



12 November 2025

Lane Cove Council
48 Longueville Road
LANE COVE NSW 2066

Attention: Chris Shortt – Senior Town Planner

28 - 42 PACIFIC HIGHWAY, ST LEONARDS (LOT 1 DP 746012, LOT A AND LOT B DP 418201 AND LOT D 419240)

DEVELOPMENT APPLICATION NO: DA 97/2025 (PAN-563091)

RESPONSE TO LANE COVE COUNCIL REQUESTS FOR ADDITIONAL INFORMATION

Dear Chris,

1. Response to Request for Information

Paro Consulting write in response to the request for additional information (RFI) dated 15 October 2025 prepared by Lane Cove Council (Council) in relation to the Development Application (DA) No. 97/2025 for the *“Demolition of existing structures and the construction of a mixed-use, hotel development comprising commercial tenancies, 99 hotel units, communal living and communal outdoor areas, basement parking and facilities and associated works”* (the Proposal) at 28 - 42 Pacific Highway, St Leonards (the Site).

Furthermore, after the initial RFI Council advised the following additional items requiring response:

- WaterNSW – Request for Further Information (dated 30 September 2025),
- Transport for NSW (concurrence) referral response (dated 21 October 2025),
- Public Objections to the DA requiring response from the Applicant.

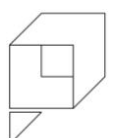
A response to the letter received and the above items in relation to the DA is provided below

2. Response to Requests for Information

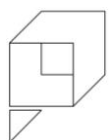
A response is provided in the table below to the requests for information received in relation to the DA.

Table 1. Response to Request for Information

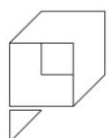
Item	Response
Lane Cove Council – Request for Additional Information	



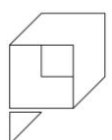
Item	Response
<i>This letter is to advise that a preliminary review of the application has been undertaken and to outline a request for further information under Clause 54 of the Environmental Planning and Assessment Regulations 2000.</i>	
1. Engineering	
<i>Councils' stormwater engineer requires the stormwater management plan to be amended. A new pipe system is required to be installed into Marshall Lane as per the red annotations on the attached plan in Attachment 'A'. The amended stormwater management documentation should include an updated Lower Ground Floor Plan, a longitudinal section and associated calculations.</i> <i>For further advice please contact Maran Muthiah mmuthiah@lanecove.nsw.gov.au</i>	An updated Stormwater Management Plan and supporting details is being prepared in response to this requested amendment and shall be provided to Council as soon as available likely within the next week.
2. Waste <i>Council's waste officer has undertaken a preliminary assessment and requests the following points to be clarified and updated on the plans.</i>	
<i>The waste management plan (WMP) references 1100L bins. For future proofing, (if the use changed from hotel to residential), please provide a recalculation based on 660L bins which is Council's contractor bin size standard.</i> <i>A minimum of 4 storeys must be provided with a chute system</i> <i>A minimum of 21 units must have a minimum 30m3 bulky waste room</i>	An Amended Waste Management Plan (WMP) dated 7 November 2025 (Ver 1.1) has been prepared to address the specific operational needs of the proposed hotel use, including bin sizing, collection frequency and storage capacity consistent with the intended use and waste generation rates. Revisions to accommodate hypothetical future use scenarios (such as residential accommodation conversion, which is a prohibited use in the land use zone) fall outside the scope of assessment and are not a requirement under Council's DCP or relevant planning controls. Should a future change of use be proposed, an updated WMP would be submitted at that time in accordance with Council's standards applicable to the new use.
<i>No loading zone for waste vehicles is indicated on the plans. Please include on amended plans.</i> <i>The waste storage room does not indicate the number of bins or storage areas. Please indicate on the plans.</i> <i>The WMP is required to confirm that Council will not collect waste associated with the boarding house / guest house portion of the development. Please update the WMP.</i>	The waste management plan has been amended to reflect the 'Hotel' use and address requirements of waste collection and bin movement details / procedures.



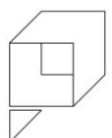
Item	Response
<i>The WMP does not include details of the movement of bins to the collection point. Please update the WMP.</i>	
<i>Part Q of the Lane Cove DCP requires all bins to be collected onsite, the number of bins outlined in WMP to be collected kerbside raises traffic issues in Marshall Lane. It also and raises safety/amenity concerns for transporting bins from storage area to collection zone.</i> <i>The Traffic Management Plan must include swept paths for waste collection vehicles.</i>	The Applicant acknowledges Council's requirement under Part Q of the Lane Cove DCP for on-site waste collection. However, following a review of the site's configuration and the interface with Marshall Lane, on-site collection is not feasible without resulting in a significantly poorer urban design and activation outcome. It is noted the current bin storage and collection arrangement was supported by Council at the preliminary DA meeting. The advice provided in the waste referral is contradictory to the advice provided in the Council meeting. To enable on-site servicing, the design would need to accommodate Heavy Rigid Vehicle (HRV) access into the basement. This would require substantial design changes including loss of active interface at ground level. It is noted the Design Panel identified the activation of the laneway a contributing factor to design excellence and requested this be increased and its removal would be contradictory to the Design Panels position. Accordingly, the proposal adopts on-street collection from Marshall Lane as the most practical and balanced approach. This method maintains an active frontage and a high-quality pedestrian environment. It should be noted waste collection only occurs for a 15-minute period once a week, soon after waste collection the bins will be relocated to the basement. Further, all the other development to the service laneway includes waste collection from the service laneway.
3. Traffic and Transport	
<i>The SEPP Amendment encourages minimised provision of parking for all land uses to capitalise on the proximity of St Leonards Station and the Crows Nest Metro Station, however Council's DCP still apply and must be referred to.</i> <i>Loading and servicing facilities are to be provided according to Council DCP.</i>	The Applicant acknowledges Council's comments regarding car parking supply and notes that the proposed parking provision has been formulated in accordance with the intent and compliance of the Crows Nest Transport Oriented Development Precinct (TOD) and associated Design Guideline which encourages reduced private vehicle dependency in highly accessible, transit-oriented centres.
<i>The applicant is requested to provide additional information.</i>	



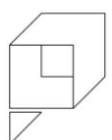
Item	Response
1. Council does not support this level of reduced car parking at this stage. Is applicant to provide greater levels of car parking rates. Is applicant able to provide reference to similar existing hotels as per NSW Guide to Transport Impact Assessment. Applicant to confirm allocation of 23 car parking spaces towards visitors/customers or employees.	The site benefits from its immediate proximity to St Leonards Station and the Crows Nest Metro Station, both within walking distance, as well as frequent bus services along the Pacific Highway. Accordingly, the proposed reduced car parking provision represents a sustainable transport outcome consistent with State policy objectives for mode-shift away from private vehicle use. The reduced parking provision of the TOD prevails over the Lane Cove DCP.
2. As per Council DCP, Tourist coach set-down and parking provisions must be addressed. Provision for tourist coach parking should take into account available off-site coach parking. Where practicable and subject to urban design considerations, loading and unloading of passengers and baggage is to be accommodated within the development site. It is suggested that an adequate coach lay by be incorporated at the hotel entrance and on-site coach parking be provided. A minimum of two spaces is recommended.	The Applicant acknowledges Council's requirement for tourist coach set-down and parking provisions under the Lane Cove DCP. Due to the spatial and topographical constraints of the site, and the objective to maintain a high-quality active frontage and pedestrian environment along both Pacific Highway and Marshall Lane, the provision of on-site coach parking within the development footprint is not feasible without significantly compromising building design, public domain activation, and traffic safety outcomes. The Applicant notes that existing set-down and bus/coach drop-off zones already operate in proximity to the site. These existing public domain facilities provide suitable opportunities for short-term passenger and coach movements associated with the proposed hotel. A larger-scale context plan can be prepared to illustrate the location of these existing set-down and coach drop-off zones relative to the site, confirming that the development can be effectively serviced without the need for additional on-site coach parking areas.
3. Taxi facilities should be provided. The relationship of 1 taxi trip per hour per 10 hotel rooms as per RTA Guide to traffic generating developments indicates the provision of taxi pick up and drop off facilities.	The Applicant acknowledges Council's reference to the RTA Guide to Traffic Generating Developments and the indicative rate of one taxi trip per hour per ten hotel rooms. It is noted, however, that the proposed hotel operates within a highly accessible urban context with direct frontage to the Pacific Highway and close proximity to existing public transport services. In this context, the anticipated taxi demand can be comfortably accommodated within the existing kerbside environment.



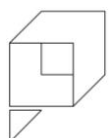
Item	Response
	without the need for a dedicated on-site taxi bay, which would otherwise compromise the aim of activating the laneway.
4. <i>Electric vehicle infrastructure: The proposed plans do not show the location of the EV charging infrastructure as per Council DCP.</i>	The Applicant submits that this can be dealt with via a condition of approval should it be deemed required.
5. <i>Traffic signals in ramp are acceptable, however applicant will need to determine the amount of vehicle storage required so as queue lengths will not extend beyond the property boundary. Queue lengths shall be calculated by applying conventional queuing theory to estimated mean arrival rates during normal peak periods, and mean service rates under continuous demand, determined as closely as possible from observing the operation of similar facilities. The storage area shall be designed to accommodate the 98th percentile queue under such conditions. As per clause 3.5 (AS/NZS 2890.1 2004).</i>	The Applicant acknowledges Council's acceptance of the proposed traffic signal system at the basement ramp and notes the requirement to demonstrate adequate vehicle queuing and storage capacity in accordance with Clause 3.5 of AS/NZS 2890.1:2004. A detailed traffic engineering report confirming compliance with AS/NZS 2890.1:2004 and Council's requirements can be submitted and verified as part of the Construction Certificate documentation to Council's satisfaction.
6. <i>10% or a minimum of 4, of all car-share spaces and spaces allocated to visitors must have a Minimum Level 2 40A charger, to be provided prior to Occupation Certificate. For this development a minimum of 4 applies, depending on how many parking spaces are allocated to visitors. As per Council DCP</i>	The Applicant submits that this can be dealt with via a condition of approval.
7. <i>All new developments are to meet the relevant Deemed-to-Satisfy Provisions of the National Construction Code or any subsequent amendment, except where varied by this clause. As per Council DCP.</i>	The Applicant submits that this can be dealt with via a condition of approval.
8. <i>10% of bicycle parking must be provided with 10A General Power Outlets (GPO). As per Council DCP.</i>	The Applicant submits that this can be dealt with via a condition of approval.
9. <i>The applicant must provide evidence at DA stage that commercial car share operators have been engaged and are committed to supplying car share vehicles in all of the designated on-site car share spaces. As per Council DCP.</i>	The Applicant submits that this can be dealt with via a condition of approval.
10. <i>A CTMP must give consideration to the following traffic issues:</i>	The Applicant submits that this can be dealt with via a condition of approval requiring the preparation and approval of a CTMP to Councils requirements for implementation prior to



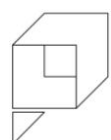
Item	Response
• <i>The proposed method of access to and egress from the site for construction vehicles</i> • <i>Disruption to traffic flows</i> • <i>Preferred construction access</i> • <i>Vehicles leaving the construction site in a forward direction</i> • <i>Through traffic is to be maintained at all times</i> • <i>Maintain access to all neighbouring properties at all times</i> • <i>Proposed method of traffic control; controllers must be qualified</i> • <i>Proposed method of pedestrian management</i> • <i>Access routes through the Council area</i> • <i>Method of loading and unloading materials and equipment</i> • <i>Location of any cranes</i> • <i>Location of any Work Zones (approval of the CTMP does not imply that the proposed Work Zone will be approved, that is still subject to Traffic Committee approval)</i> • <i>Temporary, full or partial road closures</i> • <i>Information to local residents and advertising as required</i> • <i>Method of demolition and construction</i> • <i>Areas used for storage of demolition materials, construction materials and waste containers</i> • <i>Method/device to remove loose material from all vehicles and/or machinery</i> • <i>Method of support to any adjoining properties</i> • <i>Protection for Council and adjoining properties</i> • <i>Other site-specific considerations (as applicable)</i> • <i>Safe Work Method Statement, Truck vehicle swept paths, Truck volumes.</i>	commencement of demolition and construction when builder is appointed.
11. Section 3.3 – Applicant is proposing waste collection to occur at rear of site in Marshall Lane. Vehicle swept paths are required to show the maximum design vehicle proposed and must be able to be contained within site boundaries.	Not required. Waste collection is proposed to the service laneway.

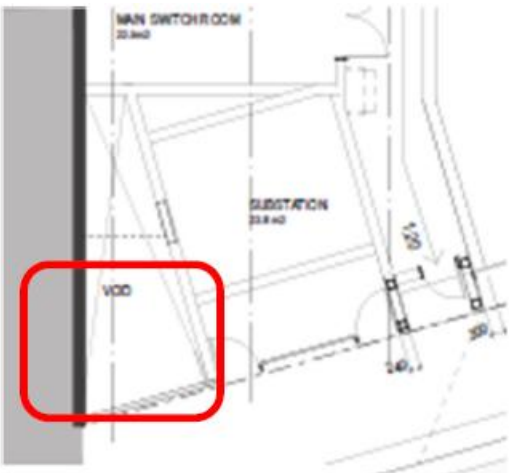


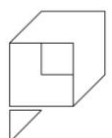
Item	Response
12. Section 6.2 – Category 1 access driveway should be 5.5m maximum width. Applicant has proposed 6.077m.	A maximum 5.5m width plus kerbs is proposed in compliance with code.
13. Section 6.2 – Straight ramps for public car parks up to 20m in length shall be 1 in 5 (20%) maximum. Longer than 20m shall be 1 in 6 (16.7%) maximum. Applicant has proposed 25%.	The Applicant submits that the ramp is compliant with relevant code as measured from the inside of the curved ramp.
14. A traffic report demonstrating the safety and functionality of the basement car park including details of the proposed signalised system to be provided and approved by Council's traffic section before the issue of the construction certificate.	Acknowledged. The Applicant submits that this can be dealt with via a condition of approval.
15. Recommendation to install wheel stops at car parking spaces 20-23 to ensure pedestrian pathway width is maintained.	Acknowledged. The Applicant submits that this can be dealt with via a condition of approval requiring the installation of wheel stops.
16. Sustainable Travel and Access Plan (STrAP) to be developed and approved by Council traffic section prior to Occupation Certificate.	Acknowledged. The Applicant submits that this can be dealt with via a condition of approval requiring the preparation and approval of a STrAP to Council's requirements for implementation prior to issuing of Occupation Certificate.
4. Trees	
The proposal includes removal of 1 tree in the Marshall Lane frontage, demolition of existing structures and the construction of a Mixed-Use, Hotel development comprising: commercial tenancy, 99 motel units, communal living and communal outdoor. It is noted that the NSROC Design Review Panel have raised the lack of street tree planting within the Pacific Highway and Marshall Lane frontages and encouraged collaboration with Council to establish a strategy for tree planting along with footpath upgrades. This has not been adequately addressed. The removal of 1 x Jacaranda mimosifolia from the rear of the subject site along the Marshall Lane frontage is supported due to poor form and structure. Replanting on a 1:1 basis in accordance with Sections 3.6 Canopy Cover, Provisions - a) iii and 3.7.2 Tree Planting Requirements, Provisions - b) – d) and Table	The Applicant is supportive of collaborating with Council to review any future public domain or street tree planting proposals along the Pacific Highway and Marshall Lane frontages. However, it is noted that the areas identified for new tree planting are located outside the site boundary and therefore fall within the road reserve. Replanting within these areas is not feasible for the Applicant due to the location of a new substation and associated service infrastructure, which limits available clearance and soil depth. Accordingly, the Applicant requests that Council consider tree planting opportunities within the public domain as part of its broader street upgrade program. The Applicant remains willing to coordinate with Council and is prepared to undertake a detailed feasibility investigation as part of a post-consent Section 138 Approval process to Council's requirements. This process would include consultation with relevant service authorities,



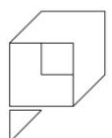
Item	Response
<i>1.4 of the LCC DCP 2009 - Part J – Landscaping and Tree Preservation is required within the Marshall Lane frontage.</i> <i>The Pacific Highway Street tree planting should consider the use of 2 - 3 x 75Ltr Tristaniopsis laurina ‘Luscious’ planted in strata cell or similar product in accordance with establishing the soil volume specified for a small tree in Table 1.4 of Section 3.7.2 Tree Planting Requirements of the LCC DCP 2009 - Part J – Landscaping and Tree Preservation.</i>	confirmation of underground utilities, and any necessary potholing or hand trenching to verify conditions within the setback area. The outcomes of this investigation would inform the final landscape and public domain design for the Pacific Highway frontage to ensure any proposed planting is feasible and consistent with service authority clearances and Council’s public domain plan objectives.
5. Landscaping <i>The applicant is requested to provide additional information.</i>	
Pacific Highway Frontage <i>As per 4.2.5 in NSROC DRP Minutes 28/05/25, Council seeks to understand feasibility for tree planting along the pacific highway frontage. The applicant is to conduct a feasibility investigation including an initial survey and BYDA of all underground utilities (including depths) within the area bound by the lot boundary and existing Pacific Highway kerb line, and subsequent written advice by any utility provider on the status of the service.</i> <i>Potholing, hand trenching and road opening shall need to be completed by the applicant to ensure all services found and letters of permission to install trees within the street setback area acquired from each service provider.</i>	The Applicant acknowledges Council’s request, as noted in Item 4.2.5 of the NSROC DRP Minutes dated 28 May 2025, to investigate the feasibility of tree planting along the Pacific Highway frontage. In response, the Applicant is prepared to undertake a detailed feasibility investigation as part of a post-consent public domain plan and Section 138 Approval process to Council’s requirements. This process would include consultation with relevant service authorities, confirmation of underground utilities, and any necessary potholing or hand trenching to verify conditions within the setback area. The outcomes of this investigation would inform the final landscape and public domain design for the Pacific Highway frontage to ensure any proposed planting is feasible and consistent with service authority clearances and Council’s public domain plan objectives.
Marshall Lane - Retail Access <i>Council requires more information regarding pedestrian access into the LG retail space from Marshall Lane. Council does not support pedestrian access currently via trafficable lane, no footpath is shown in the plan provided. Applicant to consider paving/shared-way improvement to Marshall Lane.</i>	The Applicant acknowledges Council’s concern regarding pedestrian safety and access to the lower ground (LG) retail tenancy from Marshall Lane. It is noted that Marshall Lane presently functions as a trafficable service lane with limited pedestrian infrastructure. The submitted plans did not indicate a dedicated pedestrian footpath due to existing site constraints and the current lane configuration. In response to Council’s comments, the Applicant is prepared to investigate opportunities to enhance pedestrian access, safety and legibility, in collaboration with Council noting that these

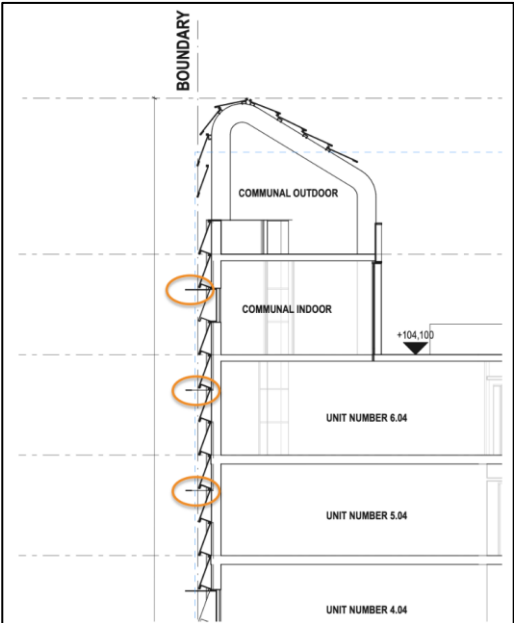


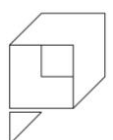
Item	Response
	works would be within the public domain adjoining the site outside the boundaries of the subject site.
Marshall Lane – Void / Potential Deep Soil Ground Planting Zone <i>The applicant shall provide a tree (Livistona australis - min 6m H) in ground garden bed in the setback along Marshall Lane adjacent to the proposed void and substation. Applicant to consider and advise suitability of on structure planting bed in the proposed void at the same level.</i> 	The void is required for air supply to plantroom below.
Marshall Lane – Paving / Frontage <i>Please advise paving treatment to lower ground setback and transition to Marshall Lane. The Marshall Lane render (Architectural Drawing A-901) appears to be a misrepresentation of the frontage, inconsistent with the lower ground floor plans – the render shows a footpath and existing tree retained.</i>	This is correct. We can amend the perspective, if required. No pavement within boundary.
Upper Levels – Planter Boxes <i>The applicant shall ensure soil volumes are consistent with LCC DCP Part J 3.7.3, Table 1.5 - noting min area requirements for robust plant health. Consolidate planters where required / provide dimensions for assessment.</i>	The Applicant's intention is to fully comply with the soil volume requirements of the Lane Cove DCP. It is noted, however, that consolidating planters into larger units can create waterproofing and structural movement issues, particularly on the upper levels of the building. The current design approach using smaller, individual planters provides greater long-term durability and maintenance efficiency while still allowing compliance with the required soil volumes.
Irrigation	Noted.



Item	Response
<i>Council notes irrigation section in the landscape documentation as acceptable. Council requires an automatic drip line irrigation system be installed for all planter boxes proposed.</i>	
WaterNSW – Request for further Information	
<i>WaterNSW has reviewed the information provided with the development application related to water supply works.</i> <i>WaterNSW requests that the consent authority stop-the-clock for this development and arrange for the applicant Edsgear Pty Limited to provide the following information to enable assessment of the application:</i>	
1. <i>Confirmation of the proposed basement construction design, being either tanked (fully watertight) or drained (requiring permanent ongoing dewatering).</i>	Basement construction design is to be fully tanked.
2. <i>If a tanked basement design is proposed, the following information is requested.</i> <i>(i) Volume of water to be extracted annually if available.</i> <i>(ii) Duration of the water take for dewatering if available.</i> <i>(iii) Method of measuring the water take and recording.</i>	An Addendum Geotechnical Letter of Advice is being prepared in response to this requested amendment and shall be provided to Council as soon as available likely within the next week.
3. <i>If a drained basement design is proposed, WaterNSW and the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) will require additional modelled data to support a hydrogeological review and assessment. The Geotechnical report (or equivalent) will need to be updated accordingly and satisfy requirements detailed in the Minimum requirements for building site groundwater investigations and reporting. Further information can also be found at https://www.industry.nsw.gov.au/water/science/groundwater/aquifer-interference-activities.</i>	N/A – Basement construction design is to be fully tanked.
Transport for NSW (concurrence) – referral response	
<i>TfNSW has reviewed the submitted information and notes that proposed louvres on the development's Pacific Highway facade may be overhanging the road reserve. While the submitted 'Eastern Elevation' plan (Drawing no. A202 Rev 01 dated 2 April 2025) indicates the louvres are contained within the property boundary, the 'Sections Plan – 1' (Drawing no. A300 Rev 01 dated 1 August 2025) indicates some components would</i>	The applicant acknowledges the comments from Transport for NSW regarding the potential encroachment of the proposed louvres on the Pacific Highway façade. The Applicant has been in discussion with Jim Tsirimiagos (TfNSW Land Use Planner, Land Use Assessment – Eastern



Item	Response
<i>encroach into the road reserve. In this regard, TfNSW does not support any new buildings or structures (other than pedestrian footpath awnings) being located in/overhanging the road reserve of Pacific Highway (unlimited in height or depth) and would not issue concurrence under section 138 of the Roads Act 1993 to these structures. The plans should be amended to rectify this and ensure these components are located within the freehold property boundary, to the satisfaction of Council as the relevant planning authority.</i>	Transport Planning) and aiming to have a formal direction on this matter in-line with the commentary below. It is clarified that the elements referred to as 'louvres' are in fact minor light-weight horizontal awnings designed to provide weather protection and architectural articulation to the building façade. These are not structural building elements or enclosed projections. If the blades were required to be deleted, this would increase the reliance of mechanical cooling and reduce the environmental performance of the building. The louvered façade is wholly contained within the property boundaries - refer to below:  The minor protrusions are comparable to footpath awnings, which are a permissible and typical streetscape feature along the Pacific Highway (including the existing footpath awnings that currently exist along the frontage of the site) and supported by TfNSW in similar urban contexts. Furthermore, volumetrically there will be less projections into the SP2 zoned land as a result of the proposed hotel than the existing condition given the removal of the existing awnings – refer to



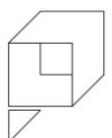
Item	Response
	below:  Requiring these architectural elements to be set back would necessitate a 450mm setback of the entire façade, which would in turn: • Compromise the design integrity of the building, • Create an incongruous streetscape outcome once adjoining developments are constructed to the boundary, and • Diminish the intended weather protection and passive design benefits of the awnings. Accordingly, it is respectfully requested that TfNSW reconsider its position, noting that the proposed awnings do not result in any material obstruction or structural occupation of the road reserve and would not prejudice road safety or future infrastructure along the Pacific Highway frontage.

4. Response to Public Submissions

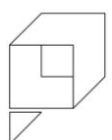
At the time of writing a total of five (5) public submissions were received objecting to the subject DA. To assist Council in their assessment, a summary of key issues and response to the public submissions received in relation to the DA is provided in the Table below.

Table 2. Response to key issues raised in public submissions

Issues	Response
1. Overshadowing and Loss of Solar Access • Shadow diagrams only illustrate horizontal spread and fail to depict the effect on vertical elevations of adjoining buildings (particularly 15 Marshall Ave).	As per the Shadow Diagrams submitted with this DA, which includes both horizontal and vertical (sun-eye diagrams) it is evident that most additional shadows cast are as result of a permissible building envelope. The proposal provides a site-specific response by positioning the majority of the building bulk towards the northern side of the site with



Issues	Response
- Significant reduction in northern sunlight to habitable rooms and balconies. - Lack of accurate elevation shadow studies prevents proper impact assessment.	a cascade down towards the southern boundary minimising solar impact to neighbouring residential properties. The TOD does not specify a 32° sloping height plane control. Instead, it includes objectives for solar access that override the Lane Cove DCP's Figure 14: Section AA of Block A. The proposal has elected to maintain a stepped form down to the Marshall Lane side of the building to preserve solar access to Southern neighbours. While the lift overrun sits above the notional 32° plane, the overall building adopts a stepped form to the south, specifically to preserve amenity for neighbouring properties. Solar analysis submitted with the DA confirms compliance with relevant solar access benchmarks.
2. Exceedance of Building Height Control - Proposed building, rooftop plant and screening exceed the LEP height standard by approximately 2-2.5 storeys. - Resultant bulk and scale cause additional overshadowing and visual dominance. - Concern that approval would create a precedent across the block.	The proposal is supported by a detailed Clause 4.6 variation request addressing the objectives of the height standard and it is demonstrated that the proposed variation to the height standard is acceptable and that strict compliance with the standard is unreasonable and unnecessary, in the circumstances of the case with adequate environmental grounds justifying the variation. The height exceedance results solely from the interpretation of “ground level (existing)” and the presence of existing basement levels having altered the ground level on site. The building height is compatible with the evolving character of the Crows Nest Transit-Oriented Development Precinct and aligns with the intended urban form under the Lane Cove LEP 2009 and Crows Nest TOD Design Guide.
3. Misrepresentation of Use / Function - The development is described as a “hotel” or “motel” but lacks key hotel components such as a reception, lobby, or back-of-house service areas. - All rooms contain kitchens and some multiple bedrooms, resembling serviced apartments or a boarding house. - Provision of 50 bicycle spaces is unrealistic for hotel guests and highlights operational inconsistencies.	The proposal is for a mixed-use, Hotel development including ground level commercial (retail) to both frontages and hotel accommodation.
4. Streetscape and Character Impact	The St Leonards centre is generally characterised by a range of built forms reflecting a mix of building types and scale with no specific



Issues	Response
- Demolition of existing terrace-style retail shopfronts along Pacific Highway will permanently remove fine-grain, traditional character and human-scale frontage that contribute to the visual identity of St Leonards. - Replacement built form is monolithic and inconsistent with the established streetscape rhythm.	period reflected in the built form. The immediate locality along Pacific Highway comprises a mix of subpar commercial development of various forms and densities. Despite this, with its placement in the Crows Nest TOD Precinct, the immediate area can be described as expected to experience rapid urban renewal, with high-rise mixed-use developments replacing older structures and increasing overall density. The proposed development is consistent with the vision of the precinct and the building will make a positive contribution to the character of Pacific Highway and Marshall Lane through its effective built form, sympathetic design materials and compatibility with emerging development.
5. Inadequate Supporting Documentation Key plans, including the Shadow Diagrams, are incomplete or unclear.	Solar Diagrams submitted with the DA includes both horizontal and vertical (sun-eye diagrams).
6. Amenity and Environmental Impacts - Extended overshadowing will lead to lower residential amenity for neighbouring apartments, increased winter heating costs, and reduced property values. - Loss of sunlight also affects outdoor living areas and overall neighbourhood quality.	The proposal has elected to maintain a stepped form down to the Marshall Lane side of the building to preserve solar access to Southern neighbours. The design maintains an appropriate transition to the adjoining residential properties and achieves acceptable levels of amenity consistent with relevant planning controls.

5. Conclusion

The letter provides a response to the concerns raised by Council and public submissions and provides amended plans and documentation for consideration.

We trust the contents of this letter satisfactorily address the items raised by Council. We also trust it will assist Council in finalising their assessment of the DA as early as may be possible. Please do not hesitate to contact me on 0422 983 710 or daniel@paroconsulting.com.au should you have any further queries.

Yours sincerely,



Daniel Barber, Planning Director

B.Plan (Hons), M.ProDev, RPIA REAP

