



Greenwich Community Association Inc

PO Box 5057, Greenwich, NSW 2065

Submission

DA 99/2021

Top Spring Property and Development Services Pty Ltd 21-41 Canberra Ave/18-32 Holdsworth Ave, St Leonards

The Greenwich Community Association Inc (GCA) makes the following submission in respect of the above DA (the DA).

Overview

The site for the DA is a challenging site by virtue of its sloping nature, both north to south and east to west. As the Architectural Drawings Appendix 4, itself, says *“Deceptively simple in plan, the steeply sloping site is complex in section: a 22m crossfall means seven different levels interface with the ground”*. p 19

The LEP and DCP controls for the site sought to address community concerns about a range of issues, height of buildings and overshadowing of developed and open spaces being two key concerns.

The drawings made available to the community are difficult to understand in terms of how the individual buildings sit on the site and how they relate to the prevailing topography.

In the case of all but one building in the DA, storey numbers are in excess of the storey numbers outlined to the community and to Councillors when Council decided to adopt the SLS Plan and when Council adopted its draft DCP.

Whilst the additional storeys may be compliant in terms of the DCP, it is important that Council and the community satisfy themselves that the overall building heights are consistent with the incentive heights of buildings specified in the LEP.

And, from the community perspective, where dwelling numbers were an important consideration in the Master Plan, it is important to determine how many dwellings will be realised through the DA relative to the number estimated for the site by Council.

The GCA has the following specific comments about the DA:-

1. Height of buildings

Noting that height of buildings is defined in the LEP as *the vertical distance from ground level (existing) to the highest point of the building* it is difficult to determine LEP height compliance using the elevations in Appendix 4.

This difficulty derives from:-

- the sloping site
- difficulty in determining, in some cases, ground level (existing)
- lack of clarity around location and height of plant and equipment.

Building height is particularly relevant for this development site, given the potential to overshadow Newlands Park along the eastern perimeter of the site and the visual impact of the buildings that front River Road.

To assist the community to satisfy itself as to compliance with height controls, the GCA requests Council to make available to the community a 3D massing model that shows extrapolated height planes.

2. Overshadowing of Newlands Park

The St Leonards and Crows Nest 2036 Plan includes at p 37 the following statement:-

Retaining solar access to public open space, valued streetscapes, and residential areas is a key objective of the Plan. Solar access controls - are outlined in the Solar Access Map.

The solar access controls protect these key places by requiring that new development in the area does not produce substantial additional overshadowing during specific hours in mid-winter (21 June). These requirements can limit the bulk and scale of new development in order to maintain hours of solar access.

Newlands Park is listed as a public open space.

Public Open Space 10.00am - 3.00pm

- 1 Christie Park
- 2 Newlands Park
- 3 St Leonards South (indicative)
- 4 Propsting Park
- 5 Hume Street Park
- 6 Ernest Place
- 7 Gore Hill Oval
- 8 Talus Reserve

Whilst the DCP provides that *Building design must ensure that overshadowing of public (i.e. Newlands Park and Local Park) and private open spaces (Green Spines) is minimised*, the GCA submits that this document should be read in conjunction the relevant provisions of the 2036 Plan.

The diagrams provided in the Architectural Drawings p 41 are unclear.

In particular we note the following:-

- the artist impressions of the development in Appendix 4 depict an area bathed in sunshine – this is not a characteristic possible in this location.
It will be even less so once the developments to the north and east of the site have been completed.
The level of sunshine achieved with just single level dwellings is accurately depicted in the photos on p 9 of Appendix 4.



- solar access to the site and to adjacent properties and public spaces will diminish with a development of the scale proposed
- the contours of Newlands Park are not indicated in the modelling on p 41

- the legend for the drawings does not explain the differentiation between the lighter and darker green areas.

The modelling as currently included in Appendix 4 indicates an unacceptable impact on solar access between the hours of 1 pm and 3 pm.

This impact will be exacerbated by the later development of a building of 19 storeys on the corner of Marshall and Canberra Avenues.

The GCA requests that the applicant be required to:-

- undertake more detailed site-specific modelling of solar access
- explore refined design options with a view to the creation of more solar access for Newlands Park consistent with the objectives of the 2036 Plan.

3. Overshadowing of properties on River Road

It is apparent from the solar access drawings on p 41 of the Architectural Drawings that the shadow cast by the proposed development extends over River Road.

The 2036 Plan requires that there be no overshadowing on properties outside the boundaries of the St Leonards Crows Nest Precinct between the hours of 9 am and 3 pm.

The applicant should be required to provide detailed modelling of overshadowing on the southern side of River Road.

4. Vehicular Traffic and proposals for pedestrians and bicycles to cross River Rd

Modelling of Travel Patterns in a non- Lane Cove or North Sydney LGA

There has been no explanation of the decision by JMT Consulting to base its modelling on travel patterns in Turramurra, an area that is not analogous to the St Leonards South area.

Modelling should be revised to reflect travel patterns in the St Leonards Crows Nest area and in a post COVID environment.

Additional Traffic Created

It is known that River Rd is already at capacity during morning and evening peaks.

With 372 additional car spaces the assessment that only 30 more car movements will be generated per hour in the morning peak and 10 more in the evening peak is plainly wrong and this needs to be revisited with assessments properly justified.

Also if this is the result from the first development proposed for St Leonards South, what consideration is being given to account for the increased traffic for the balance of the development and how the total costs of infrastructure will be divided fairly amongst the developers?

River Rd – Duntroon Ave Intersection

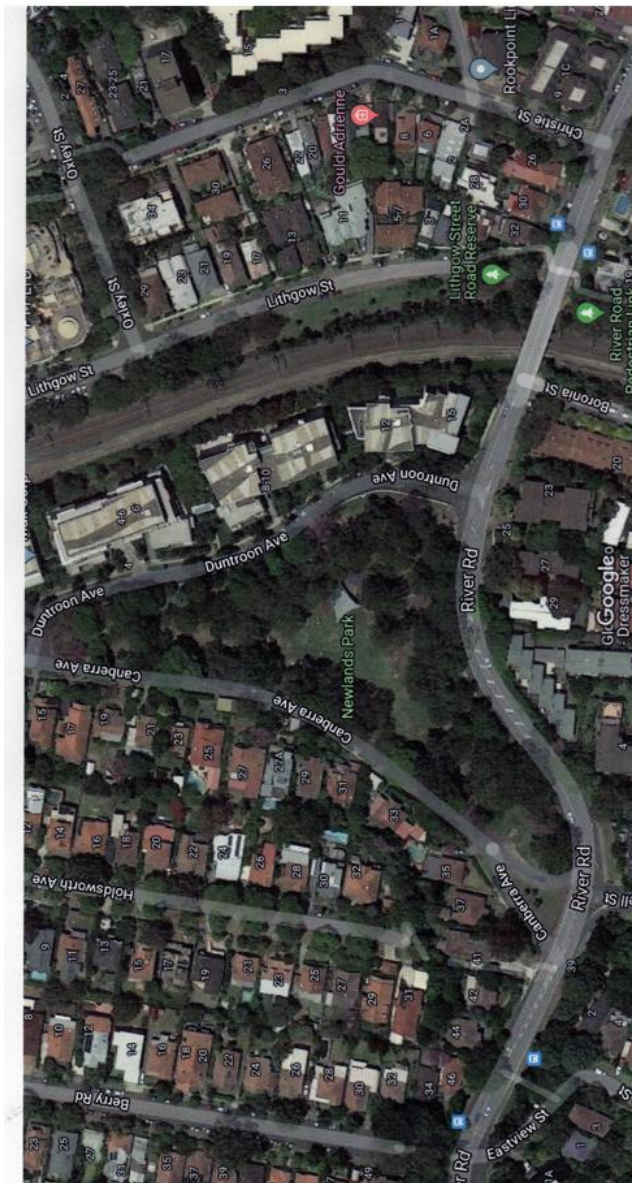
As can be seen from the attached satellite image, the intersection is located adjacent to a sharp downhill steeply sloping S bend to the west, and within 30 metres of an elevated narrow (2 lane) over-rail bridge to the east.

This means that apart from gradient and horizontal curves, sight distance approaching the intersection from both the west and the east along River Rd is severely limited.

Currently there is a very short right hand turn lane from River Rd east into Duntroon Ave and a similarly short queueing lane on River Rd after the intersection for vehicles heading west having turned from Duntroon Ave.

Both of these lanes will be totally inadequate with increased traffic and there is no capacity to safely increase their lengths.

We do not believe that traffic lights will solve the problem given the short sight lines, however a full investigation is needed.



River Rd – Canberra Ave Intersection

It is understood that Council is considering closing this road to increase the area of Newlands Park.

Unfortunately, the additional park area created will be minimal and almost entirely in shadow during the winter months.

Therefore, the intersection should remain as it is, with left hand turn into Canberra Ave and left hand out of Canberra Ave movements only.

Also, should Canberra Ave be closed, the additional traffic diverted to Duntroon Ave would not be a safe option for such a narrow road requiring passing bays to allow 2 way traffic and with such a difficult River Rd intersection discussed above.

Pedestrian and Bicycle Movements

No solution has been proposed to facilitate pedestrians crossing between the new development and the nearest railway station – Wollstonecraft.

As the GCA has mentioned previously the only satisfactory solution would be a pedestrian/bike bridge from Holdsworth Ave over River Rd.

Should a pedestrian crossing and/or traffic lights be proposed, serious accidents are a certainty with the crossing located at the bottom of a long steep hill incorporating an S bend such that the crossing itself would only become visible to vehicles some 100 metres from its location for vehicles travelling west.

5. Relocation of car park access

The location of a single vehicle access point to the entire development carpark will pose danger to pedestrians and it will cause unacceptable pressure on the tight road network around Newlands Park.

The GCA requests that serious consideration be given to relocation of the vehicle access to the carpark in Holdsworth Ave.

We note that this was a recommendation of the Design Review Panel.

6. Apparent loss of 6 storey step up in Building 11 on cnr River Road and Canberra Avenue resulting in a dominant structure

The height control map in the DCP (Figure 10) depicts a step up from 4 to 6 storeys at the western side of the Building 11 site.

This 6 storey portion appears to have been left out of the plans, resulting in a more dominant structure than was anticipated.

This results in a form that is inconsistent with the Built Form Objective of the DCP :-
Provide transitional built form at edges of the precinct.



Figure 10: Height of Buildings (in storeys)

Conclusion

The GCA submits that further detail should be provided by the applicant before Council progresses with its assessment of this DA:-

1. The documentation before Council lacks the detail required to fully assess compliance with the height of building controls in Part 7 of the LEP and in Part C of the DCP.
The applicant should be required to provide appropriate modelling to allow a full analysis of building height from all elevations relative to the topography of the site.
2. Further detailed analysis of overshadowing of Newlands Park and the southern side of Rver Road should be provided to Council and the community
3. The JMT Transport Impact Assessment should be reworked using travel patterns that prevail in mixed residential/commercial precincts in the St Leonards South/Crows Nest area and which reflect projected changes in public transport usage post COVID.

The GCA requests that further opportunity for public comment should be provided after this material is made available to Council.

We request Council to defer assessment of this DA until the above steps have been completed.

Merri Southwood
President

14 September 2021