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**Contact:** Peggy Wong

**Ref:** SSD-78775458

21 May 2025

Department of Planning Housing and Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

Via: NSW Major Projects portal

**Attention:** Charbel Touma

Dear Mr Touma,

**RE: SUBMISSION TO SSD-78775458, RESIDENTIAL FLAT BUILDING WITH IN-FILL  
AFFORDABLE HOUSING  
Address: 3-9 Park Avenue, Gordon**

Thank you for the opportunity to comment on State Significant Development (SSD) application (SSD-78775458) for demolition of existing buildings, removal of 35 trees on the site, removal of one tree in Park Lane, excavation and construction of a 10 storey residential flat building comprising of 100 apartments (including 31 affordable housing apartments) and two levels of basement car parking at 3-9 Park Avenue, Gordon.

This submission should be considered as an **objection** to the proposal. The submission (**Attachment 1**) gives a detailed explanation of the reasons for Council's objection.

It is requested that the Applicant's Response to Submissions (RtS) is forwarded to Council for review prior to a determination being made. Council will be able to provide recommended conditions of consent following review of the RtS, unless there are substantial unresolved issues.

Subject to satisfactory resolution of the issues raised in this submission, Council may withdraw its objection to the proposal.

Should you have any further enquiries, please contact Peggy Wong, Executive Assessment Officer on 02 9424 0999.

Yours sincerely,

**Selwyn Segall**  
**Team Leader, Development Assessment**

## ATTACHMENT 1

### Ku-ring-gai Council's objection to SSD-78775458, Residential Flat Building with In-fill Affordable Housing at 3-9 Park Avenue, Gordon

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#### A. SITE ISOLATION

The proposed amalgamation of 3, 5, 7 and 9 Park Avenue to create a lot size of 4430.33m<sup>2</sup> will result in the site isolation of 2 Park Lane which is bounded by the subject site to the north, east and west.

Currently, 2 Park Lane has an area of 473.6m<sup>2</sup> with a lot width of approximately 16m to Park Lane. The planning controls applicable to the site in the Ku-ring-gai Local Environmental Plan 2015 (KLEP) includes the following:

- Land use zone - R2 Low Density Residential;
- Minimum lot size - 930m<sup>2</sup>;
- Maximum FSR - 0.3:1; and
- Maximum building height - 9.5m.

Whilst the applicant has demonstrated attempts to acquire 2 Park Lane and identified the existing property is not considered underdeveloped in accordance with the current KLEP controls, it has not adequately demonstrated that the site can be reasonably developed in accordance with Chapter 5 of the State Environmental Planning Policy (Housing) 2021 (SEPP (Housing)). In this regard, the property is located with the Transport Oriented Development (TOD) area for Gordon and redevelopment for higher density residential or shop top housing development to a height of 22m and Floor Space Ratio (FSR) of 2.5:1 is permissible (not including bonus building height and FSR under Chapter 2, if applicable).

However, as 2 Park Lane is bounded by the subject site reasonable redevelopment of the site in accordance with TOD provisions cannot be achieved as the property does not have a minimum lot width of 21 metres as required by Clause 158 of the SEPP (Housing). As a result of the site constraints, any future proposal for a residential flat building or shop top housing development is unlikely to achieve the maximum building height or FSR permitted under the SEPP (Housing) within a building envelope that will complement the surrounding streetscape.

Council does not support the site isolation impact the proposed development will have on 2 Park Lane.

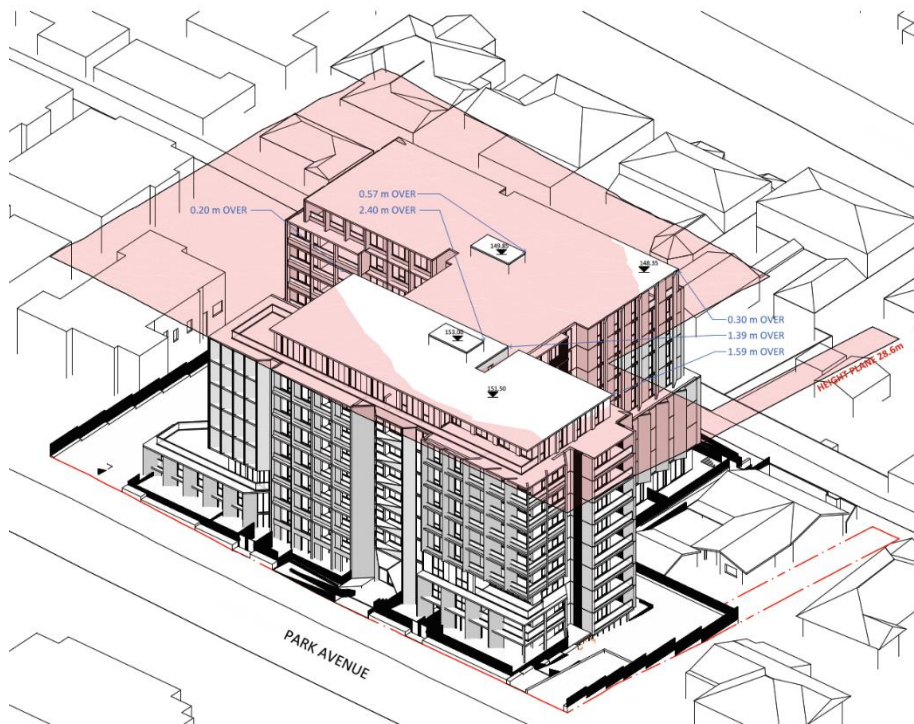
#### B. BUILT FORM CHARACTER

##### Excessive building height

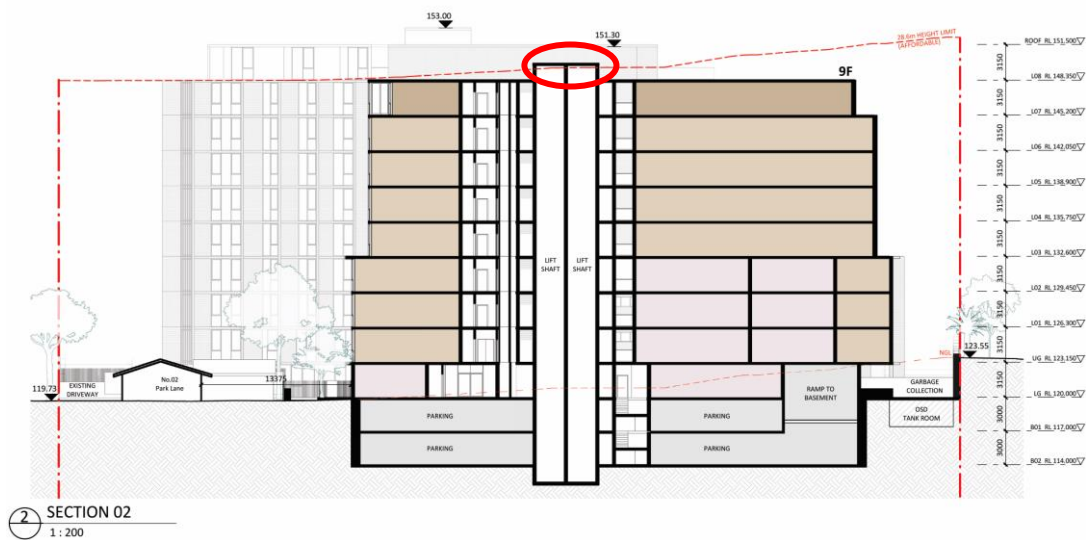
Section 155(2) in Chapter 5 of the SEPP (Housing) permits a maximum building height of 22 metres for a residential flat building within a TOD area. Under Section 18 in Chapter 2 of the SEPP (Housing), an additional 30% building height above the maximum building height control is permitted for infill affordable housing comprising of at least 10% of the development. In this circumstance, the maximum permitted building height for the proposed development is 28.6m.

The proposal seeks a maximum building height of 31m, measured to top of the lift overrun in Building A which exceeds the maximum building height control by 2.4m, equating to a variation of 8.39%.

Other building elements on the upper levels of Buildings A and B, also exceed the maximum building height development standard as shown in **Figures 1 and 2** below.



**Figure 1: Building height blanket (Drawing No. PTW-DA-Q100010, Rev A, prepared by PTW and dated 1 April 2025)**



**Figure 2: Proposed building height (Building B) as shown in section (Drawing No. PTW-DA-D120010, Rev A, prepared by PTW, dated 1 April 2025)**





**Figure 3: View of proposal and variation outlined in red, from Gordon station (View Impact Assessment prepared by Urbis dated March 2024)**



**Figure 4: View of proposal and variation circled in red, looking north from Werona Avenue (View Impact Assessment prepared by Urbis dated March 2024)**

A Clause 4.6 variation request has been submitted in relation to building height. The Clause 4.6 variation request argues that the aims of Chapter 5 of the SEPP (Housing) is achieved notwithstanding non-compliance with the development standard and that compliance is unreasonable and unnecessary based on the following:

- *The proposed development will provide a residential flat building that provides an articulated building form that minimises perceived bulk and scale impacts when viewed from the surrounds of the site. The proposed height and scale of the development is generally consistent with the future character of the area as established by the new built form controls within Chapter 5*

*Transport Oriented Development in the Housing SEPP.*

- *The purpose of the variation is to reduce bulk and scale impacts to the adjoining R3 Medium Density Residential zone. The proposed height variation is consistent with the future intended height of the adjoining E1 Local Centre zone and no additional impacts to bulk and scale will result from the proposed variation.*
- *The proposed height will not result in any visual, privacy or overshadowing impacts to the adjoining properties.*

Upon review of the proposal, Council does not consider the Clause 4.6 variation request to be well founded and objects to the variation of the building height development standard for reasons as follows:

- The extent of the variation contributes to excessive building bulk and scale beyond the building envelopes envisaged for residential flat buildings, including compliant setbacks, articulation and built form. The proposal will detract from the desired future character of the streetscape, significance of heritage items and the amenity of surrounding residents.
- The extent of the variation at the upper levels of Buildings A and B will be clearly visible from surrounding streets and the locality contributing to excessive building bulk and scale that is incompatible with the character of the locality.
- The proposal does not achieve the objective to provide other land uses, such as services and facilities, to meet the needs of residents as the design does not incorporate shop top housing or flexibility within the ground floor level to accommodate future change of use from residential to other uses.
- The proposed massing of Buildings A and B do not respond appropriately to the topography of the site or provide appropriate height transitions between the site and adjoining low scale heritage items. The proposed additional building bulk and scale will not complement the existing or future character of the streetscape and locality.
- Strict compliance with the maximum building height development standard could be achieved with a design that results in less building bulk and massing, and have less visual impact on the streetscape, significance of heritage items and adjoining conservation areas, and character of the locality.
- Insufficient overshadowing information has been submitted to clearly identify the full extent of additional overshadowing cast by building elements that exceeds the building height development standards. In particular, the additional shadowing cast by the variation (shown in blue) on the submitted shadow diagrams only identifies shadowing cast by the lift overruns but does not identify additional shadowing cast by the extent of the roof of Buildings A and B that breach the height control. As such, a detailed assessment of the amenity impacts of the variation to the building height development standard cannot be undertaken by the consent authority.

The Clause 4.6 variation request contains a discrepancy with the proposed architectural drawings and the Statement of Environmental Effects (SEE) in regard to the number of proposed apartments within the development. Specifically, the Clause 4.6 variation request states that the proposal provides 115 apartments where 100 apartments are shown on the submitted drawings and noted in the SEE.

### **Street frontage setbacks**

In accordance with the street setback control in Part 7A.3(1) of the Ku-ring-gai Development Control Plan (KDCP), the minimum street setback control for a residential flat building on a site with multiple street frontages is 10m.

The proposal does not achieve the minimum street setback control in the KDCP as eight levels of Building A have a setback of 6m from Park Avenue and 7.5m setback on the ninth level. Building B has a frontage to Park Lane and does not achieve the street setback control as the first four storeys (Lower Ground to Level 2) is setback 6m, 7.5m on Levels 3 to 6 (inclusive) and 8m on Level 7.

Council raises concern with the proposed street frontage setbacks which are inconsistent with existing surrounding developments, particularly the front setback of the adjoining heritage item at 11 Park Avenue. The proposal will result in a visually dominant development that detracts from the character of the streetscape and amenity of surrounding properties fronting both Park Avenue and Park Lane.

Council recommends amendment to the proposal to provide a minimum 10m setback to Park Avenue and Park Lane which will increase landscape garden areas within the front setback and contribute to a reduction in visual bulk and scale when viewed from the surrounding heritage items and the public domain.

### **Side setbacks**

The proposed side setbacks of habitable windows and balconies on the west elevation of Buildings A and B are inconsistent with the minimum building separation required in Design Criteria 1 in Objective 3F-1 of the Apartment Design Guide (ADG). In particular, the proposed setbacks of between 7.5m and 8.3m on Levels 3 to 6 (5 to 8 storeys) to Unit Nos. A301, A401, A501, A601, B301, B302, B401, B402, B501, B502, B601 and B602 do not achieve the minimum 9m separation from the side boundary and will enable overlooking of adjoining properties from balconies and internal living areas of apartments.

On Level 7 (9 storeys) habitable windows and balconies to Unit Nos. A701, A705, A706, B701, B702 are setback between 7.5m and 11m from the western side boundary and does not achieve the minimum setback of 12m required in Design Criteria 1 in Objective 3F-1 of the ADG. The non-compliance with minimum side setbacks requirements will not achieve acceptable levels of visual privacy between the site and adjoining properties.

The proposal side setbacks identified above are not acceptable as it will not achieve reasonable levels of visual privacy for existing adjoining properties or future developments. The proposed side setback of the upper levels of Buildings A and B to the western boundary will also contribute to excessive building bulk and have an adverse impact on the character and amenity of the streetscape.

### **Gross floor area (GFA) and FSR**

In accordance with Section 155(4) in Chapter 5 of the SEPP (Housing), the maximum FSR for a residential flat building within a TOD area is 2.5:1. As the proposal provides in-fill affordable housing units, an additional 30% FSR is permitted under Chapter 2 of the SEPP (housing) to a maximum of 3.25:1.

The proposal states the total GFA for the development is 13,028m<sup>2</sup> equating to a FSR of 2.9:1. Whilst the proposed GFA is compliant with the maximum FSR permitted for the site, the submitted GFA calculations are incorrect as garbage bin storage areas shown on the plans for the upper ground floor to Level 8 (inclusive) in Building A and the lower ground floor to Level 7 (inclusive) of Building B have been excluded.

GFA is defined under the KLEP as follows:

**gross floor area** means the sum of the floor area of each floor of a building measured from the internal face of external walls, or from the internal face of walls separating the building from any other building, measured at a height of 1.4 metres above the floor, and includes—

- (a) the area of a mezzanine, and
- (b) habitable rooms in a basement or an attic, and
- (c) any shop, auditorium, cinema, and the like, in a basement or attic, but excludes—
  - (d) any area for common vertical circulation, such as lifts and stairs, and
  - (e) any basement—
    - (i) storage, and
    - (ii) vehicular access, loading areas, garbage and services, and
  - (f) plant rooms, lift towers and other areas used exclusively for mechanical services or ducting, and
  - (g) car parking to meet any requirements of the consent authority (including access to that car parking), and
  - (h) any space used for the loading or unloading of goods (including access to it), and
  - (i) terraces and balconies with outer walls less than 1.4 metres high, and
  - (j) voids above a floor at the level of a storey or storey above.

As defined above, garbage bin storage areas above basement levels are not excluded from GFA and are required to be included in GFA calculations.

In addition, the void on the upper level of apartment AU02 in Building A has been included as GFA on the GFA calculation diagrams and is incorrect as the void should be excluded from the calculations.

Council requests that the applicant be required to revise the GFA calculation diagrams to accurately show GFA in accordance with the definition under the KLEP.

### **C. TOD ALTERNATIVE SCENARIO**

In response to the NSW TOD planning policy, Council has developed preferred scenarios for four railway precincts at Gordon, Killara, Roseville and Lindfield. The TOD alternative scenario for Gordon aims to provide additional housing density, services and facilities meet the needs of the community as follows:

- Change of land use zoning from R2 – Low Density Residential zone to MU1 – Mixed use for 3 and 5 Park Avenue and R4 – High Density Residential zone for 7 and 9 Park Avenue. The zoning for immediately adjoining properties to the east and south of the site are also proposed to be changed to MU1 and R4. The change of land use zones from R2 to MU1 and R4 seeks to facilitate additional services to meet the needs of the existing and future population as the area is some distance from existing retail, childcare services and community facilities.
- Change in building height controls to permit 29m at 3 and 5 Park Avenue and 18.5m at 7 and 9 Park Avenue. The proposed building height controls will accommodate residential flat buildings and shop top housing developments whilst providing appropriate height transitions between higher density developments to the west and low scale heritage items and heritage conservation areas in the vicinity of the site.
- The proposed increase in FSR to 2:1 (for 3 and 5 Park Avenue) and 1.3:1 (7 and 9 Park Avenue) seek to allow additional floor space for housing and retail/commercial uses to improve access to services for existing and future residents.
- Minimum affordable housing provisions of 3% for future development contained in 3 and 5 Park Avenue is greater than the 2% requirements under the current TOD controls and will contribute positively to the stock of affordable housing in the locality.

Council does not support the proposal which comprises only residential apartments as the site is considered to be in a suitable location for shop top housing and incorporate additional community facilities to service the wider community.

### **D. STREETSCAPE CHARACTER**

#### **Heritage impacts**

The site is not identified as a heritage item or within a conservation area however, it is in the vicinity of a number of heritage items and heritage conservation areas including:

- 2A, 12-14, 16, 20-22 Park Avenue on the northern side of Park Avenue
- 9 Burgoyne Street to the north
- 11 and 23 Park Avenue to the east
- 16 Khartoum Avenue to the south-east
- C12 – Gordondale Estate Conservation Area to the north
- C39 – Robert Street/Khartoum Avenue Conservation to the south

The predominant low density character of the streetscape comprising of a number of heritage items and adjoining conservation areas contributes to the significance of the locality. The proposed bulk and scale of the 10 storey residential flat building will visually dominate and detract from the setting of heritage items and conservation areas. The proposal massing of the residential flat building will adversely affect views from heritage items to the surrounding area including views to the sky, tree canopies and terracotta roof tops.

The proposal does not respect the established built form and landscaped character of the streetscape and will result in the loss of the garden setting which will irreversibly impact the heritage significance of the locality. In particular, the lack of sufficient stepping of the upper levels of the 10 storey residential flat building and minimal front and side setbacks do not provide any transition in height to surrounding



Concern is also raised that the materials and finishes consisting of light colours, particularly on the upper levels, will be visually dominating and obtrusive in the streetscape, when viewed from surrounding conservation areas and East Gordon. It is recommended that the external materials and finishes be amended to comprise darker, earthy tones to present a more recessive building that responds more appropriately to the aesthetic of surrounding heritage items and conservation areas.



Having regard to the issues above, the proposal will result in drastic, adverse and irreversible change to the setting for surrounding heritage items and heritage conservation areas and is not acceptable.



The proposal is inconsistent with the objectives of Clause 5.10 of the KLEP “to conserve the environmental heritage of Ku-ring-gai” and “to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,” and Article 8 - Setting in the Burra Charter which reads as follows:

*Conservation requires the retention of an appropriate visual setting and other relationships that contribute to the cultural significance of the place. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place.*

*New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate.*

### **Public domain interface**

The sunken lower ground floor private open spaces fronting Park Avenue are approximately 1m below the adjacent street level and will be screened by hedge planting comprising *Syzygium* ‘Cascade Lilly Pilly’. The selected plant species will have a mature height and spread of 3m x 1.8m which will substantially obscure views from the internal and external areas of the lower ground floor apartments to the street. Council officers raise concern that the finished floor level of the private open space and hedge planting along the property boundary will not enable effective sightlines and passive surveillance between private and public domains and is inconsistent with the design objective and criteria as in Objective 4L-2 in Part 4 of the ADG.

### **Vehicular access and pedestrian traffic**

Council notes that the local street network currently experiences high levels of traffic and congestion to Pacific Highway during peak periods which may be exacerbated by the development. Safety issues for pedestrians is also raised particularly relating to access to nearby facilities including the library, preschool and other community services.

Council notes that the development will increase traffic in Park Lane and is likely to result in conflicts between vehicular and pedestrian traffic. Park Lane does not have sufficient width to accommodate two-way traffic and a compliant footpath, therefore Council has identified potential for Park Lane to be modified to minimise safety and amenity impacts for pedestrians, including restriction to one-way traffic with grass verges on either side of the road carriageway in accordance with the Gordon Public Domain Plan.

## **E. LANDSCAPE CHARACTER**

### **Deep soil**

Objective 3E-1 in Part 3 of the ADG requires a minimum 7% of the site to be provided as deep soil with dimensions of 6m. The applicant submits that a total of 380m<sup>2</sup> of deep soil equating to 8.58% of the site area is proposed for the development.

However, these calculations are inaccurate as deep soil areas shown in the plans include structures such as retaining walls, stairs, fixed seating/pergola structures resulting in deep soil areas less than 6m in dimension. Such structures are to be excluded from deep soil area calculations as per the definition, which reads as follows:

*Deep soil zone: **deep soil zone** means a landscaped area with no buildings or structures above or below the ground.*

As the site has an area of 4430.33m<sup>2</sup>, Council considers it is appropriate in this circumstance, to require a minimum of 15% of the site be provided for deep soil in accordance with the design guidance in the ADG.

Additional deep soil areas should be provided particularly along street frontage and side boundaries to accommodate substantial landscaping including layered planting and medium and large trees.

## **Landscape Planting**

Council notes that in the absence of additional substantial deep soil areas along the street frontage and side boundaries, planting of appropriate large trees or layered planting on the site is constrained. As such, the proposal does not contribute to the expansive tree canopy and garden setting character of Ku-ring-gai and is inconsistent with the Ku-ring-gai Urban Forest Strategy.

Large areas of the street frontage setbacks to Park Avenue and Park Lane comprise of excessive paved areas that visually dominate the streetscape. The proposed 6m setbacks to Park Avenue and Park Lane are insufficient and does not enable planting of large trees which are characteristic of the landscape setting of the street.

The landscaped areas within the street frontage setback are predominantly located within private open spaces of the lower ground and ground floor apartments fronting Park Avenue and Park Lane. Council does not support this landscape design as substantial plantings should be located within common open spaces to ensure effective and consistent ongoing management of landscaping for the site.

The location of the driveway to the basement and waste service driveway immediately adjacent the side boundary of 11 Park Avenue is visually dominate and compromises effective landscaping along Park Lane provision within this area.

The proposed selection of tree species including *Eucalyptus tereticornis* (Forest Red Gum) and *Corymbia maculata* (Spotted Gum) are not suitable as these species are not native to the locality. The proposed landscape plan is not supported as the tree plantings does not contribute to the landscape character of the streetscape or locality and is inconsistent with Objective 4O-2 in Part 4 of the ADG.

It is recommended that the proposal be amended to achieve satisfactory landscaping of the site as follows:

- Greater street frontage and side setbacks to provide additional deep soil areas for large trees and layered planting to enhance amenity for adjoining properties and contribute to the streetscape and landscaped character of the locality.
- Reduce the extent of paved areas within the street frontage setbacks and increase areas for soft landscaping.
- Replace proposed tree species (Forest Red Gum and Spotted Gum) with local native species such as *Syncarpia glomulifera* (Turpentine) and *Angophora costata* (Sydney Redgum).

## **F. RESIDENTIAL AMENITY**

### **Affordable units**

The amenity of some of the affordable housing units is compromised. A large number of affordable units receive neither cross-ventilation, nor solar access (including but not limited to Unit AL02, BL02, BL03, AU08, BU02, BU03, B303, B403, B503 and B603). It is also noted that Units BL01 and BL02 receive no cross ventilation and less than two hours of solar access. The applicant should ensure that the amenity of the affordable units is not unfairly compromised.

### **Communal open space**

The proposal provides two areas of communal open space located along the eastern and western side boundaries which are connected by the common area between Buildings A and B at the centre of the site.

The communal areas identified in the compliance diagram (Drawing No. PTW-DA-Q120010, Rev A, prepared by PTW and dated 1 April 2025) provide compliant dimensions and equate to 25% of the site area as required in Design Criteria 1 in Objective 3D-1 of the ADG.

Whilst shadow diagrams provided in the SEE appear to indicate solar access is achieved to the communal areas between 9am and 3pm on 21 June, insufficient clarification is provided to

demonstrate that principle usable areas within the communal open space will receive a minimum 2 hours of direct sunlight. In this regard, a significant portion of the nominated communal open space consist of stairs, circulation spaces and garden beds/planters. The applicant should be required to clearly identify principle usable areas (including dimensions) within the communal open space and provide overlays of shadow diagrams to demonstrate compliance with solar access requirements.

### **Overshadowing of adjoining properties**

The overshadowing diagrams provided in Figures 21 and 22 of the SEE do not provide sufficient information to enable a proper comparison of existing solar access to habitable windows and private open space of surrounding properties, shadow impacts of a compliant building envelope and overshadowing cast by the proposed development. Proposed shadow diagrams should also clearly identify the extent of additional overshadowing cast by the building elements that exceed the maximum building height development standard.

Having regard to the non-compliance with the maximum building height development standard and insufficient setbacks, the building envelope is excessive and any additional amenity impacts on adjoining properties and the streetscape is considered unreasonable and is not supported.

### **Car share spaces**

The KDCP requires car share spaces for residential developments of more than 90 dwellings, and the application proposes 2 car share spaces, which complies. Guidance from one car share provider suggests the following provision:

- Provide 1 on-site car share vehicle for every 10-15 units without parking (dependent on location to transport hubs)
- Provide 3 on-site car share vehicles for every 100 2-bed+ units with one parking space

Given that the proportion of dwellings without car parking spaces is higher than average for the area (from 2021 Census), and the proportion of units with only 1 space is lower than average for the area, it is recommended that the number of car share spaces be increased to 3, with flexibility to increase them further in the future if required.

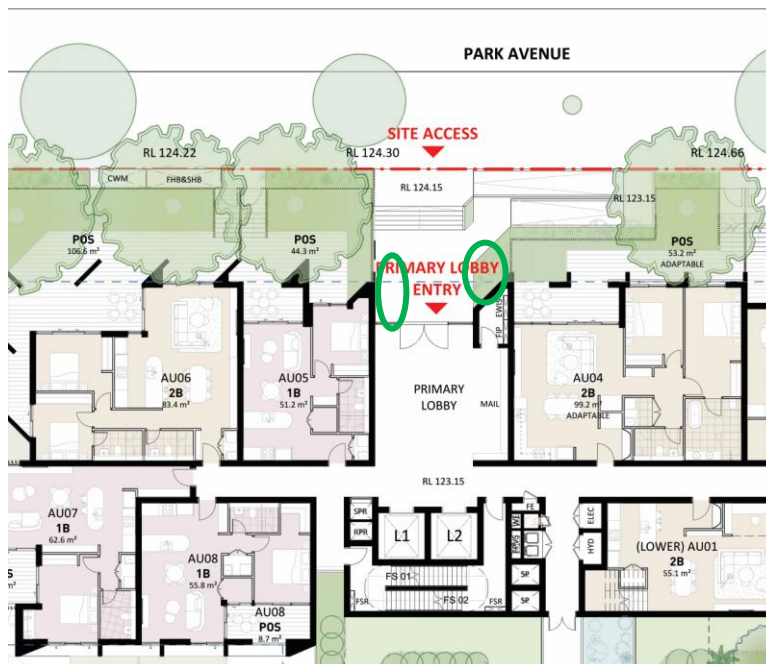
EV readiness is to be provided for all car parking spaces within the development.

### **Bicycle parking**

Resident bicycle parking is proposed to be located in each apartment's allocated storage areas spread across Basement 01 and Basement 02. The entry/exit ramp and the ramp connecting the basement levels have gradients of up to 1:5.5 (18%), which generally will exceed the capability of many bicycle users to remain mounted with stability (1:12, or 8% is practical). Therefore, the lifts and lobbies should be of a suitable size such that residents can transport their bicycles between their storage area and ground/street level without using the internal car park ramps.

Visitor bicycle parking is proposed to be located on the Basement 01 level. There are similar ramp gradient access issues for visitor bicycles as that noted above. Given the additional practicality of visitors entering the secure parking area to access the bicycle parking from the main entry ramp, it is recommended that the visitor bicycle parking be relocated adjacent to the Primary Lobby/Entry area from Park Avenue shown in green on the Upper Ground Floor plan (**Figure 7** below):





**Figure 7: Alternative location for visitor bicycle parking**

The design of the pedestrian ramp leading from street level to the Primary Lobby/Entry area should ensure adequate access for people to dismount and wheel their bicycles between street level and the Primary Lobby/Entry area.

## **G. VEHICULAR ACCESS**

### **Residential and visitor access**

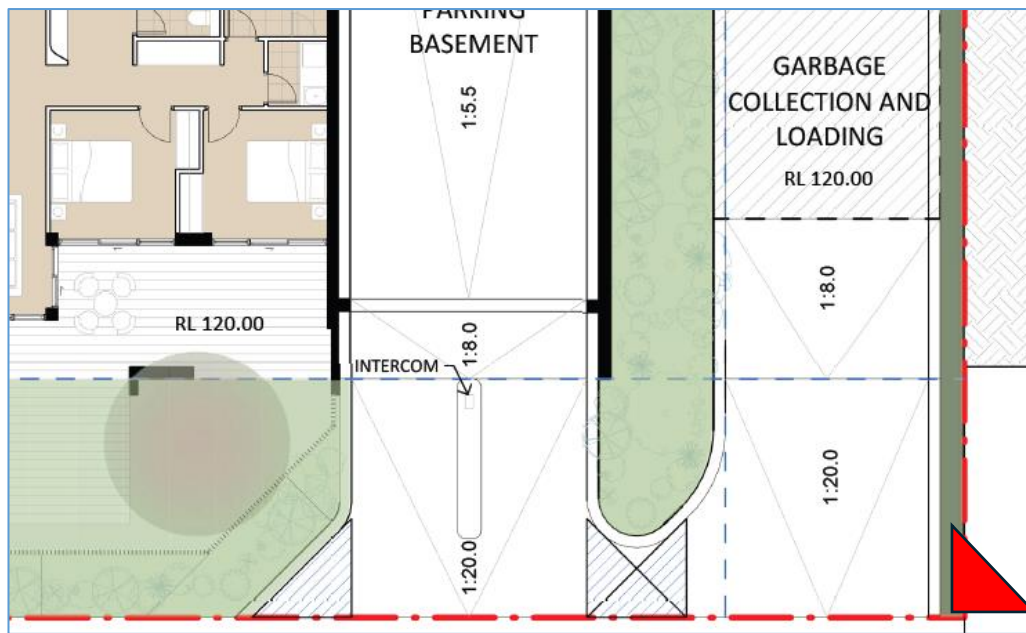
The proposal provides a driveway access between the property boundary and the access gate to the basement car park measuring 5.9m (including 0.6m wide central median for access intercom). This results in a roadway width (between kerbs) of 2.6m, which is below the minimum of 3.0m required by clause 2.5.2 of AS2890.1. The width of the internal access roadway is required to be amended to achieve compliance with the minimum width of 3.0m.

### **Service vehicles**

In the submitted Transport & Accessibility Impact Assessment (TAIA), the swept path analysis for the 6.7m Mitsubishi Canter waste vehicle has been provided for the forward entry and reversing exit manoeuvre. However, given that the access doors to the waste area are at the end/head of the loading bay, reversing into the loading bay would be the logical movement so that collection/loading/unloading can be carried out from the rear of a service vehicle.

Swept paths using the reverse entry and forward exit manoeuvre should be provided. This test should also be carried out using the 8.8m MRV and the 12.5m HRV since these would represent typical removalist vehicle sizes.

There is a non-compliance in the provision of the 2m x 2.5m sight triangle as per clause 3.4.5 of AS2890.2 (shown in red in **Figure 8** below):



**Figure 8: Sight triangle required to be shown on plans to demonstrate compliance with AS2890.2**

It is unclear whether a compliant sight triangle can be provided given the proximity of the loading bay to the side boundary.

Clarification is required as to whether the loading bay can facilitate home deliveries (e.g. groceries, parcel deliveries etc), given the doors at the end of the loading bay only lead to a lift that provides access to the Basement 01 car park level, and there is no readily available pedestrian access from the loading bay to the site access points.

Council will not consider any requests for a Loading Zone on Park Avenue.

## **H. AFFORDABLE HOUSING NEEDS**

Council acknowledges that housing in Gordon is not affordable and population displacement and community retention is a challenge in the LGA. The provision of apartment housing stock in the area, particularly affordable housing, will contribute to addressing this issue. Affordable housing should support lower income-earning key workers that are needed in their local community, such as home support workers, rather than only moderate income earners. It was specifically noted that home support workers that undertake home visits are highly sought after in the local area by aged care providers funded to support ageing individuals who wish to age in place.

Council recommends that all affordable housing units within the development should be operated by a Community Housing Provider in perpetuity (beyond the 15-year minimum requirements) as the loss of affordable housing after 15 years will result in the displacement of that resident population raising the key issues of social isolation with people having to reestablish their social and support networks elsewhere. Loss of the resident population returns the issue of loss of local workforce and thus impacts on the local community reliant on those workers.

## **I. SOCIAL INFRASTRUCTURE AND SERVICES**

Council notes that there is a need for the provision of additional social infrastructure services to meet the demands of an increasing population resulting from high density residential developments such as the subject proposal. In particular, Council has identified the need to provide additional services and facilities including additional library spaces, cultural facilities, hireable community spaces, aquatic centres, indoor recreational spaces and open spaces to meet the demands of residents.

It is also important for the applicant and consent authority to identify the capacity of existing services

such as pre-school and childcare places and address future demands as such services will be required to support young families that move into the development.

Council notes that over subscription of schools and hospitals and other social services have not been considered by the State Government for the expected cumulative development that will result from the increased housing reforms.

## **J. INSUFFICIENT INFORMATION**

### **Landscape Area Calculations**

In accordance with Clause 19(2)(b) in Chapter 2 of the SEPP (Housing), the development is required to provide a minimum landscaped area of 1,329m<sup>2</sup>.

Council officers note that no compliance diagrams and calculations showing the landscaped areas and demonstrating compliance with the non-discretionary development standard has been submitted. It is recommended that the applicant be required to prepare a plan clearly showing landscaped areas with accompanying calculations for consideration.

### **BASIX Certificate**

The proposal includes private open space to ground floor apartments in Buildings A and B, however, the submitted BASIX Certificate indicates that no apartments have gardens or lawn and is inconsistent with the architectural and landscape plans.

The BASIX Certificate does not indicate the provision of taps for irrigation of gardens and lawn in communal areas.

The BASIX Certificate is required to be amended to incorporate all required information including taps in communal areas and gardens and lawn areas within private open spaces of ground and lower ground floor apartments.

### **Green Travel Plan**

The Green Travel Plan contains inconsistent and inaccurate information that needs to be revised including the following:

- Number of residential car parking spaces noted in Section 2.5 (Off street Car Parking) is inconsistent with the number of car parking spaces identified in the TAIA and SEE.
- Reference made to existing modes of travel in Section 2.7 (Existing Mode Choice) utilised by residents and workers within the Wahroonga (East) – Warrawee SA2 area, is not related to the area of this application.
- Insufficient information provided in Section 5.1.3 (Car Share) to acknowledge onsite car share provisions as the primary availability of car share vehicles.
- In Table 4 (Green Travel Plan Action Table), it suggests that Council is also responsible for dedicated car share vehicles, presumably referring to the on-site car share proposed in this application. While this would be the case for fixed-space on-street car share vehicles, there are none currently in the area, with only a “free floating” car share vehicle in nearby in Khartoum Avenue. However, this vehicle does not have a dedicated space and its longevity in that location cannot be assured. Therefore, Council should be removed as having responsibility for car share in the Green Travel Plan.
- In the Cycling category, the commentary should highlight presence and location of visitor bicycle parking spaces.
- Appendix A Transport Access Guide – as discussed above, the car share section should highlight the on-site car share spaces, not only nearby on-street.
- If visitor bicycle parking facilities are relocated as recommended in this assessment, the location will technically not be “secure”, but in a location where user access and casual surveillance is good.