

Submission to
The Independent Planning Commission
regarding
**Pathways Cremorne Seniors Housing
(SSD-49472213)**

By
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CONTENTS

SECTION	PAGE
INTRODUCTION	3
KEY ISSUES	3
1.0 Heritage	3
2.0 Height, Scale and Setback	4
2.1 Height	
2.2 Scale	
2.3 Setback	
2.4 Habitable Rooms	
3.0 Acoustics	6
4.1 Air conditioners	
4.2 Driveway Noise	
4.0 Landscaping	6
5.1 Through-site link	
5.2 Plantings	
5.3 Soil analysis	
5.0 Solar Access	8
6.0 Construction	8
6.1 Hours	
6.2 Noise	
6.3 Construction Stages	
7.0 Traffic, Parking and Pedestrians	9
7.1 Construction Traffic	
7.2 Street Traffic	
7.3 Underground Parking	
7.4 Pedestrians	
8.0 Social Impact Assessment	12
RECOMMENDATIONS 1 TO 24	13
Structure	
Acoustics	
Landscaping	
Construction, Traffic, Parking, Pedestrians	
Social Benefit	
SUMMARY	14

INTRODUCTION

My name is Fiona Gracie. I am the founder of the Cremorne Conservation Group which has over 1,000 members. I was selected by North Sydney Council to represent the local community on the Neutral Bay Alive Committee which provided Council Planners with detailed feedback on the future character and built form of the Neutral Bay commercial zone. I am a resident in the local area.

The provision of high-quality seniors housing and aged care for older Australians is acknowledged. However, the CCG Group has multiple concerns with the amended reports on this project and the limited extent of the Conditions of Consent applied by the DPHI. Our concerns are informed by State Government and North Sydney LGA planning controls, as well as advice from urban planners, construction, landscaping and social impact assessment experts, which we believe need addressing before this application is approved.

KEY ISSUES

In this submission I will outline the major matters with this development that remain contentious, namely:

- Intrusion on the curtilage of the six heritage listed items
- Height, bulk, scale, and setback
- Landscaping
- Construction
- Traffic, parking and pedestrian safety
- Social benefit to the community

1.0 HERITAGE

Following the successful 2-year campaign initiated by the Cremorne Conservation Group, the six cottages at 78-88 Parraween Street were registered on the North Sydney heritage list in May 2024. The protection of these heritage items by the proponent is now acknowledged, albeit for their streetscape appearance only.



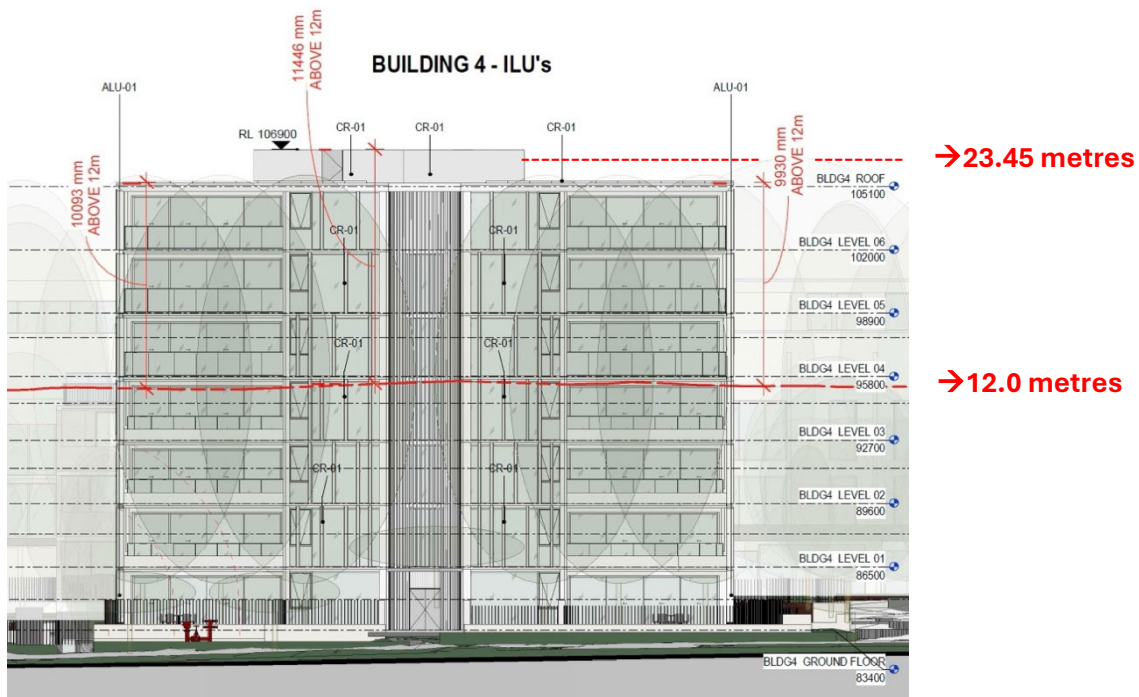
Montage of 4 of the 6 heritage cottages, the RACF and Building 2.

The erection of the 4-storey RACF immediately behind the six cottages, and the adjacent 4-storey ILU Building 2 are imposing modern structures that detrimentally affect the streetscape character and significance of the heritage listed items. The Pathways buildings are excessive in bulk and scale, dwarfing the single storey turn-of-the-century federation cottages.

2.0 HEIGHT, SCALE, SETBACK

2.1 Height

The height of Building 4 ILU grossly exceeds the height limits permitted under the Housing SEPP 2021 (Seniors) in R4 zones, which is set at a maximum building height of 12m. At 23.45 metres, ILU Building 4 exceeds the Housing SEPP (Seniors) maximum height control by more than 95%.



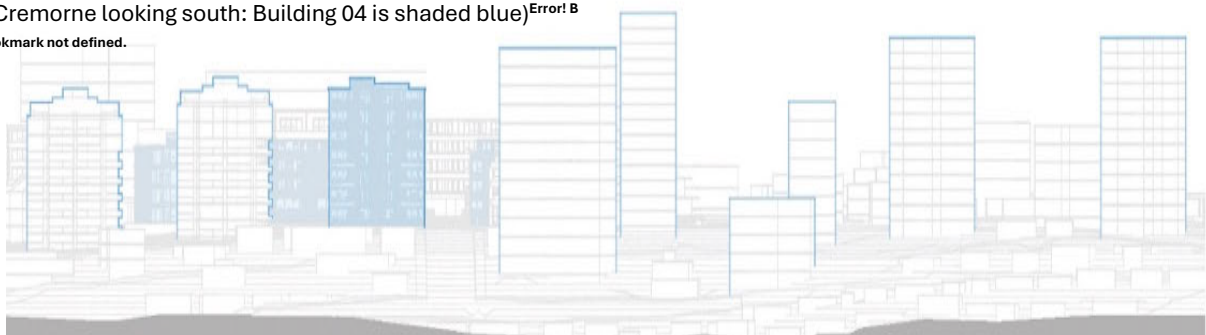
Adhering to building heights controls for Seniors Housing ensures the health and wellbeing of residents is always paramount. In the event of a power outage, fire or other serious event, residents with mobility or cognitive issues on Levels 04, 05 and 06 would find evacuating these levels via stairwells very difficult, if not impossible. Further, first responders, fire, and medical services would have difficulty evacuating residents from the 11 units on these floors. In foreseeing these events, the height of Building 04 should be reduced to the 12m maximum height as directed by the Housing SEPP 2021 (Seniors).

2.2 Scale

The report states (*Building 4*) design takes into consideration the scale and character of nearby apartment complexes... that respects the built form of its two immediate neighbours to the east. Further, the statement *building 04 sits comfortably within the range of heights of the taller buildings in the area* is misleading.

The existing high-rise developments shown below were constructed during 1960-1970s when the now-redundant LEP controls permitted such heights. These structures would not be permitted under current LEP controls. ILU Building 4 is excessive in scale and does not conform to the desired future character of the area.

(Cremorne looking south: Building 04 is shaded blue)^{Error! B}
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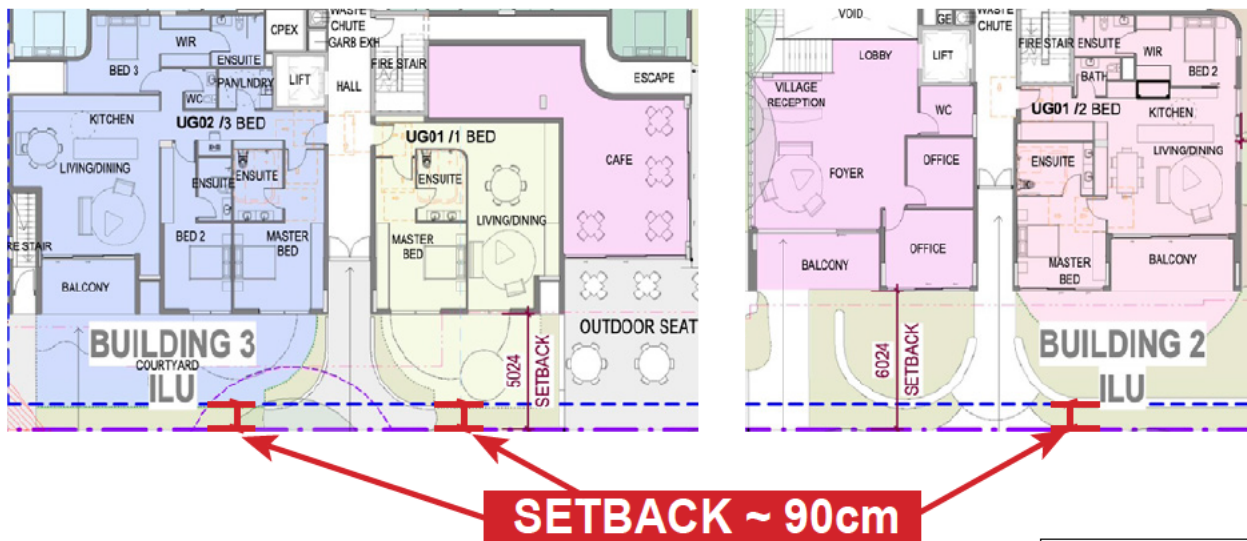
2.3 Setback

2.3.1 Building 1 RACF

Building 1 (RACF) does not have a visible setback from the six heritage listed items and the RACF. Virtually no curtilage remains across the six sites. The heritage significance of the listed items is greatly depreciated by the structures immediately behind them. Further the aged care residents in the adapted reuse cottages receive zero solar access for during winter.

2.3.1 Building 2 and 3 ILUs

The existing building line of both turn-of-the-century dwellings and modern apartment buildings along the north side of Parraween Street retains a 6-7 metre setback to incorporate front yards (ie there are no balconies beyond the building line on the ground floor). Disappointingly, with the removal of the 8th floor of Building 4, the amended plans replaced the federation style Parraween streetscape, that the proponent argued was important for the local community, with modern structures. The ground floor units of Building 2 and 3 now have very small 90cm setback from the footpath to the boundary of an enclosed balcony wall.



The North Sydney DCP 2013 states *residential development respects and maintains existing characteristic built form with buildings setback from all boundaries and landscaped front gardens.*

The Australian Design Guide (ADG) 2.0 Controls Aims support the above DCP control, stating that developments *provide space that can contribute to the landscape character of the street... assisting in achieving visual privacy to apartments from the street.*

At the Public Meeting 5 March 2025, Ms Christy from Gyde Consulting stated (Transcript P-21 [5]) that *on the ground floor there's private open space within the front yard ... there might be a little fence but that's their private open space.* This is a matter of semantics.

The plans (above) clearly show the outline of balconies, and the report table above identifies the area of balconies, not open space.

Nevertheless Ms Christy's statement confirms the ADG design criteria objectives 4E-1 for spaces on units at ground level, which states *a private open space (be) provided instead of a balcony. It must have a minimum area of 15m² and a minimum depth of 3m ... (and that) Balcony use may be limited in some proposals ... eg: close proximity to road, rail or other noise sources.* (emphasis added). The balcony areas are also less than ADG criteria as the occupants will not be able to access the 'open space' beyond the balcony fence.

The plans clearly depict the spaces as balconies on the ground floor units of Building 2 and 3, and therefore do not conform with the ADG nor the DCP, and is contrary to the statement from Ms Christy, Gyde Consulting. Under these circumstances the proposed 90cm balcony setback is unacceptable. If approved, the residents of those units, and the community, will be negatively impacted with issues around privacy, noise and security. Balconies should conform to the controls and ADG design criteria, and be at least 5 metres from the footpath integrated into the building line setback.

Seniors Housing SEPP Balconies		
Unit Number	Balcony Area	2 Hr Solar Access
S2		
U101	14 m ²	No
U102	18 m ²	Yes
U103	17 m ²	Yes
U104	12 m ²	Yes
U201	21 m ²	Yes
U202	21 m ²	No
U203	13 m ²	Yes
U204	12 m ²	Yes
U301	16 m ²	Yes
U302	19 m ²	Yes
UG01	37 m ²	No
UG02	28 m ²	Yes
UG03	31 m ²	Yes
S3		
U101	13 m ²	Yes
U102	18 m ²	No
U103	17 m ²	Yes
U104	15 m ²	Yes
U105	13 m ²	Yes
U201	14 m ²	No
U202	14 m ²	Yes
U203	13 m ²	Yes

2.3.3 Building 4 ILU

Further, the southwest corner of Building 4 does not have any set back from the 'invisible' boundary from Building 2, resulting in just a 6m metre separation between Building 2 and this 'invisible' boundary. With the proposed height of Building 4 at 23.45m, a 6m separation creates overshadowing on Building 2, resulting in Building 2 residents in the northwest corner receiving less than 1 hour sunlight during winter.

2.4 Habitable Rooms

Habitable rooms ... *should not be located more than 1m below ground level (existing) for more than 50% of the room's floor area.*

The entire dining room floor area in basement 01 is located below ground level and therefore does not conform to planning controls. The location of the dining area should comply with the definition of a habitable room.



2 ROOM AREA-BASEMENT 01
SCALE 1 : 500

Architectural Drawings Compilation 7 of 14

3.0 ACCOUSTICS

3.1 Air conditioners

Condenser units are planned for roof installation. This creates a problem with noise for the residents in neighbouring buildings. Similar placement of condensers on the roof of Pathways Northbridge has created an issue with clearly audible night time noise which has disturbed sleep quality of nearby residents in Baringa Road. The report specifies screening but does not outline any mitigation measures to reduce the noise of the condensers.

3.2 Driveway Noise

The report does not outline mitigation measures to reduce the noise of vehicles accessing the underground carpark of the facility. Mitigation measures to reduce noise need to be specified so residents on the west side of Building 3 and neighbouring residents in Paling St adjacent to the driveway, and have adequate cross ventilation for wellbeing and peaceful enjoyment of their units.

4.0 LANDSCAPING

4.1 Through-site link

The report suggests that the through-site will *provide much needed space for socializing, picnics, kids play and finally a memorable place for gatherings.* This through-site will primarily be used as a pedestrian link between 2 busy streets – Gerard and Parraween. It will likely be used by people on bikes and scooters, posing a problem for elderly residents who cannot dodge or move quickly out of the way, particularly in the narrow 1.5–2m wide sections.

The SIA states Pathways, by providing the walkway, *provides a significant positive impact for the community.* But due to its design, it's primarily a walkway provided for the benefit of Pathways residents in Building 04.



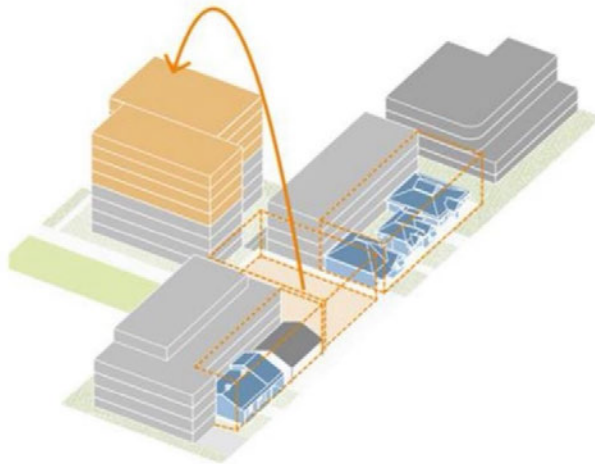
However, the through-site link at the Parraween St end (as shown in the image) is a hard surface area with hard seating, without a tree canopy to provide shade nor appropriate cover from the elements.

In a street where parking is at a premium, where will the public, who use this outdoor area, park? Will basement parking be made available for the public use? It is noted that no visitor parking is proposed.

Conditions of Consent require an easement, there's no guarantee it will remain open for 24-hour public access in perpetuity.

Further, NSW Land Registry Services states that *an easement may be cancelled, pursuant to s47(6A) Real Property Act 1900, by the proprietor of the dominant tenement.*

The width and length of the through-site link is given as the reason for the 23.45m height of Building 4.



The 2023 report stated that if Building 4 was reduced in height to 12m, then an additional building will be built in the space between Buildings 2 and 3 to compensate for the loss in floor space. That statement may be construed as a 'threat' to encourage agreement to the proposed 23.45m height.

The image (left) provided with that report shows the position of a 5th building. [In reducing Building 4 by one level, the amended plans shows infills at the front of Buildings 2 and 3, which has resulted in balconies in the front yards and reduction in the setbacks: see point 2.3.1]

A 5th building would not be approved under current planning instruments which control separation and articulation of the lots on Parraween Street. Importantly, Pathways residents in Building 4 would lose direct access to Parraween Street, which was given as a stated objective by for the through-site by Chrofi architects at the community consultation meeting held in February 2023.

4.2 Plantings

The report outlines designs for an 'instant' garden with the planting of many mature trees in 100mm pots in just 1 metre of 'deep' soil in the through-site link. While 'instant' mature gardens are great, they take some years to establish, requiring regular care. However, with minimal deep soil on the site, except around the perimeter of the development, the long-term viability of mature new tree plantings remains doubtful.

It is deeply concerning that maintenance of the landscaping is conditional for only 12 months. A long-term landscaping contract for regular maintenance, soil regeneration and plant replacement is required.

4.3 Soil analysis

There is no record in the report that a soil analysis will be completed to detect the presence of destructive pathogens, such as *Phytophthora* or *Armillaria*, before demolition begins. These are soil-borne pathogens that cause root rot and can potentially kill trees, including vulnerable new tree plantings. When moving soil around the site or transplanting trees and shrubs, these actions can spread the fungus around the site. A soil analysis should be mandatory before works start.

5.0 SOLAR ACCESS

North Sydney Council's Environmental Criteria of the Waters Neighbourhood in the North Cremorne Planning Area states that good sunlight be available to both public and private spaces.

The through-site will have limited solar access during winter months, making this a cold, windy and uninviting area for residents and the public. Also, no provision has been made for shade from the summer sun and heat throughout the day, nor overhead cover from rain. The through-site link will not be an inviting *public plaza* space for residents and locals unless these considerations are addressed and included in the design.

As mentioned in Section 2.3, there is limited winter solar access to units in the north west corner of Building 2.

6.0 CONSTRUCTION

6.1 Hours

The report states that *Construction, including the delivery of materials or machinery to and from the site, may only be carried out between the following hours:*

- *between 7am and 6pm Monday to Friday inclusive; and (77 hours / week)*
- *between 8am and 1pm, Saturdays. (5 hours)"*

A total of 82 hours / week.

Activities may be undertaken outside of these hours if required... for the delivery of vehicles, plant or materials to and from the site. Site activity may therefore continue for more than 82 hours/week.

These worksite hours equate to more than double the length of a normal working week. This will have direct impacts on locals with increases in noise and traffic in a busy suburban street.

It is particularly concerning that no timeline for construction works is provided in the report. On a best-case scenario, as advised by a construction industry expert, is that the works will take a minimum 24-36 months. It will likely be longer if delays are experienced, due to weather, sourcing materials and labour, and construction certificates, as has been acknowledged by the proponent.

6.2 Noise

Rock breaking, rock hammering, sheet piling, pile driving and similar activities may only be carried out between the following hours:

- *9am to 12pm, Monday to Friday;*
- *2pm to 5pm Monday to Friday; and*
- *9am to 12pm, Saturday*

The original report states this work was estimated to take 8 months, but likely to take longer.

The duration and decibel rating from these earthworks has not been detailed. Further, there is significant noise associated with the dumping of earthworks into haulage trucks. Without this information, it is not possible to assess the impact of noise on the lives of local residents, including importantly those who work from home which significantly increased during and since Covid-19. Mitigation measures for noise abatement are not included in the report.

6.3 Construction Stages

The report does not provide details of a construction management plan. In the original 2023 report, duration of construction stages were given in the table shown below.

TABLE 1: DURATION OF CONSTRUCTION STAGES

Activity	Duration
Demolition & Excavation	8 months
Structure	12 months which overlaps with 5 months of the excavation
Fit out	8 months which overlaps with the 7 months of structure
Total	16 months

This timeframe is indicative only and can possibly change due to delays, weather and construction certification details.

However, this is misleading. The time overlaps between the construction stages is questionable at best. For example, only one month is allowed to finish fitout of all buildings after construction of all structures has been completed. The standard industry rule of thumb is a minimum 6 months to complete fitout.

Construction stages must be realistic and acknowledge that it is not possible to overlap these stages, as proposed, to truncate the total duration of construction for the project to 16 months. Mr Skerritt stated at the Public Meeting on 5 March that *If the development is approved, we'd engage with a range of builders ... and one of the key criteria will be that 18 months ... we're confident we can find a builder that we can work with s=who will build this in the required timeframe.*

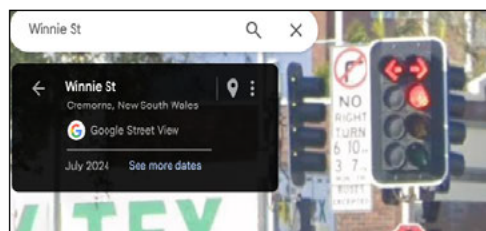
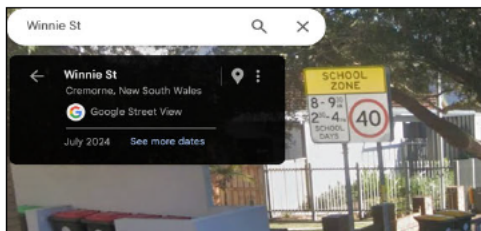
No major construction in Sydney over the past 5 years has been able to demonstrate a turnaround timeline that fast from demolition to completion of fit out. This is simply not realistic for the reasons given above.

7.0 TRAFFIC, PARKING AND PEDESTRIANS

7.1 Construction Traffic

The 2023 report noted *heavy vehicular traffic would occur around 7am and 3-5pm*, adding *does not typically coincide with either heavy construction vehicular traffic or commuter traffic peak hours*. This is not correct.

Parraween Street and Winnie Street are congested with traffic during these hours, due to the location of *Redlands High School* campus on Winnie Street and the childcare centre *Only About Children Cremorne* (open 7am -6pm) at 19 Parraween Street. Parraween Street is also a notorious rat run for locals navigating the backs streets of Mosman and Cremorne.



Peak hour occurs between 6:00am-10:00am and 3:00pm-7:00pm Mon-Fri when it is illegal to make a right-hand turn from Winnie Street into Military Road.

Construction vehicles must turn right into Winnie Street, then left into Gerard Street. This will be very a difficult turn for a truck & dog tray with heavy east/west traffic approaching Gerard intersection from both directions.

The report notes these hours will also coincide with the arrival and departure of construction workers. The report states that *carpooling (will be encouraged) amongst construction staff as well as the use of public transport*. Applaudable, but highly unlikely given that the only public transport to the site is by bus. Workers are likely to travel long distances to the site given less than 8% of construction workers reside in the 8 councils that

form the Northern Sydney Regional Organisation of Councils, and less than 1% live in North Sydney. Private vehicles will most likely be the preferred mode of transport given most workers will be coming from the south and west of Sydney. Where will these workers, numbering up to 150 on site per day, park?

The original report noted 19m length truck / dog and 19-20m articulated vehicles will access Parraween Street with between 6-30 trucks per hour being for concrete pours.

TABLE 3: EXPECTED CONSTRUCTION TRAFFIC

Stage	Number of Trucks	Largest Truck
Demolition	6 x waste collection vehicles per day	19m length Truck and Dog
Excavation	15 x construction vehicle per day 1 x waste collection vehicles per day	19m length Truck and Dog & 19m-20m length Articulated Vehicle
Structure	5 x construction vehicles per day 2 x waste collection vehicle per day	
Fitout	10 x construction vehicles per day 2 x waste collection vehicle per day	
Concrete Pours	Peak of 30 x concrete trucks per pour (typically maximum 6 concrete trucks per hour); A total of 20 major concrete pours	

No details are provided regarding estimated total number of hours of construction traffic for each stage of construction, eg. concrete pours which start in the early morning and take a long time to complete.

The amended report does not provide details about construction traffic stating *expected generated construction traffic is relatively low and is not expected to ... adversely impact the surrounding road network performance. Haulage routes will maximise the use of... Military Road.*

At the beginning of the first paragraph of this section, the Military Road turn is illegal on weekday mornings and afternoons. Has the movement of 19m trucks in and out of Parraween, Winnie and Gerard Streets been considered, given the need for a safe turning circle to prevent damage to council property and private property?

7.2 Street Traffic

During peak hours, Parraween Street is a recognised 'rat run' between MacPherson Street and Winnie Street. In fact, Council identified a need for traffic calming scheme in the 2019 LATM Action Plan.

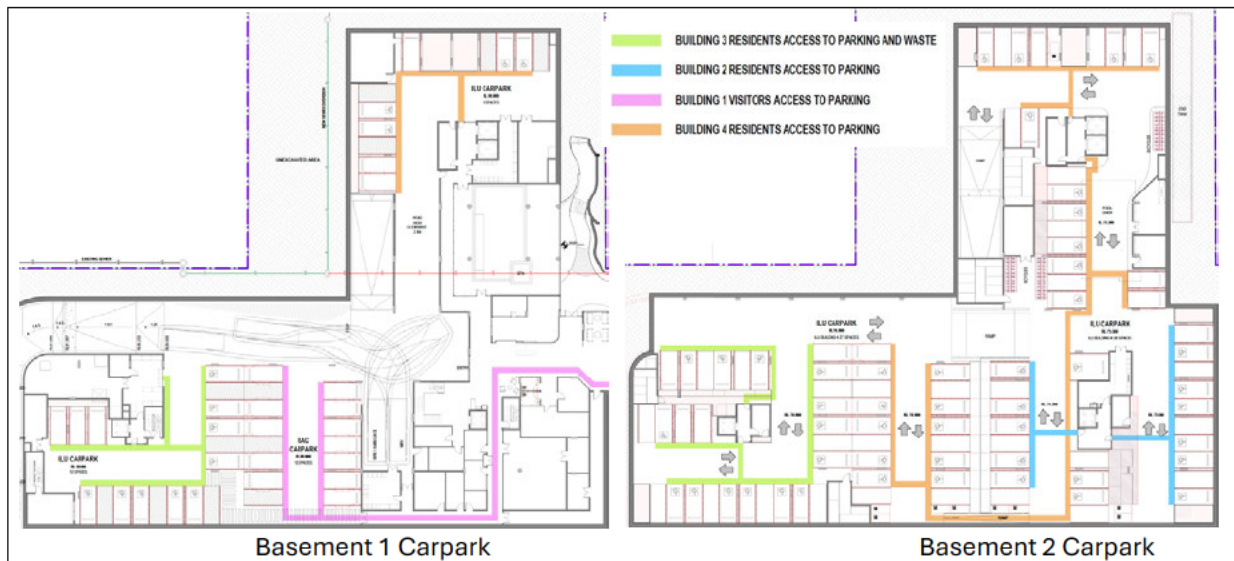
Parraween Street currently accommodates at least 500 private car spaces which will increase as further private development takes place. Council's Parraween Street public car park at the eastern end of the street will increase spaces from 63 to 161 after Council's approved upgrade and construction of a new childcare centre, affordable housing development and pocket park is completed.

The amended report includes plans to increase the number of car spaces on the site from 20 to 89 – a 445% increase. In addition, there will be ambulances and facility vehicles accessing the site, including but not limited to medical and administration staff, garbage trucks, linen services, and medical supplies with the 2023 report citing heavy vehicle access would be 11-13 times per week, or approx. twice per day.

The Council's 2019 traffic assessment report on Parraween Street traffic volume was around 2000 vehicles per day. The uplift in mixed use development has increased vehicular movement on the street since then. The Parraween Street 'rat run' between MacPherson Street and Winnie Street will be exacerbated during and after construction. The cumulative effect of increased traffic congestion from future developments along Parraween Street and surrounding areas is not considered. These issues are not adequately addressed in the report.

7.3 Underground Parking

Eighty-nine underground car spaces are allocated for residents and staff (77 x ILU residents; 3 x RACF residents; 8 x RACF staff) plus an ambulance bay. Sixty of the 80 resident spaces are marked with a disabled icon, with minimum width dimensions of 3200mm, meeting AS2890.6:2022 for people with disability. The standards also require disabled car spaces to have an adjacent shared area.



Australian Standard AS2890.6:2022 indicates shared areas adjacent to a disabled parking space must not be less than 1600mm wide. The report highlighted 42 shared areas with red shaded diagonal markings. These shared spaces are the same width as the disabled car spots, i.e. 3200mm wide. The report does not guarantee that the shared spaces will not be converted to car spaces and consequently eliminating some of the disabled car spaces. This would have the undesirable result of less parking for residents with disability, as well as add additional cars accessing Parraween Street. There are concerns that shared spaces may be re-allocated as parking spaces (post approval) and potential impacts any such alterations - in use or numbers - might have in decreasing residential amenity and increasing traffic flows. These aspects are not currently assessed in the report's traffic study.

Visitor parking has been included in the plans. While the Gyde Consultant stated at the Public Meeting on 5 March that car spaces allocated to the RACF building may be used for visitor spaces, the *Green Travel Plan* encourages visitors to use public transport, cycle or walk. The verbal statement is not compatible with the report statement. Public transport for visitors is not practical nor feasible, and may have the undesirable effect of reducing visitations to residents. Adequate number of visitor spaces need to be clearly designated and made permanent.

7.4. Pedestrians

The report discusses pedestrians only in relation to their use of Gerard St, Parraween St and the proposed throughway. The report also states that seniors and people with a disability living in the ILU buildings will access shops, services and public transport. These amenities are located on the south side of Military Road and therefore must be crossed by the ILU residents.

Having accessed the most direct routed through the Don Adan arcade, Pathways residents will invariably cross at the pedestrian lights at 362 Military Road, adjacent to Chambers Cellars (noting there is no pedestrian crossing on Parraween Street between the through-site and the Don Adan arcade, and Council is opposed to adding a third crossing within a few hundred metres of the existing crossings).



It is understood that approval of this development is based on the strategic and site specific merits of the project and therefore the actions of senior residential pedestrians is outside its jurisdiction.

Nevertheless, I draw attention to the fact that Military Road, a major six lane state highway that runs parallel to Parraween Street, carries in excess of 75,000 vehicles a day ([NSW traffic volume](#)).

The pedestrian light located at 362 Military Road, Cremorne is green for 18 seconds and blinks red for another 9 seconds. (On average, it takes an able bodied pedestrian 5.8 seconds to cross a two lane road ([TfNSW](#)) or 18 seconds to cross a 6 lane road). It is difficult for a person with a disability to cross Military Road safely within the space of time allowed by the pedestrian lights.

Below are quotes from two local residents highlighting their difficulty with crossing Military Road

I am 85 years old and, being vision -impaired I walk with a Guide Dogs white stick. I find that the time allocated for pedestrians to cross Military Road at the above intersection is insufficient and I would appreciate your making representations to the appropriate authorities to have it increased.
(Local resident, Hampden Ave, Cremorne)

Dear Sirs, I am 88 years old and walk with the aid of a stick. I am still able to go out each day to shop and to catch buses, but experience difficulty in crossing Military Road, especially at the corner of Winnie Street (to catch buses), as well as further along towards Spofforth Street (to shop etc.), for the traffic lights change very quickly, in favour of vehicular traffic, making it difficult for pedestrians to complete crossing. I wonder if anyone has taken this into consideration for residents of the proposed Aged Housing, who may well wish to shop or catch buses?
(Local Resident, Murdock St, Cremorne)

The length of time allowed to cross this highway is set for able bodied pedestrians. There is a high probability that Pathways residents may experience a disability. This crossing time needs addressing before a serious road accident occurs.

8.0 SOCIAL IMPACT ASSESSMENT

Given the design and planning of this development it appears obvious that it will be providing high-end luxury living for older people. Unfortunately, there does not appear to be any 'pathway' for less wealthy residents who live in the area to be able to afford a unit in the complex. Can this be addressed?

Regarding the Social Impact Statement as it relates to the community, the proposal asserts that Pathways provides a significant positive impact for the community with minimal negative impacts. It achieves this by incorporating a public park.

The concept of a public park is welcomed, however what is proposed as a public park, (or green space) is in fact a throughway primarily designed for the benefit of the ILU residents of Building 4 to have convenient

access to shops, services and public transport. This space, as currently designed, is unlikely to be used by the community for the reasons previously stated in this submission.

RECOMMENDATIONS

In reviewing the documents supporting the development application for Pathways Cremorne, and if approval is granted, I ask that the Independent Planning Commission consider incorporating the following points into amended Conditions of Consent:

Structure

1. Reduce the height of Building 4 to 12m height in line with the Housing SEPP 2021 (Seniors).
2. Incorporate setbacks on Floors 3 and 4 of the RACF and the east side of Building 2 to reduce bulk and scale of the streetscape behind/ beside the six cottages. These setbacks will improve solar access and ventilation to the north and west side of the adapted reuse cottages.
3. Move the setback of the bounded balconies on the Parraween Street ground floor units of Building 2 and 3 to at least 5 metres.

Acoustics

4. Soundproof aircon units on the roof area such that the decibel rating does not exceed 4-5 dB.
5. Propose mitigation measures to reduce noise from heavy vehicles disturbing Building 3 residents in UG 01 and adjacent neighbours in No.1 Paling Street.

Landscaping

6. Require soil testing around the site before replanting existing plants and any new plantings.
7. Plant young trees to allow roots to establish providing a healthier garden over the long term
8. To make the throughway a desirable area for residents and community to enjoy:
 - Incorporate man-made shade (given lack of deep soil) and provide appropriate cover from the elements at the Parraween St end.
 - Make outdoor seating comfortable for seniors and people with disability by incorporating side arms, backs to seats and rounded bases.
9. Contract a landscaping company employing a qualified horticulturalist (that does not subcontract) to undertake regular garden maintenance and replant when necessary.
10. Conditions of Consent must cover ongoing maintenance, (not 12 months as currently specified), to ensure the gardens and public throughway remain thriving healthy spaces.
11. Include a caveat on the easement instrument that prevents registration of a cancellation of the easement by the proprietor of the land, which will ensure the throughway site remains open 24/7 in perpetuity for public use.

Construction, Traffic, Parking, Pedestrians

12. Prior to the Construction Certificate for demolition, the applicant is to appoint an independent traffic engineer to peer review the applicant's construction, traffic, parking and pedestrian reports to:
 - Provide a rigorous and diligent traffic management plan which includes realistic timelines for stages of construction, mapping the route of heavy vehicle haulage, detailing expected construction vehicle numbers and cumulative effect of vehicles on street traffic, including from workers on site.
 - The Independent Certifier to be held to account that the reviewed reports and traffic management plan is followed.
13. Reduce the width of the shared spaces in the car park to 1600mm and increase the width of the car spaces specified for disabled drivers by an extra 800mm each.
 - Alternatively install permanently fixed bollards in the shared space areas, which are to be regularly checked and certified for placement and safety.
14. Include an allocation of spaces for on-site visitor parking.
15. Assessment and mitigation recommendations of the accident risk to seniors with disability when crossing Military Road, which would benefit both Pathways and local residents

Social Benefit

If Building 4 is approved with the height proposed in the plans, amended Conditions of Consent are sought for provision of absolute tangible social benefits for both residents and public. These benefits include:

16. Replace the pool with a hydrotherapy pool.
17. Allow public access to the hydrotherapy pool with a referral from their GP.
18. That pool usage is overseen by a qualified rehabilitation therapist.
19. Insist the pool design has adequate and safe entry / exit points for users with a disability.
20. Siting the change rooms beside the pool so that pool users do not walk past the hair/beauty salon.
21. Allocate on-site public parking in the basement for users of the pool.
22. Convert UG01 adjacent to the proposed café in Building 3 into a meeting room for indoor social activities for Pathways residents, e.g. board games, bingo, tai chi, library.
23. Permit the public to use this meeting room, such permission to be regulated by a committee comprising a representative from Council, Pathways and the Community which would review/approve/reject requests for such use.
24. Move the overhead telegraph cables underground along the width of the site on Parraween Street which would enhance the outlook for Pathways residents and provide a permanent public benefit to the community. This would provide a REAL social benefit to all parties in perpetuity.

SUMMARY

Provision of good quality aged care has been identified as a need to allow older residents to age in place. Pathways could be a highly desirable development for these people, albeit those in a top tier wealth bracket.

The Cremorne Conservation Group supports the submissions from the North Sydney Council, the Brightmore Precinct and the residents in nearby strata.

We remain optimistic that, with due and proper review of the issues outlined in this submission, including their ramifications on other aspects of the development and the neighbourhood, with thoughtful consideration given to the recommendations we have made, the Pathways development will be both sensible and beneficial for the proprietor, Pathways residents, and the general public.

Yours faithfully,



Fiona Gracie

Founder

Cremorne Conservation Group

