



18 November 2020

Pathways Property Group Pty Ltd
Attn: Elyse Kenny
Suite 6.02, 120 Sussex Street
SYDNEY NSW 2000

cc: elysek@cityplan.com.au

Dear Ms. Kenny,

**DA NO
ADDRESS
PROPOSAL**

DA 113/2020
4-18 Northwood Road & 274-274A Longueville Road, Lane Cove
Construction of a mixed-use development including a 143-bed
residential aged care facility and commercial premises including a
medical centre premises, and basement parking

RE: UNSATISFACTORY DEVELOPMENT PROPOSAL

I refer to your development application and advise that a preliminary assessment has been undertaken. It raises a number of issues and the development application is considered to be unsatisfactory in the following manner:

1) Built form

The development, as proposed, is not supported at this stage until the following issues regarding built form are addressed through the submission of amended plans:

Setbacks

- A 3m setback is to be provided along the Northwood Road frontage. The ground floor lobby and entrance are setback 2m. The 3m setback requirement is to be adhered to. Planting in this area is encouraged.
- The third level is to be setback 5m in accordance with the DCP amendment, adopted 16/11/20. The proposed nil setback for the upper level would not respect the prevailing and desired future streetscape character of the neighbourhood centre and is not supported.
- Refer comments below regarding 10m bushland buffer zone.

Building Height

- As the proposal is for infill development, non-compliance with the height of buildings development standard, as per the LCLEP 2009 definition, is considered to be unreasonable and unnecessary. As such, the applicant is strongly encouraged to amend the proposal to comply with the standard.



- Note: The required 5m setback of the upper level from Northwood Road may trigger design modifications that may remove, or as a minimum reduce the extent of, non-compliance.
- A maximum of 5-storeys is to be proposed at the rear, as per the DCP amendment.

2) Traffic

Council's Traffic Engineer has reviewed the application and recommends that the development not be supported at this stage until the following issues are addressed through the submission of amended plans:

Accessible parking

- One of the proposed accessible parking spaces does not comply with AS2890.6. The three (3) accessible parking spaces shall all comply.
- The accessible parking spaces are required to be located as close to the lift as possible.
- Access in/out of spaces 18 and 19 require vehicles to reverse onto the circular ramp with limited visibility. As such, these spaces are to be deleted.

Driveway

- The driveway is to be designed as a left-in and left-out only. The design should prevent right-turn movements by installing a triangular median island at the entry/exit of the driveway. Details of the driveway showing this restriction is to be provided.

Ground clearance

- AutoCAD files of the ground clearance test is to be provided for a B99 and MRV as the plan provided is unclear.

Traffic generation / analysis

- A Safety and Functionality Report is required for the proposed traffic signal outlining the potential wait times/queue lengths and location of the loops.
- The use of traffic counts to determine the traffic generation of the existing development (as oppose to rates from the RMS guide) would be an accurate representation of existing conditions and therefore the net increase in traffic volumes. Passing trade of 80% should be applied to the service station and convenience store component of the existing development.
- The traffic report must consider the following future upgrade projects:
 1. River Road/Longueville Road upgrade – Modelling is required to be updated as per the TCS provided.
 2. Impact on local streets - The Traffic Report does not provide a detailed assessment on the impact of local streets such as Arabella Street/Woodford Street/Kenneth Street. Given the left in left out arrangement, it is noted that 30% and 60% of traffic

entering the development in the AM and PM peak hours respectively will be coming from the east via River Road. These vehicles are expected to use Arabella, Woodford and Kenneth Streets. The Consultant is to provide a SIDRA analysis at the above intersections to determine the impact of the additional traffic on these local streets.

3. Northwood Roundabout – Council is the process of gaining approval for a roundabout at the Northwood Road/River Road intersection. Given the development is restricted to left in/left out access, the proposed roundabout will facilitate westbound movements from the development which will potentially reduce rat-running through local streets. As such, the developer is required to contribute funding towards the construction of the proposed roundabout.

Height clearance

- The height clearance proposed is not in accordance with AS2890.2. Ramp sections are to be provided indicating the height clearance for the largest design vehicles accessing the development.
- AutoCAD files of the ground clearance test is to be provided for a B99 and MRV as the plan provided is unclear.

Bicycle parking

- A shortfall of 10 spaces (54 required, 44 proposed) is proposed for the commercial component. This is to be addressed.

3) Bushland

- The 10m bushland buffer on the side boundaries that are adjacent to E2 zone have not been adhered to (Part H of LCDCP 2010). The property adjoins E2 Environmental Conservation Bushland to the East. A 10m bushland buffer is to be applied to any boundary that adjoins E2 Bushland i.e. rear and side boundaries. At present, the south-eastern corner provides only a 6m and 2.75m buffer. This is not supported.
- Further independent studies and evidence is required to support the claim in the revised *Flora and Fauna Assessment Report*, prepared by Cumberland Ecology, that the proposed setback to adjoining E2 zoned land *would be unlikely to have a significant impact on the long-term survival of any threatened species and/or ecological communities occurring, or that have the potential to occur within the subject site or locality.*
- Although the tree replacement strategy of 1:3 removal to replacement ratio is satisfactory there is only 6 canopy trees proposed to be replaced. I would encourage a minimum of 20 canopy trees to be replaced.
- The removal of native turpentine trees 1, 2, 5, 6, 10 and 11 is not supported as they act as canopy trees that provide habitat and are a food source for native fauna. They also provide shade reducing heat island effects in urban areas.

4) Stormwater

- A meeting was held with Council and ACOR on 07/10/20 to resolve the issue of stormwater management on the site. No resolution was met. Three (3) options were proposed, as follows:
 1. pipe stormwater to Northwood Road;
 2. pipe stormwater through the bush to the golf course; and
 3. continual slow release of stormwater into bushland.

Council is currently awaiting further information for the management of stormwater.

- Consideration shall be given to the DCP amendment adopted by Council on 16/11/20, which seeks to direct stormwater to the front of the site. Council is willing to discuss alternative solutions, which would satisfy the objective to protect the bushland, without necessarily mandating that all stormwater is directed to the site frontage.
- The applicant is to liaise further with Council's Engineer/Bushland Manager to resolve this issue.

5) Landscaping

- Council's Landscape Officer has reviewed the revised landscape plans, dated 14/10/2020, and determined that further information is required on the construction of the retaining wall proposed in 'Section and Elevation 1'. Currently the wall is shown at 3m higher than the basement level and would be retaining a high volume of soil. Construction details of the retaining wall are required to demonstrate the measurements of the wall, material, and wall type.
- The removal of Trees 1, 2, 5, 6, 7, 10 and 11 is not supported on landscaping grounds.
- As per the DCP amendment, adequate soil depth is to be provided along the side and rear boundaries to permit tree planting.

6) Draft DCP

- The SEE is to be updated to address the Draft amendments adopted by Council 16/11/20.
- The proposal is to ensure consistency with the DCP amendment to *Part D: Commercial Development and Mixed-Use Localities - Locality 2: Northwood Neighbourhood Centre* of LCDCP 2010.

7) Telecommunications tower

- Written evidence from the relevant telecommunications tower shall be provided regarding removal/relocation of the tower.

8) Additional Comments from the Sydney Eastern City Planning Panel

The following additional information, as per the Sydney North Planning Panel briefing on 18/11/2020 (not addressed previously), is to be provided:

- A revised traffic analysis to address the cumulative impact of approved/pending developments in the vicinity of the site including the proposed development at 266 Longueville Road.



- Confirmation of accuracy of height plane diagram included as part of Clause 4.6 written request.
- Confirmation on how it is intended to deal with the telecommunications tower.
- An updated photomontage / model is to be prepared for the proposal as amended by the design changes required above.

9) Timeframe for Submission of a Response to Council

You are requested to respond to these issues within **fourteen (14) days** of the date of this letter.

If this does not occur within fourteen (14) days of the date of this letter, your application may be refused.

If you have any enquiries, please contact our Consultant Assessment Officer, Ms P Frecklington, on 0418 451 822 or by email at sydneyplanning@hotmail.com between 9.00am and 5.00pm Monday to Friday.

Yours sincerely,

A handwritten signature in black ink, appearing to read "P. Frecklington", is positioned below the "Yours sincerely," text.

Ms P Frecklington
Consultant Assessment Officer