

SUBMISSION: MIXED-USE DEVELOPMENT, RANGERS ROAD / YEO STREET

APPLICATION NUMBER SSD-82875708

I wish to object to the proposed rezoning and development application for the following reasons.

Overshadowing

Sydney North Planning Panel (SNPP) in its decision of 31 October 2024 stated:

The Panel discussed the matter of solar access to the properties in Yeo Street and the advice provided by the proponent at the Panel meeting including the spreadsheet showing an analysis of sunlight to each dwelling. The Panel is unable to deal with development application matters in its deliberations but unanimously recommends that the Council be requested to ensure it is satisfied that any development application demonstrates that the living areas of all the dwellings in Yeo Street achieve a minimum of 2 hours sunlight in mid-winter.

North Sydney Council has amended the NSDCP 2013 to align with the recommendation from SNPP with regard to solar access for Yeo Street dwellings.

It seemed to me at the SNPP meeting of 31 October 2024 that the Fabcot representatives, when questioned by Panel members, believed the Department's planners would support their position regarding the issue of solar access. They did not seem to think there was any need to demonstrate to the Panel what level of solar access was being provided.

I have discussed the issue of solar access with Melissa Neighbour of Sydney YIMBY (Yes In Our Backyard). Melissa is a town planner who supports the State Government's housing interventions. She was happy when I told her that local residents were "coming round" to a redevelopment of this site. However, she also stated that there are significant overshadowing issues to the south and careful design is needed. Her comments reflect basic good planning.

The proposal should be redesigned and documentation provided to demonstrate that the living areas of all the dwellings in Yeo Street achieve a minimum of 2 hours sunlight in mid-winter.

Traffic and Parking

Public parking – Fabcot's first attempt to include extra parking spaces

SNPP, when carrying out the rezoning review of the first planning proposal submitted by Fabcot, considered the issue of traffic on local roads. The reference design included a car park with 350 car parking spaces. The Panel in recommending the planning proposal not proceed to gateway in its then form cited concerns over traffic on local roads and recommended:

b) Removal of the additional 88 car spaces and compliance with the North Sydney Council DCP car parking rates. (See note below)

The removal of 88 car parking spaces would have reduced the number of car parking spaces to 262. This would reduce traffic movements on local streets. It would also mean the car park could have one lane exiting the car park, instead of two. This would reduce the width of the driveway and the potential for conflict with pedestrians.

Note: In the first Planning Proposal Fabcot proposed to provide 88 "public car parking spaces" which it labelled a public benefit. North Sydney council did not view the additional car parking spaces, which were not linked to any specific use, as a public benefit.

Residential parking

The current proposal states that the residential car parking for the 53 dwellings with 3 or more bedrooms complies with a DCP maximum of 1.5 car spaces per dwelling, generating 80 car parking spaces for these dwellings.

However, the proponent's assertion on car parking rates is false. NSDCP 2013 states in Section 10.2.1:

P1 Provide on-site car parking, not exceeding the maximum rates stated in Table B-10.1

TABLE B-10.1 clearly states that for shoptop housing in the MU1 Mixed Use Zone the maximum rate for dwellings with 2+ bedrooms is 1 car space per dwelling.

One of the reasons for supporting a mixed-use development on this site is the proximity to public transport and to the goods and services available in the Neutral Bay village.

The number of residential car parking spaces should be reduced by at least 27 spaces to reflect the NSDCP maximum rates.

Medical centre – Fabcot's new attempt to introduce extra parking

Both the rescinded Military Road Corridor Planning Study and the endorsed Neutral Bay Village Planning Study emphasised the need to provide office space suitable for variety of businesses.

However, the current proposal includes zero office space and a medical centre of 1,494 m².

Office space would generate car parking spaces at 1 space per 60m² of GFA, ie 1,494 m² would generate 25 car parking spaces. A medical centre generates car parking spaces at one space per 25 m² of GFA. A medical centre of 1,494 m² generates 60 car parking spaces, a significant increase over 25 car parking spaces.

Notably, the car park design does not include a security gate to separate the car parking for the medical centre from the retail parking. **If a medical centre is included, then the car parking for the medical centre should be behind security gates that will prevent retail customers and residents and visitors from occupying the spaces.**

The Transport Impact Assessment by JMT Consulting dated 20 June 2025 refers to the recent survey undertaken by TfNSW (*Trip Generation Surveys, Medical Centres* prepared by TEF Consulting).

JMT Consulting fails to say that the medical centre proposed for Neutral Bay is larger than any of the medical centres included in that review.

Further, the TEF Consulting review carried out single variable analysis (on GFA, number of doctors, number of staff, number of consulting rooms) using both linear regression analysis, non-linear regression analysis, and also carried out multiple regression analysis for the various variables and concluded that none of them produced useful results.

It is disingenuous for the JMT report to say, as it does, that the TEF Consulting report shows:

that traffic generation from medical centres is approximately 2.1 trips / 100m² in the AM peak hour and 2.4 trips / 100m² in the PM peak hour.

The TEF Consulting report does not show this.

JMT also fails to say that the NSDCP (Table B-10.1) requires for medical centres:

Proposals for medical centres must include traffic report accurately predicting traffic generation based on similar sized medical centres.

The JMT report does not provide a traffic generation prediction based on similar sized centres. This is a major omission.

What is being proposed is a medical centre that is larger than anything reviewed in Sydney.

A detailed traffic report should be prepared as required by the NSDCP 2013 based on a design and detailed description of the business operation of the proposed medical centre. For example: Will there be a pathology collection service and pathology vehicles coming and going?

Overall, the number of car parking spaces in the development should be reduced to the extent that one lane exiting onto Yeo Street is sufficient.

Ground level design

When I attended a meeting with Fabcot representatives I was given to understand that there had been a falling out between Woolworths and the owner of 183-185 Military Road.

Looking at the plaza design, it appears that a “grudge” travelator and lift have been included to prevent a development on 183-185 Military Road being designed to open to the plaza.

Clearly, activating the northern side of the plaza would be a benefit.

The travelator and lift should be relocated to the Rangers Road frontage where it was originally located in the first Planning Proposal.

A large part of the plaza is shown as alienated by design adjacent to retail tenancies. It appears this is intended to be leasable space. The design should be revised to ensure that plaza space is not alienated for private uses.

I note a blade element has been included next to the exit of Fire Stair 7 to Rangers Road obstructing what would otherwise be a widened footpath. This element should be removed so that pedestrian amenity is maintained.

Affordable housing provision

Ten 1 bedroom apartments with a total floor area of 617 m² have been included. This is equivalent to a GFA of 771 m² (using 80% of GFA as done in the JMT Consulting report).

This area represents 4% of the total GFA of the development.

Given a major uplift is being sought by the proponent, at least 15% of the GFA as affordable housing should be provided.

Thank you for considering this submission.

Meredith Trevallyn-Jones