

Ku-ring-gai Council's submission on this development proposal is given below:

1. BUILDING HEIGHT

Council notes the overall height of the building has been reduced compared to that in the approval.

This is seen as a positive step towards acknowledging the single and double storey homes that form the streetscape of Comenarra Parkway. The proponent drawings indicate that there are 3-storey developments on the opposite side of Comenarra Parkway. This is not the case. The buildings all along Comenarra Parkway, and those in the vicinity of this proposed development, are predominantly single storey residential dwellings with a few two storey homes, and a two storey SEPP 53 development close to Browns Road. None of these present to Comenarra Parkway as three storey development.

- **Council request that the drawings be corrected to show the true height and setback of residential development on the opposite side of Comenarra Parkway.**

2. BOUNDARY LINE AND SETBACK

Council notes that the setbacks of the building to Comenarra Parkway have been indicated to a proposed footpath that forms part of the road widening works.

The drawings do not clearly indicate the new SAN property boundary that has been adopted to take into account the road widening associated with the "Wahroonga Estate External Road Works (Ultimate)" (Northrop consultants). The road widening of Comenarra Parkway form a part of the agreed traffic improvements in this locality, and will result in the SAN property having a new property line to Comenarra Parkway.

The 6m setback indicated is to the edge of a footpath that forms part of a 'worst case scenario' road widening kerb line. It is not dimensioned to the property boundary. The position of any verge and footpath may vary according to road design requirements later on in the road building stages, however, the property boundary line following the resumption of land for the road widening works is a fixed survey point and dimension. Therefore any building setbacks need to be shown from an actual fixed boundary dimension.

- **Council request that the new actual property boundary line, post-road widening, be clearly indicated on the drawings, and setback dimensions to the building be shown from the property boundary line.**

3. SETBACK TO COMENARRA PARKWAY

Council notes that the setbacks of the building to Comenarra Parkway have been substantially reduced compared to the approval.

The modification provides a 6.0m setback to the new footpath line. The approval was for an education building with two-thirds of the building having a 15.0m or more setback measured from the same footpath line indicated in the modification 3 drawings, and one third of the building having an 8.5m setback to the same line.

Within the Ku-ring-gai LGA all residential flat buildings (three stories and above) are required to provide a minimum 10.0m to a maximum 15.0m, setback to any street boundary. The SAN Education Centre building proposal is of similar bulk and scale as a 3-storey apartment building and it is reasonable to request that these setback requirements be observed.

Further, all residential dwelling buildings forming the streetscape of Comenarra Parkway are required to provide setbacks to the street of 9.0m on the low side of the street, and 12.0m on the high side of the street. This Education Centre building sits on the high side of Comenarra

Parkway, therefore it is reasonable to request the minimum 12.0m setback be complied with given the scale and bulk of this commercial building fronting onto the residential streetscape of Comenarra Parkway.

- **Council request that the Education Centre building have a minimum 12.0m setback from the new property boundary line on Comenarra Parkway to preserve the predominantly single storey and vegetated streetscape of Comenarra Parkway.**

4. LANDSCAPING

Council notes that the setbacks of the building to Comenarra Parkway have been substantially reduced compared to the approval.

The diminished setback will reduce the available landscape area for planting, more so given the potential location of the footpath which will require a clearance and preclude substantial trees being planted directly adjacent to it.

To ensure a substantial landscape setting for the building, when viewed from the Comenarra Parkway, the setbacks from the building line to the boundary should be maintained to be at least consistent with setbacks required for a 2 storey dwelling in this area.

This area should also not be encumbered by public footpaths or other structures. This would allow an adequate space to establish substantial landscaping including canopy trees and understorey planting along the Comenarra parkway frontage.

- **Council request that the Education Centre building have a minimum unencumbered 12.0m setback from the new property boundary line on Comenarra Parkway to allow substantial landscaping.**

5. CARPARK

Council notes that the size and location of the carpark to the Education Centre has been significantly altered.

This modification seeks parking for 43 cars. The approval was for a 9 space carpark located close to the existing internal ring road with limited footprint. Council does not disagree with the requirement for extra carparking spaces, only with their location.

This hospital site is historically one of a building sitting in a garden setting with bushland views. Council's concern is the erosion of the tracts of green area that surround the hospital and that present to the public domain. This erosion of landscaped green areas as a result of a ring of carparking is already in place with the initial approval and the subsequent two modifications. The placement of a new at ground carparking area adjacent to Comenarra parkway, as proposed in this modification 3 continues this cumulative denudation of landscaped area around the hospital site.

To ensure the preservation of landscaped area around the buildings and in particular close to Comenarra Parkway, the carpark should be configured to sit adjacent to the existing hospital ring road and carparking that already extends off that ring road. Alternatively a basement parking could be provided under the Education Building itself to preserve the soft landscaping area.

- **Council request that the split carpark shown in this modification 3 be combined into one area that is located close to the hospital's existing internal ring road, removing the carpark proposed to the rear of the proposed Education Centre building and adjacent to Comenarra Parkway.**