

Thankyou for the opportunity to comment on the Addendum Response to Submissions (RtS) from the Proponent. Please see below comment.

We note that the documentation has deleted the unit layouts and linked the proposal back to what a core building envelopes with building dimensions and building separations – this is acceptable as it will enable building articulation in accordance with Council's DCP.

Below are our concerns requesting further final amendment to the application, and suggestion for conditions to be attached to the modification approval:

#### **General**

- The top most floor by condition should be limited to plant / roof top terraces. No residential units should be located at the level. This is consistent with what the proponent is suggesting within their written submission. **This could be a condition of the modified approval.**
- The basement foot print should be deleted from the plans as these exceed significantly the building footprints; as should the location of the access into the basement and on street car parking locations. These are all things that should be considered and resolved as part of the DA. A Concept approval should not go to such detail and complicates the ability of the best design solution to be found in the context of the overall design and surrounding development, particularly where this conflicts with the Concept approval diagrams. **The basement foot print and location of the access into the basement and on street car parking locations should be deleted from the plans.**
- To be consistent with the updated maximum building heights, **Condition A8(1) should be amended.**

#### **Bushfire**

- "APZs should be identified on plans for interface allotments by either a building line or building footprint. In some cases building envelopes are identified which include other building constraints. Unless otherwise specified, a building envelope will be taken as the building footprint" (PBP 2016 Appendix 2, p.57)

It is accepted that APZ distances are measured from the wall of a building, or for parts of the building that do not have external walls, to the supporting posts or columns. At the planning stage the assessment is based on building footprint; eaves and roof overhangs are excluded.

At this concept plan stage, while detailed design drawings are not yet approved, we can be satisfied that the APZ requirements of PBP will be met only if building footprints are shown to not encroach on the APZ. The concept plans must ensure that no parts of the building footprint extending into the APZ making the proposal non-compliant with the Acceptable Solutions for Asset Protection Zones as described in Section 4.1.3 of PBP 2006. If the proponent wishes to deviate from Acceptable Solutions an Alternative Solution must be proposed at DA stage, at which time the proponent must provide substantiated evidence that the specific objectives and performance criteria listed in PBP can be met. **Ensure no part of any building footprint encroaches into the APZ.**

#### **Ecological, Water, Contamination and Aboriginal Heritage**

- With regards to biodiversity, water, contamination and Aboriginal Heritage, the proposed amendments to residential building envelopes and residential car parking rates should cause no increase to the

impacts already considered under previously approved concept plans and modifications. **Ensure no increase to impacts on to biodiversity, water, contamination and Aboriginal Heritage.**

## Car Parking

- There is still concern that the hosting of a car share vehicles in the Wahroonga Estate is not going to be implemented. In relation to car share vehicles, the Transport Management Access Plan (revised) prepared by Halcrow (2009) for the Wahroonga Estate Concept Plan notes in Section 4.3 that:

*The Church proposes to build on its already high car pooling practice and introduce an innovative car pooling system for staff, students and **residents who will reside in the new residential community on the Estate** [emphasis added]. Cars would be booked in advance, in a similar manner to a number of schemes which currently operate within the Sydney metropolitan area [such as GoGet, Popcar etc].*

and

*The proposal includes a condition of occupation / ownership that all residencies (excluding aged care) would pay a levy to support the car share scheme and provide capital for its operation.*

The Transport Management Access Plan also proposed reduced parking provision for the residential (non-aged care) dwellings within the Estate, which would be complemented by the car share scheme. Abandoning the introduction of a car share scheme would send the wrong message about private vehicle use and leave fewer options for those residents that do not want to own a vehicle or need occasional access to additional vehicles.

While the Response to Submissions dated 10 December 2018 correctly notes that the Ku-ring-gai DCP does not require car share parking spaces, the proposal to host car share vehicles was introduced in the Transport Management Access Plan, which supported the Wahroonga Estate Concept Plan. With the potential for approximately 200 apartments in the Central Church Precinct (as well as other nearby land uses), there would already be critical mass to support the hosting of car share vehicles on site.

Please contact us if you require any further clarification.

Kind regards

**Rathna Rana**

Senior Urban Planner | Strategy and Environment | Ku-ring-gai Council

P: 9424 0991 | F: 9424 0001

E: [Rrana@kmc.nsw.gov.au](mailto:Rrana@kmc.nsw.gov.au) | [www.kmc.nsw.gov.au](http://www.kmc.nsw.gov.au)

*Ku-ring-gai: Sydney's green heart*