of the development.

The developer should refer to SafeWork NSW Document – Work Near Overhead Powerlines: Code of Practice. This document outlines the minimum separation requirements between electrical mains (overhead wires) and structures within the development site throughout the construction process. It is a statutory requirement that these distances be maintained throughout the construction phase.

Consideration should be given to the positioning and operating of cranes, scaffolding, and sufficient clearances from all types of vehicles that are expected be entering and leaving the site.

The “as constructed” minimum clearances to the mains must also be maintained. These distances are outlined in the Ausgrid Network Standard, NS220 Overhead Design Manual. This document can be sourced from Ausgrid’s website at www.ausgrid.com.au.

It is the responsibility of the developer to verify and maintain minimum clearances onsite. In the event where minimum safe clearances are not able to be met due to the design of the development, the Ausgrid mains may need to be relocated in this instance. Any Ausgrid asset relocation works will be at the developer’s cost.

New Driveways - Proximity to Existing Poles

Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.

New or modified connection

To apply to connect or modify a connection for a residential or commercial premises.

Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable. Visit the Ausgrid website for further details; <https://www.ausgrid.com.au/Connections/Get-connected>

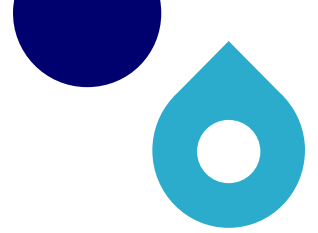
Additional information can be found in the Ausgrid Quick Reference Guide for Safety Clearances “Working Near Ausgrid Assets - Clearances”. This document can be found by visiting the following Ausgrid website:
www.ausgrid.com.au/Your-safety/Working-Safe/Clearance-enquiries

Please do not hesitate to contact me for further information.

Regards,



Paul Nakhle - Portfolio Manager - Asset Protection | Transmission Services
02 9269 7587 | 0419 631 174



1 October 2024

Our reference: N/A

Shruthi Sriram

Department of Planning, Housing and Infrastructure

shruthi.sriram@dpie.nsw.gov.au

RE: Planning Proposal PP-2022-2519 Pymble Golf Club at 4, 12 and 14 Cowan Road, St Ives

Thank you for notifying Sydney Water of the planning proposal regarding PP-2022-2519 at 4, 12 and 14 Cowan Road, St Ives, which proposes the following amendments to the Ku-ring-gai LEP 2015:

- Rezone part of the site to R4 High Density Residential, while retaining the RE2 Private Recreation Zone over the remainder of the site for the ongoing use of the site as a recreation facility (outdoor), being a golf course with ancillary clubhouse, parking and maintenance facilities,
- Amend the Height of Buildings control to 11.5m, 14.5m and 17.5m to enable residential flat building development 3-5 storeys in height,
- Amend the Floor Space Ratio control to a maximum of 0.92:1,
- Amend the Heritage Map to heritage list 12 and 14 Cowan Road within Schedule 5.

The proposed amendments may facilitate high density residential housing for approximately 78 dwellings.

We have reviewed the application based on the information supplied and provide the following comments for your information to assist in understanding the servicing needs of the proposed development.

Water and Wastewater Servicing

- Our preliminary assessment indicates that water and wastewater servicing should be available for the proposed development.
- Amplifications, adjustments, deviations and/or minor extensions may be required.
- Detailed requirements will be provided at the S73 application stage.

Trade wastewater requirement

- If this proposed development is anticipated to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's wastewater system. Applicant must wait for approval and issue of a permit before any business activities can commence.
- The permit application can be made on Sydney Water's web page through Sydney Water Tap In. <http://www.sydneywater.com.au/tapin/index.htm>

Sydney Water Corporation ABN 49 776 225 038

1 Smith Street, Parramatta, NSW 2150 | PO Box 399, Parramatta, NSW 2124

Telephone 13 20 92 **Media (24/7)** 8849 5151 sydneywater.com.au



Protection of Assets

This letter constitutes high-level initial advice only. Further advice from Sydney Water may be offered during the exhibition, the feasibility or, S73 stages with regards to the protection of our existing and proposed assets/easements and any requirements pertaining to building over or adjacent to Sydney Water assets. These aspects will be investigated as we receive more detail, and specific protection requirements, objections or amendments will be documented as they progress.

Next steps

- The Department is advised to forward the enclosed *Sydney Water Planning Proposal Information Sheet (for proponent)* to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and further information on Infrastructure Contributions.

The development servicing advice provided is not formal approval of our servicing requirements and is based on the best available information at the time of referral (e.g. planning proposal). It is important to note that this information can evolve over time in tandem with the progression of other development projects in the catchment, changes within the local systems and receiving works. This is particularly important in systems with limited capacity. Furthermore, Sydney Water does not reserve or hold capacity for proposed developments, regardless of whether the area has been rezoned or not. To ensure accuracy and alignment with current conditions, it is best to approach Sydney Water for an updated capacity assessment particularly if a referral response letter is more than 12 months old.

Should the Department require further information, please contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,



Kristine Leitch

Manager, Growth Planning
Growth and Development
Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- [Sydney Water Planning Proposal Information Sheet \(for proponent\)](#)

Sydney Water Planning Proposal Information Sheet for Proponent

Sydney Water has provided advice to the Department/Council on your proposed planning proposal. Further steps are required to ascertain servicing timescales and staging align with your development. Please read the information below to assist with your development. Further information can also be found on our website sydneywater.com.au.

Feasibility

Why have I been advised to carry out a Feasibility enquiry?

If the development presents potentially large water servicing demands on drinking water, wastewater, recycled water and stormwater where applicable or asset impacts are anticipated, further investigation may be required to determine the servicing requirements for the site.

It is recommended that a Water Servicing Coordinator is engaged to ensure early discussion on your proposed development so it is considered in any potential planning that we might be undertaking. We advise you do this as soon as possible to prevent potential delays to your development approvals or servicing.

This process is also evidenced in the referral criteria for authorities and government agencies in the State Government's [Local Environmental Plan Making Guideline – Attachment B Authority & Government Agency Pre-lodgement](#).

How do I apply for a Feasibility?

To apply for a Feasibility, you will need to contact a Water Servicing Coordinator. Tell them you have been advised to lodge a Feasibility as part of your development application.

Growth Data Form

Why do I need to complete a Growth Data Form as part of the Feasibility application?

If you have been requested to provide growth data, it is likely your planning proposal may lead to development with significant servicing needs, especially in areas not previously identified for substantial growth. To ensure thorough servicing advice and explore staged servicing options, we need anticipated growth data and indicative development staging, including yield per stage, as specified in the Growth Data Form in **Appendix 1**.

Trade wastewater for business customers

I am a business customer and my development may generate commercial or industrial trade wastewater. What do I do?

If your development is going to generate trade wastewater, you must have written approval to connect your business to our network, and properly install and maintain appropriate treatment equipment before any business activities can commence. It is illegal to discharge trade wastewater into the Sydney Water sewerage system without permission.

How to apply for approval to discharge?

Complete an application for connection to discharge trade wastewater at Sydney Water [Tap in®](#) or contact businesscustomers@sydneywater.com.au for further information.

Infrastructure Contributions

What are infrastructure contributions?

Infrastructure contributions are a payment towards the cost of infrastructure needed to provide water-related services to new developments. The contributions are set to be reintroduced by Sydney Water from 1 July 2024 followed a decision by the NSW Government.

Please note existing charges still apply for the recycled water schemes provided by Sydney Water.

How do infrastructure contributions impact me?

Infrastructure contributions for drinking water and wastewater will be payable for all developments that require a Section 73 Compliance Certificate to be issued from 1 July 2024 onwards. The contributions will be gradually reintroduced such that they will be capped at 25 percent in 2024-25 and 50 percent in 2025-26, with full contributions payable from 1 July 2026 onwards, in line with a transition plan approved by the NSW Government.

You can find more information on the reintroduction of drinking water and wastewater contributions at [Infrastructure contributions | Sydney Water Talk](#).

I am building in the Western Sydney Aerotropolis Precincts. How does this impact me?

The NSW Government has appointed Sydney Water as the Regional Stormwater Authority in the initial Western Sydney Aerotropolis precincts, including the Mamre Road Precinct.

If you are building in the Aerotropolis Initial Precincts, you will be required to pay infrastructure contributions towards Sydney Water's stormwater and recycled water servicing. The estimated amount of contributions for stormwater and recycled water servicing will be provided at the Notice of Requirements issued during the Section 73 application.

You can find more information on Mamre Road and Aerotropolis Infrastructure Contributions at [Mamre Road and Aerotropolis development](#).

Water Servicing Coordinator

What is a Water Servicing Coordinator?

Water Servicing Coordinators are accredited providers who can manage your Sydney Water applications for you.

They can design new pipes, manage applications for Section 73 Compliance Certificates and Feasibilities, applications for approval to move or extend our pipes, design and construction of new pipes, and applications for approval to build over or next to assets.

All Water Servicing Coordinators have designer accreditation and can provide design services.

How do I find a Water Servicing Coordinator?

Please follow this link to find a list of Water Servicing Coordinators: [Water servicing coordinators](#)

Quick Links

[Growth Servicing Plan](#)

[Water servicing coordinators](#)

[Infrastructure contributions](#)

[Steps for first time developers](#)

[Mamre Road and Aerotropolis development](#)

[Managing trade wastewater](#)

[Local Environmental Plan Making Guideline – Attachment B Authority & Government Agency Pre-lodgement](#)

Appendix 1. Example of growth data form and planning timescales

The following is an example of the level of intel that we require to assess the potential staging and phasing of asset upgrades. We acknowledge that this information is an indication only and is provided as a guide to assist SW to provide more nuanced feasibility or servicing advice. We note that timescales are often subject to developer intent/demand and approval timescales. Sydney Water uses the information at its own risk.

Anticipated planning timescales										
Reference number	Project name	Date updated	Pre-lodgement or lodgement	Submission to Gateway	PP Exhibition	Anticipated rezoning	Anticipated DA lodgement	Anticipated first connection	Status/Comments	Estimated growth numbers (or range) dwellings/jobs
Example: PP-2023-xxxx	100 Main Street, Leppington	Today's date	Jul-23	Dec-24	Jun-25	Dec-25	Mar-26	2027	Completed preliminary planning assessment. To be lodged to LPP in June 2024.	500 dwellings

Anticipated planning timescales								
Project name:	Address:		Sydney Water Ref. Number and PP Ref. Number:					
Development Type	Ultimate proposed new growth	Total #stages	2024	2025	2026	2027	2028	Continue as required
Example (dwelling multi)	700	2	0	0	0	350	350	
Example (job number)	700	3	0	0	200	200	300	
Dwellings (single)								
Dwellings (multi)								
Jobs (number)								
Jobs (GFA)								