

22 April 2014

The General Manager
Ku-ring-gai Council
818 Pacific Highway
GORDON NSW 2072

Attn: Jonathan Goodwill

Dear Jonathan,

**Re: DA No. 03027/13 – 742, 746, 746A and 748 Pacific Highway, Gordon
Lawson Clinic
Amended Plans in Response to Council's Comments**

I am writing with regard to the above Development Application (DA), Council's correspondence dated 26 November 2013, the urban design comments dated 13 December 2013 and 21 March 2014, the meeting with the applicant and Council held on 4 March 2014 and issues raised as a result of the public exhibition of the proposal. The issues raised in this correspondence are addressed below and the accompanying amended plans and reports: -

Accompanying Plans and Reports	Prepared by and date
Architectural Plans, Elevations, Sections, Sun Assessment, Renders and Photomontages	Elevation Architecture January 2014
Landscape Plans	Pete Gilliland Landscape Design 13 March 2014
Heritage Assessment	NBRS+Partners 7 April 2014
Stormwater Concept Plan	AT&L April 2014
Traffic and Parking Assessment	URaP – TTW 4 April 2014
Arboricultural Impact Assessment	Landscape Matrix 7 April 2014
Geotechnical Investigation	JK Geotechnics 31 March 2014
ESD Report	WSP 21 March 2014
BCA Compliance Statement	Comcert Building Surveyors 17 April 2014
Property Valuation 744 Pacific Highway, Gordon	Mark O'Neill Valuations 10 December 2013
Amended Clause 4.6	CPSD April 2014

As an overview, the concerns raised by Council, Council's urban design consultant and the public have been carefully considered by the applicant. This is reflected in the amended proposal that accompanies this correspondence, which delivers a built form and layout which is sensitive to its surrounding built form, and provides a valuable public benefit which is compatible with its neighbours. Of utmost importance, the amended proposal has been design to satisfy the stringent design considerations as required by NSW Health for a private hospital and ensure that this building functions as a high quality facility which services the needs of the professional health consultants and their patients.

The amended proposal consists of the construction of a 65 bed facility with a gross floor area of 2,910.3m². The proposed development consists of the following: -

- Demolition of three (3) existing dwellings;
- Construction of a three storey building with car parking under (19 spaces);
- Retention of the existing Lawson Clinic premises at No. 748 Pacific Highway with improved vehicular access via the central driveway and 12 parking spaces;
- Upgrading of two (2) existing vehicular access points to the site from the Pacific Highway;
- Dedicated pedestrian access along the northern boundary;
- Removal of 17 trees from the site;
- Associated landscaping works;
- Stormwater Management System which connects to Bushlands Avenue to the south;
- Identification signage for the driveway at No. 746 Pacific Highway; and
- The consolidation of three (3) lots (Lots 1 & 2 DP 851223 and Lot C DP 337904) into a single lot with the realignment of the boundary of Lot A DP 350224 to result in 2 lots of 3,406m² and 1,309.6m² respectively.

The following table summarises the development statistics of the amended design: -

Table 1: Development statistics

	Existing	Original Proposal	Amended Proposal
Site Area	4,719m ² over 4 lots	4,719m ² over 2 lots	4,719m ² over 2 lots
Building site coverage	-	Lot 1: 1,296.3m ² / 35% Lot 2: 366.8m ² / 28%	Lot 1: 1,135m ² / 34% Lot 2: 450m ² / 32%
GFA	-	3,037.8m ²	3,277.1m ²
FSR	-	0.64:1	0.69:1
Deep Soil Zone	-	30%	26.9%
On-site Car Parking	21 car parking spaces	35 car parking spaces 2 service vehicle loading bays	31 car parking spaces 2 service vehicle loading bays
Patient Beds	0	65	65
Patient Rooms	0	50	48
Staff - Day	4 - 8 doctors 2 - 3 admin staff 0 nurses 0 cleaners	4 - 8 doctors 6 administrative staff 9 nurses 2 cleaners	4 - 8 doctors 6 administrative staff 9 nurses 2 cleaners

Staff - Night	0	1 - 2 admin staff after hours / weekends 6 nurses 2 cleaners	1 - 2 admin staff after hours / weekends 6 nurses 2 cleaners
Operating Hours	8am to 6pm Monday to Friday	Lawson Clinic Outpatient Unit to continue to operate at current hours. Inpatient unit to operate 24 hours	Lawson Clinic Outpatient Unit to continue to operate at current hours. Inpatient unit to operate 24 hours

Issues Raised by Council

Each of the issues raised in Council's correspondence dated 26 November 2014 is addressed in Points 1 to 10 below: -

1. Overshadowing

Council raised concern with regard to the amount of overshadowing, particularly in the morning period, to the existing dwelling to the west of the subject site No. 22 St Johns Avenue.

Refer to the attached Sun Shade diagram (DA05.05) and comparative sun shading plan (DA05.08) which demonstrates the existing extent of solar access enjoyed by No. 22 St Johns Avenue in the morning, compared to the impact of the proposed development. This comparison is summarised in the following Table.

Table 2: Comparative table of shadow impact on No. 22 St Johns Avenue

Existing Shadow Impact	Proposed
Midwinter 8am - Pool area completely in full shadow - All sun facing walls in shadow - Most parts of sun facing roofs in sunshine	Midwinter 8am - Pool area completely in full shadow - All sun facing walls in shadow - Minimal parts of sun facing roofs in sunshine
Midwinter 9am - 1/2 the pool area completely in shadow - Majority of sun facing walls in sunshine - All sun facing roofs in sunshine	Midwinter 9am - Pool area completely in full shadow - 2/3 sun facing walls in sunshine - Most parts of sun facing roofs in sunshine
Midwinter 10am - 1/2 the pool area in shadow - All sun facing walls in sunshine - All sun facing roofs in sunshine	Midwinter 10am - 1/2 the pool area in shadow - All sun facing walls in sunshine - All sun facing roofs in sunshine
Midwinter 10:30am - Entire property in sunshine	Midwinter 10:30am - Entire property in sunshine

This additional overshadowing is an incremental increase compared to that caused by the existing two storey dwellings on the site, and results in additional overshadowing for a limited period of time in the morning.

2. Site Isolation and Amalgamation

Refer to the attached independent valuation for No. 744 Pacific Highway, Gordon, prepared by Mark O'Neill Valuations and dated 10 December 2013.

As requested, the proposed site plan reflects the existing dwelling at No. 744 Pacific Highway, Gordon.

Council's concern with regard to the Concept Plan for the redevelopment of No. 744 Pacific Highway, Gordon as a residential flat building with shared driveway access with the subject site is noted. This option has been offered as a practical solution to potential future redevelopment. However, given No. 744 Pacific Highway benefits from an existing driveway crossing off the Pacific Highway, we propose that any future redevelopment can also be achieved with safe and viable driveway and pedestrian access via the Pacific Highway. Therefore, we maintain that the adjoining site at No. 744 Pacific Highway is capable of future redevelopment and is not isolated.

3. Pedestrian Access and Equitable Access

Council has raised concern with regard to the pedestrian accessibility for the proposed facility, particularly stating that *"the design of the premises does not appear to accommodate patients and visitors that may travel to the site by means other than a private car or taxi"*. There are issues regarding the current path of travel, including *"a ramp with a gradient significantly steeper than 1:14"*.

In response to the amendments requested by Council, the amended proposal seeks to resume the existing driveway along the northern boundary and provide a dedicated pedestrian pathway connecting the Pacific Highway to the existing Lawson Clinic and the new Hospital facility. The proposal now benefits from a defined pedestrian entry path which creates an inviting design outcome complemented by additional landscaping. This reuse of the former driveway entrance to Lawson Clinic is framed by the heritage items and is supported in the attached heritage assessment provided by NBRS+Partners. The amended proposal achieves direct fire exit paths and safe and equitable access throughout.

4. Energy and Water Efficiency

As requested by Council, an ESD Report prepared by WSP accompanies this submission. This report fully addresses the requirement of the Development Control Plan and concludes that the proposed development will incorporate effective ESD measures to achieve energy and water efficient operations.

Further to this report, the amended design optimises the opportunity for solar access to this site, by introducing an accessible courtyard at the north-western corner of the Hospital building which will enjoy a northerly aspect and an internal layout with minimal southerly facing windows and the orientation of windows which capture direct sunlight. The amended design provides improved natural lighting to the public areas throughout the development.

5. Use of 742 Pacific Highway

In recognition of the concerns raised by Council and Council's urban design consultant with regard to the retention and use of No. 742 Pacific Highway, the amended design seeks to satisfy Council's recommendation to demolish this building, and modify the layout of the proposed development to provide a more cohesive built form with an improved relationship with respect to the overall site and surrounds.

The development statistics for the proposal are detailed above, which confirm that the number of doctors and support staff are maintained as per the original proposal. These numbers have been reviewed by the applicant and operators of the Lawson Clinic and accurately reflect the future operations.

6. Colours and Finishes

Refer to the attached updated External Colour and Materials Schedule (DA-03.03). To provide confirmation of the colours and finishes south, this schedule includes details of the product / finish, a material image, colour name and image, and details of the supplier. These details are also referenced on the Elevation Plans (DA-05.01 and DA-05.02) for accuracy and completeness.

7. Heritage

Council's heritage consultant has also raised concerns with regard to the loss of *"meaningful garden space between the heritage item and hospital,"* the footprint of the hospital which is recommended to be relocated and/or altered so as to maximise deep soil planting space, the setbacks for the upper levels of the hospital, and scale of the proposal which is considered to be too prominent when viewed from the publicly accessible areas of the church grounds and cemetery.

In response to the above concerns the proposal consists of several modifications which are assessed in the attached Heritage Response prepared by NBRSPartners. As summarised in this advice, the above concerns are resolved by implementing the following modifications to the proposal: -

- *"a change to the building envelope to keep it outside of the existing heritage listed lot;*
- *adjustment of the lot boundaries to comply with BCA requirements;*
- *setting back further from the north boundary adjacent to the Church and west boundary adjoining residential lots;*
- *rotation of the plan to create a longer wing with eastern outlook extending onto the adjoining site to the south and the resultant demolition of the existing house on that site;*
- *reduction of the extent of the third floor to reduce visual bulk; and*
- *conversion of the existing northern driveway to a pedestrian entrance and the creation of direct access between the old and new clinic buildings to the main entrance."*

Refer to the attached Heritage Response which provides further detailed justification in support of the amended design.

Also refer to the attached Photomontage Plan (DA-05.11) which demonstrates the proposed development as viewed from the public domain at Pacific Highway and from within the adjoining Church site. The proposal provides a mix of suitable setbacks, architectural design elements and landscape buffer screening which effectively ameliorate the visual presentation of the building.

We recognise that Council's heritage officer has raised concern with regard to the application of the setbacks in accordance with Council's Development Control Plan (DCP). Further to the heritage advice which accompanies this submission and as previously identified in the Statement of Environmental Effects (SEE), we wish to reiterate that this application for a Hospital facility is sought under the provisions of SEPP (Infrastructure) 2007. Furthermore, the applicable DCP which Council is applying relates to residential developments, which is not the case with this application.

In addition, it is recognised that the *Environmental Planning and Assessment Bill 2012* passed the Legislative Assembly and was introduced without amendment to the Legislative Council on 24 October 2012 and has now been enacted. The reforms establish that the primary purpose of DCPs will be to provide "guidance" to implementing the aims of EPIs (being LEPs or SEPPs) and achieving the objectives of the planning zone.

As such, the consent authority is required to give less weight and significance to provisions of a DCP than those of an EPI and will no longer be permitted to place determinative weight on DCP controls because of their prior consistent application.

Given this, the proposal has been designed with every effort to minimise the visual impact of the building from the surrounding properties in terms of setbacks from the boundaries, landscaping and the format and massing of the building.

The references to the DCP being applied by Council refer to residential flat buildings, which is a different building form and land use to that which is being proposed. A residential flat building would assume a large number and size of window and door openings as well as balconies along the facades of a RFB. This high level of activity would warrant an increased setback as suggested by Council. However, the proposed building form and land use results in a largely self-contained building with the focus of the activity away from the neighbouring properties. This is reinforced through the high set windows which are unopenable and treated with privacy screens to deter direct views from the windows to neighbouring properties.

In as much, we request that the proposal is assessed on merit with regard to this particular Hospital use which is not directly considered in Council's controls. The proposed setbacks and building design is appropriate within the context of the site and requirements of NSW Health.

8. Development Engineering

Each of the comments from Council's Development Engineer have been considered in detail and addressed. The amended proposal provides a holistic development approach which balances the needs of the car parking, vehicular access, stormwater management and groundwater management.

Refer to the following supporting documentation which addresses each of these items: -

- Stormwater Concept Plan prepared by AT&L
- Traffic and Parking Assessment prepared by URaP – TTW
- Geotechnical Investigation prepared by JK Geotechnics

The details of these plans are further detailed on the amended Architectural Plans prepared by Elevation Architecture.

As required by Council, the proposed stormwater management system consists of an underground OSD system with a legal point of discharge to Bushlands Avenue via the adjoining property at No. 740 Pacific Highway. The attached Stormwater Concept Plan prepared by AT&L demonstrates that this stormwater system is achievable, and in order to establish this downstream property easement the applicant has approached the owners of No. 740 Pacific Highway to negotiate this easement. The parties are presently in discussions with a view to giving legal effect to the applicant's request.

9. Landscaping

Deep Soil Landscape Area

In response to concerns raised by Council's landscape officer, the amended Landscape Plans prepared by Peta Gillilands Landscape Design reinforce the opportunities for landscape treatment throughout the site with particular attention along the boundaries of the site. The proposal is for the retention of the heritage item and associated car park which occupies a significant area of hardstand area. This existing situation restricts the opportunity for landscaping in the area and the resulting numerical requirement for deep soil planting. Despite this, the proposed landscape treatment respects the garden character of the Heritage Conservation Area and balances that layout of the development and the required fire protection and access paths.

The amended proposal delivers increased setbacks to the north and western boundaries, when considered in light of the boundary fencing and articulation in the built form, comprises a mix of trees, shrubs and ornamental planting which create visual interest and privacy screening for the neighbouring properties.

The proposed setbacks are capable of accommodating the proposed landscaping and supporting their long term growth and health.

The paved areas required for fire protection and access paths are direct in order to maximise planting opportunities along the boundaries.

This amended design also provides multiple areas of planting to enhance the setting of the existing heritage building and its car park, including vertical garden at the western edge of the car park, pockets of landscaping where available, and landscape strips along the sides of the new dedicated pedestrian entry pathway along the northern boundary of the site.

The proposed extent of landscaping delivers a landscaped setting which is compatible with the context of the neighbouring residential buildings, the church and cemetery.

Adverse Tree Impacts

The proposal seeks to retain Tree 20 (*Magnolia*) which is located along the western boundary, and provides increased setbacks to protect the health of the tree during construction.

The proposal also seeks to retain Tree 21 (*Purple Glory Tree*) which is located at the north-western boundary of the site, and provides increased setbacks to enable the retention of this tree.

10. Further Information Required

In response to Council's request for additional information, please refer to the following supporting plans: -

- i. Deep Soil calculations are provided on the Deep Soil Plan prepared by Peta Gillilands Landscape.
- ii. Detailed Architectural Plans prepared by Elevation Architecture.
- iii. Amended and detailed Landscape Plans are provided which address the issues raised. These plans are prepared by Peta Gillilands Landscape. Also refer to the attached assessment letter prepared by Landscape Matrix which addresses the impact of the proposed stormwater system on trees in the site.
- iv. Refer to the Site Environmental Management Plans prepared by Elevation Architecture (DA-01.09).

Urban Design Comments

The following comments and justification is provided in response to each of the issues raised in Council's urban design comments dated 21 March 2014: -

11. Support in principal to demolish No. 742 Pacific Highway and extend the footprint of the building footprint

The comments provided by the urban design consultant have been carefully considered, and by way of further clarification, the following explanation reiterates how these design principles have been resolved.

The proposal provides increased setbacks to the north and western boundaries, with a mix of trees and planting which complement the building form and create a high level of visual interest. Further recognition of the Church and cemetery is created at the north-western corner of the site through the introduction of a courtyard.

The proposal provides an optimal layout with regard to the overall dimensions of the site due to the recent opportunity to demolish the building at No. 742 Pacific Highway. The proposal provides an overall layout, and more importantly an internal layout which adheres to the strict

design requirements of NSW Health. The primary design of this layout responds to the needs of the staff and patients, whilst also providing a design which achieves accessibility and is compatible with this locality.

With regard to setbacks as required by the DCP, refer to the detailed discussion provided in Section 7 above.

Each of the outdoor courtyard and deck areas are orientated to take advantage of solar access and support the operations of the Hospital. The proposal provides a suitable interior-external relationship which responds to the multiple design and heritage constraints of the site.

12. Pedestrian Access

The proposal provides a dedicated pedestrian pathway along the northern boundary of the site, with clear access to the existing Lawson Clinic and the new Hospital. Each of these pathways are complemented by landscaping which creates a sense of entry which is formalised by the new entry point to the Hospital. Refer to the attached Photomontages prepared by Elevation Architecture (DA-05.09). The pedestrian access also satisfies the fire protection and access paths.

Each of the designated parking areas benefit from direct access to the building with vehicles and pedestrians able to circulate the site with ease.

13. Building Separation

With regard to sufficient width to accommodate healthy growth of trees, refer to the detailed discussions in **Point 9** above. The proposed setbacks are capable of accommodating the proposed landscaping and supporting their long term growth and health.

Although the urban design consultant has indicated that substantial setbacks and significant outdoor spaces is preferred, this does not offer operational benefits to a facility such as this. The proposed inpatient unit is required to satisfy strict NSW Health regulations and has been designed as such. In addition, the design of the building and its surrounds is a product of the extensive experience of its associated healthcare professionals. From their professional experience, such outdoor spaces pose a health risk to future patients and difficulties for the staff looking after their safety and welfare. Although the urban design consultant has identified inefficiencies with regard to the internal layout of the building, these inefficiencies are not high order design requirements, and the current proposal reflects the pertinent aspects of the Hospital which are highly efficient to deliver this important service to the community.

14. Hierarchy of Spaces

The amended proposal provides a configuration which addresses clear way-finding throughout. As identified in **Point 2** above, direct pedestrian and vehicular paths of travel are provided which relate to both the existing Lawson Clinic and the proposed inpatient clinic.

The proposal provides a dedicated pedestrian entry along the northern boundary of the site.

The proposal provides a dedicated vehicular entry at the central driveway for staff, visitors and deliveries. A further driveway is provided at the southern boundary of the site which is dedicated for staff. The proposal accommodates safe vehicular movement and circulation throughout.

The inpatient clinic also benefits from a clearly identifiable and legible entry point which offers a formal point of entry as well as connectivity to the existing Lawson Clinic.

The purpose of the spaces within the facility are clearly identifiable and suitable for the needs of staff and patients.

15. Built Form

As indicated by the urban design consultant, the demolition of No. 742 Pacific Highway and extension of the building to the south is supported.

Concern is raised with regard to the presentation of the western facade of the building and their engagement with the adjoining residential dwellings to the west. In response, refer to the Renders prepared by Elevation Architecture (DA-05.10).

Figure 1 below demonstrates that the proposed development results in a suitable bulk and scale when compared to the existing St John's Op Shop building to the north, and consists of a suitable mix of architectural design elements to mitigate the visual impact of the development, including a stepped setback arrangement which includes the roof form, and a mix of vertical and horizontal elements of varying colours and finishes. Furthermore, it is noted that a mix of landscaping is proposed along this boundary which will provide further screening.



Figure 1: Extract of the Render plan DA-05.10 which demonstrates the proposed development as viewed from the west of the St John's Op Shop building.

Figure 2 below demonstrates the proposed development as viewed from the adjoining residential property to the west. This image depicts the sloping topography of the locality, and demonstrates that the design of the proposal provides a subtle mix of visual design elements which mitigate the impact of an imposing building form. This is achieved by providing a facade which avoids a 'walled' presentation, and instead provides an open style ground level, with varied articulation throughout, horizontal window forms and a simple roof line. These

elements achieve a design which breaks up the massing of the building form and focuses attention on the complementary mix of landscape screening.



Figure 2: Extract of the Render plan DA-05.10 which demonstrates the proposed development as viewed from the neighbouring residential property to the west of the proposed building.

16. Facade Composition

The amended proposal achieves an interesting composition of architectural features and articulation, provides increased setbacks, provides several outdoor deck areas, reinforces the main entry points to the buildings, and positively engages with the existing Lawson Clinic.

Detailed heritage design analysis with regard to the relationship between the proposal and the existing Lawson Clinic 'Windsor House' is provided in the attached Heritage Assessment prepared by NBRSPartners.

General Comments with regard to Urban Design

The amended proposal responds to the advice provided by Council and their urban design consultant and their preference to demolish that dwelling at No. 742 Pacific Highway. This has allowed the proposed building to be reconfigured to allow increased boundary setbacks. The siting of the building is at the north-western portion of the site in order to suit the existing contours of the site and create a strong connection with the existing Lawson Clinic both in terms of built form and paths of travel.

The ridge line of the Church Hall to the north is of a similar height to the second storey of our proposal, with the highest point being RL136.78 and the highest part of our roof only 1.32m above that. We have been advised that this hall has been earmarked for a future 4 storey development and therefore this proposal is in keeping with the future character when considered in light of the redevelopment of the adjoining northern property which is also zoned R4 High Density Development.

The proposed building is also sited at the portion of the site which requires the least excavation. Given the site slopes steeply at the southern portion of the site, it is considered appropriate to orientate the building away from the southern portion of the site which also benefits from minimal excavation. Furthermore, proposed car park and ground floor plane respects the natural fall of the site and offers the opportunity for integrated landscaping elements which better relate to the adjoining residential properties. The proposed layout

provides a highly functional inpatient unit with several outdoor areas which benefit access to morning and afternoon sunlight.

Council's correspondence dated 13 December 2013 also raised heritage considerations such as curtilage/alignments/entry, privacy concerns and view corridors to or from the site. The Statement of Heritage Impact prepared by NBRSP+Partners and dated July 2013 which accompanied the DA addressed these issues in detail. Further to this, the amended design provides an improved presentation of the curtilage to the heritage item, including reinforcing the landscaped setting. As further demonstrated in the attached photomontages (Drawing Number DA-05.11) as viewed from the public domain along the Pacific Highway, there are limited views and view corridors in which the proposed development will be visible, and therefore the heritage significance of the heritage item is not adversely affected. The proposal offers a single public entry point to the building with a direct connection to the existing Lawson Clinic, and has been designed with several privacy measures to protect the privacy and amenity of the neighbouring properties. The proposal allows for the heritage item to retain its heritage significance.

Public Submissions

The following table summarises the issues raised in the public submissions and provided a response to each: -

Table 2: Summary of Issues Raised in the Public Submissions and Response

Summary of Issues Raised	Response
The area is zoned High Density Residential as per Ku-ring-gai Local Environmental Plan (Local Centres) 2012. A hospital is not residential.	<p>The proposal is sought pursuant to SEPP (Infrastructure) 2007.</p> <p>It is noted that this facility provides a built form which effectively protects the amenity and privacy of neighbouring residential properties including landscape screening and high set windows which are unopenable with privacy screening devices. The proposal does not provide any openable windows or balconies as would be the case with an apartment building.</p> <p>The site is suitable for this form of development and use.</p>
<p>Building height and scale is too large and results in Heritage setbacks have not been adhered to.</p> <p>The proposal detracts from a Federation era building.</p>	<p>The proposed building height and scale is responsive to the sloping topography of the site and existing surrounding built forms. The proposal largely complies with the building height, with the exception of a minor portion of the roof form. The proposal provides a built form which directly relates to the existing heritage item. Refer to further discussion in Section 7 above.</p>
An unacceptable number of trees are being removed from the site.	<p>The proposed redevelopment seeks to provide a holistic built form with complementary landscaping elements throughout. Although a number of trees are being removed from the site, the proposal includes the provision of a mix of trees, shrubs and</p>

	planting to enhance the landscaped setting of the site.
Concerns regarding 24 hour use of the site and its location adjacent to a secondary girls school and the Pacific Highway.	<p>The operation of the proposed facility is accompanied by a draft Operational Management Plan. This plan assists in managing the safety and security of the site and surrounds, including a restriction on access afterhours for patients and visitors.</p> <p>The proposal is a community use which is compatible with the adjoining residential uses and school facilities, and benefits from a high level of accessibility due to its proximity to the Pacific Highway and public transport.</p>
Loss of privacy to 1 Bushlands Avenue, Gordon due to elevated height of rear ancillary office.	<p>The rear ancillary office is proposed to be demolished.</p> <p>The proposal seeks to provide an inpatient facility with a single proposed building form. As viewed from the south, the proposal provides minimal windows to this elevation which are unopenable with privacy screening to the deck areas to avoid overlooking of neighbouring properties. Substantial setbacks are provided to the southern boundary to mitigate potential visual impacts.</p>
<p>Safety compromised due to inadequate fencing separating 742 Pacific Highway from adjacent dwelling and poor pedestrian footpath planning due to long driveways.</p> <p>The driveways are mostly concealed with no clear vision.</p>	<p>The proposal includes boundary fencing with a height of 2m. A dedicated pedestrian pathway is located from the Pacific Highway along the northern boundary of the site. This pathway provides direct access to the existing Lawson Clinic building and the single public entrance to the proposed building.</p> <p>The proposal demonstrates a high level of safety throughout.</p> <p>The proposed driveways are accessible and will be appropriately identified by signage.</p>
Patients will not be properly treated due to noisy location adjacent to Pacific Highway.	The site is suitable for this form of use, and the facility is appropriately acoustically treated.
<p>Concern is raised with regard to traffic management in the Cecil and Henry Street area as all vehicular access to and from the development is proposed to be via Henry and Cecil Streets.</p> <p>In any normal school week, there are 4 groups of students, approximately 300 in each, which cross Cecil Street to access the Gordon Uniting Church, in addition to this, the students in Kindergarten to Year 2 cross the street daily to access their designated playground area. Henry St also acts as a drop off and pick up point for students.</p> <p>Over the past several years there has been one serious accident and a few "near-misses" due to the congestion on Cecil and</p>	<p>The School's concerns with regard to traffic impacts from the construction and ongoing operation of the development are noted.</p> <p>The proposal and accompanying Preliminary Construction Traffic Management Plan have provided careful consideration of the anticipated traffic routes and prioritise the safety of vehicles and pedestrians.</p>

Henry Streets. The school is committed to the safety of those within and associated with its community. Any construction vehicles which need to access the site will need to make their access via St John's Ave along Henry and Cecil Streets and into the above development via the Highway. This will severely impact the school and compromise safety.	
The proposal has inadequate onsite parking and non-existent street parking for visitors.	The proposal provides dedicated parking for staff, visitors and delivery services. Refer to the further detailed traffic assessment prepared by URaP – TTW which accompanies this submission for further explanation and justification.
Evening traffic on Pacific Highway heading north is at a standstill. This adds to the bottleneck as the three driveways are at the end of the merging outside feeder lane.	The proposal provides a main vehicular ingress and egress point at the centre of the site, which will be appropriately signposted. The secondary driveway is dedicated for the use of staff. The proposal provides a suitable driveway arrangement which is compatible with the development and Pacific Highway. Refer to the Traffic and Parking Assessment submitted with the DA and the attached Traffic Assessment, both prepared by URaP – TTW for further details and justification.
The proposal would directly overlook the back yard, front yard and swimming pool of 22 St John's Avenue.	The proposal provides minimal windows to the western elevation with high set feature windows which are unopenable. In order to ensure that views from these windows into the neighbouring properties are avoided, these windows all feature privacy screening and therefore there is no overlooking of neighbouring properties. The proposed setbacks also allow for landscape screening which contribute to the protection of the neighbour's visual privacy.
The land use must remain residential so as to meet Ku-ring-gai Council's metropolitan housing strategy targets.	Council's housing targets are capable of being achieved within Gordon and the greater LGA, the provision of a health facility on this site does not negatively impact on the overall housing targets.
This hospital is incompatible with the residential area and the shopping centre, train station, churches, school and children's playgroups.	<p>This site is suitable for this form of use, given it is an extension to the existing Lawson Clinic Facility and has access to Pacific Highway and public transport.</p> <p>The continued operation of this facility is professionally managed and provides an important community health benefit.</p> <p>As supported by SEPP (Infrastructure) 2007, this form of development is a significant health facility which is suitable for this site and compatible with its surrounding land uses.</p>
The proposal will create undue noise for neighbouring residential dwellings.	The proposal has been designed so as to avoid the creation of activity which would impose on the

	<p>acoustic privacy of neighbouring residents. This has been achieved by providing windows with raised window sills which are unopenable, and avoiding the placement of outdoor areas.</p> <p>In response to requests from Council and their urban design consultant, outdoor courtyard areas are provided, however appropriate privacy treatments are provided to these passive areas, and their use is restricted to 7am to 9pm.</p>
<p>Site is located on ground 2 metres higher than neighbouring dwellings, council should recognise this. The proposal does not show building envelopes or overshadowing in diagrams, and shows multiple levels of overlooking balconies that will compromise privacy.</p>	<p>Please refer to the attached architectural drawings which also include photomontage / 3D modelling images as viewed from within the site and neighbouring properties. The extent of additional overshadowing generated by the development is also demonstrated on the attached Sun Shading Diagrams. Refer to further discussion at Section 1 above.</p> <p>The proposal recognises the sloping topography of the site and surround, and provides a built form which is articulated and complemented by landscaping to achieve a compatible development outcome.</p>
<p>The proposal may provide smoking areas, endangering the health of neighbouring residents.</p>	<p>The site is a non-smoking facility.</p>

We trust that the above advice is sufficient to complete your assessment of the amended design. If you require any further clarification of details with regard to the above items, please do not hesitate to contact me on 8270 3500.

Yours Sincerely,



Susan E Francis
Executive Director
City Plan Strategy and Development Pty Ltd