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Our ref: MP08_0207 & MP10_0219

Mssrs. Lord and Ayres
c/- Urbis Pty Ltd
PO Box 5278
SYDNEY NSW 2001

Dear Sirs,

Subject: Concept Plan (MP08_0207) & Project Application (MP10_0219) - Residential development at Avon and Beechworth Roads, Pymble

I refer to your Preferred Project Report (PPR) for the proposed redevelopment of the above site. As you are aware, the Department has exhibited the PPR documentation and a copy of all submissions received have been forwarded for consideration. In this regard, in accordance with Section 75H of the *Environmental Planning and Assessment Act 1979*, the Director-General requires that a response to the issues raised in these submissions be provided, in addition to addressing any issues raised by the Department.

The Department has reviewed the submissions received to date and has considered the proposal as detailed in the PPR. A number of issues have been identified in relation to the proposal, including the relationship to adjoining development and associated potential amenity and privacy issues, traffic generation, parking and visual impacts. These issues are outlined in **Schedule 1**.

It is considered that a revised PPR should be prepared identifying how the issues raised in the submissions and by the Department have been addressed. The revised PPR must also demonstrate measures to minimise any environmental impacts of the proposal. Revised Statements of Commitment for the Concept Plan Application and the Project Application should also be provided incorporating any amendments following your response to the submissions and should be submitted as separate documents.

As you aware, the Department is awaiting responses from the NSW Office of Water and Transport for NSW. Recent advice from those agencies indicates that their submissions are imminent. Upon receipt of this information the Department will forward copies to you however it should be noted that any matters raised in these submissions may require further information or modification to the proposal.

Your contact officer for this proposal, Helen Mulcahy can be contacted on (02) 9228 2016 or via email at Helen.Mulcahy@planning.nsw.gov.au. Please mark all correspondence regarding the proposal to the contact officer.

Yours sincerely,

Karen Jones
Director

21/3/13

Metropolitan and Regional Projects South

SCHEDULE 1

A. Concept Plan

Relationship to Adjoining Development

The Department notes the apparent proximity of the proposed development to the dwellings on the adjoining sites and raises a concern with potential amenity impacts to these dwellings. Accordingly, the Department requests further information in order to make a detailed assessment the impact of the proposed development in this regard. In particular:

- confirmation of the physical separation between existing dwellings on adjoining properties and the proposed development (including basement footprints). The Department notes a number of anomalies between the information presented on the Survey drawings and the Architectural and Landscape Plans – eg. No. 1 Arilla Road and No. 14 Avon Road;
- further analysis about how the adjoining dwellings at Nos. 3, 7, 11 and 15 Avon Road, No. 1 Arilla Road, Nos. 6, 10A and 10B Beechworth Road present to the subject site. In this regard, details of the elevations in these adjoining dwellings, together with information about the nature of the internal spaces and the adjacent private outdoor spaces which interface with the subject site should be provided together with an assessment of the likely impacts on the privacy and amenity of these properties; and
- elevational shadow diagrams which illustrate the movement of shadows cast by the proposed development across the façade of the adjoining dwellings in mid-winter and at the equinoxes.

Should the result of these investigations reveal an adverse impact to the affected dwellings, further consideration of the siting and design of the proposed building envelopes may be required.

Traffic generation, road capacity and car parking

Agency submissions have noted the potential of the proposal to impact upon the local road network, particularly in respect to the Pacific Highway and Beechworth Road intersection, and the Pacific Highway and Livingstone Road intersection.

The Department requests that the additional information sought by the RMS in its letter dated 8 March 2013 be provided.

The revised on-site parking provision for the Concept Plan and Stage 1 Project Application is generally consistent with Council's current requirements for residential flat buildings and the broader objectives of Metropolitan Plan 2036. However, given the prevailing on-street parking demand in this locality (associated with the PLC School and commuter parking), in combination with the "No Stopping" restrictions in the section of Avon Road immediately adjacent to the site, the Department requests that consideration be given to some reallocation of spaces designated for resident use to that of visitors.

Contributions, works-in-kind offsets and provision of infrastructure

- Council has indicated that a pedestrian refuge is an acceptable alternative to the marked pedestrian crossing at the curve of Avon Road as described in the PPR. Further advice as to the feasibility of providing a refuge in this location to facilitate the safe movement of pedestrians across Avon Road should be provided.
- Further clarification / confirmation regarding the staging of the various infrastructure works is required. The PPR and supporting documentation has not clearly identified the extent of infrastructure works that are to be provided at each stage of the development. This should be specified in the Statement of Commitments.

B. Stage 1 Project Application

Deep Soil / Encroachment of the Basement into the Avon Road Setback

The basement of the Stage 1 building significantly encroaches into the Avon Road setback / deep soil zone. The Department concurs with Ku-ring-gai Council's concerns in this regard and it is requested that the basement be reconfigured to provide a more generous dimension between the basement and the Avon Road boundary to increase the area of deep soil and contribute to the garden setting which is characteristic of this locality.

Allocation of Parking

Whilst the provision of 55 spaces for the Stage 1 building satisfies Council's numerical requirements (as set out in DCP 55), the proportion of resident to visitor spaces requires revision to address concerns about the existing demand for on-street parking in the locality (refer previous comment).

ADDITIONAL INFORMATION REQUIRED / COMMENTS

In addition to any revised architectural plans and supporting documentation reflecting the issues raised above, the following information is also required:

- revision of the traffic modelling to address the points raised in the RMS's submission dated 8 March 2013. Electronic copies of the SIDRA modelling are required for detailed assessment and review by RMS;
- further assessment of the impact of the proposed development (and specifically Building 5) on the existing heritage item at No. 6 Beechworth Road;
- the Office of Environment and Heritage has requested further analysis of the potential indirect impacts of the development on native vegetation within the proposed conservation area;
- revised Statements of Commitments where appropriate, providing a response to the Department's key issues and those raised by other agencies;
- perspective studies of the development when viewed from Arilla Road and along the section of Avon Road adjacent to the rail corridor would assist the Department in making an assessment of the impact of the proposed development on the public domain.

Stage 1 Project Application

The following additional/revised plans and documentation is required:

- dimensions to illustrate basement clearance – to ensure that waste vehicles can access the garbage store;
- amended basement plan should also be fully dimensioned;
- confirmation of the number of accessible dwellings in Building 1 – Access Report suggests 5 whereas the architectural drawings show 4;
- further detail to be provided in relation to planting palette for Building 1 – species, size etc to demonstrate achievement of BASIX commitments;
- WSUD report indicates rainwater tank and on-site detention tank are to be provided in the basement however this is not reflected in the architectural drawings. This should be detailed in the amended basement design.

Clarification required

Clarify / correct errors and inconsistencies in the submitted documentation including, but not limited to:

- correct identification of adjoining properties – for example No. 10B Beechworth appears to have been mis-labelled as No. 10A;
- the deep soil zones identified in the landscape plans are inconsistent with the basement plans included in the architectural drawings, in particular Building 1 in the Avon Road setback.