

Memo

Development Assessment

To: Northern Beaches Local Planning Panel

Cc: Peter Robinson
Executive Manager Development Assessment

From: Jordan Davies
Town Planner

Date: 1 June 2021

Subject: Item 3.3 - Additional information and response from applicant to assessment report for DA2021/0311 Construction of a boarding house at 2 The Circle, Narrabeena

Record Number: Insert Record Number here

Dear Panel,

On 1 June 2021 (at 3:30pm) the following additional information was submitted to Council in regards to the assessment of DA2021/0311 for the Construction of a Boarding House at 2 The Circle, Narrabeena. The following information was submitted:

1. Letter from BBF Town planners – Responding the reasons for refusal within the Council assessment report.
2. Updated Architectural Plan DA03 (Ground Floor Plan) and DA05 (South Elevation) prepared by MCK Architects.
3. Letter from Transport and Traffic Planning Services
4. Swept path diagrams

This information has subsequently been forwarded to the Panel for their consideration.

The purpose of this memo is to advise the Panel of Council's position following review of the information and to advise if any of the reasons for refusal are resolved as a result. The information has been forwarded to Council's Waste Team, Development Engineers and Traffic Team for consideration.

Council's traffic engineers have reviewed the submitted passing bay and swept path diagrams. The passing bay has been proposed partially within the subject site and partially within the road reserve, as well as a clearance of 1m to the drainage lintel. Council's traffic team are satisfied with this arrangement and therefore, reason for refusal No. 2 could be resolved.

At this stage, no response has been received by the development engineers in relation to reasons for refusal No.3 and No.4. This is not to say that the information is not capable of resolving these two reasons for refusal, however there has been insufficient

time for Council's relevant referral bodies to consider and respond to the additional information.

In regards to the issue of site suitability and access to a bus stop (reasons for refusal No.1, No. 5 and No.6) Council's planner has reviewed the additional information and responses provided by the applicant. Of note, the applicant has cited additional case law which deals with the construction of a boarding house at 22 Ramsay Street, Collaroy and if this development site meets the definition of 'accessible area' under the SEPPARH. This relevant case being *Hu V Northern Beaches Council [2020] NSWLEC 1525*. This judgement and applicant's response has been considered by Council's planner.

The judgement *Hu V Northern Beaches Council [2020] NSWLEC 1525* considered if the proposed boarding house at 22 Ramsay Street was located within the 'accessible area' as defined by the SEPPARH. The particular contention of the Council was that the gradient of the pathway accessing the bus stop within 400m was too steep and therefore did not constitute a pathway that could be 'safely walked by a pedestrian' as required by the SEPPARH. Furthermore, the Council contended that a bus stop was only available in a northbound direction within 400m of the site and access to a bus stop in a southbound direction was in excess of 400m, and therefore outside of the accessible area not providing access to a bus service in both directions.

The judgement handed down by Commissioner Grey found that the issue of pathway gradient and a bus stop not being within 400m for both a northbound and southbound direction did not mean the development site was outside the 'accessible area' as defined by the SEPPARH. The appeal was subsequently upheld and consent granted by the court in this case. However, in this particular circumstance the route relied upon for access to the bus stop was via an existing public footpath (although at a steep gradient). This judgement did not deal with the issue of a route that required residents of the boarding house to traverse a grassy, unlit public reserve, which poses different challenges with regards to pedestrian safety, practicality and accessibility.

Therefore, whilst the above judgement does deal with the consideration of the 'accessible area' as defined by the SEPPARH, there are differences between each particular circumstances that means the direct application of Commissioner Grey's findings would not resolve Council's issue of site suitability in the current development application before Council.

Council still finds the site to be outside the 'accessible area' as defined by the SEPPARH and relies upon the findings the judgement *Mckavanagh v Northern Beaches Council [2020] NSWLEC 1662* as cited in the assessment report which concludes that a boarding house development should provide a 'high level of access' due to the nature of the development which is heavily reliant on access to public transport.

Therefore, upon consideration of the additional information provided by the applicant, Council maintains the recommendation of refusal and reasons No.1, No.5 and No.6 with regards to site suitability and access to a bus stop.



Jordan Davies – Town Planner

1 June 2020

The Chief Executive Officer
Northern Beaches Council

2 THE CIRCLE, NARRAWEENA – DA2021/0311
PROPOSED: NEW GENERATION BOARDING HOUSE - ITEM 3.3, 2 JUNE 2021
SUBMISSION TO THE NORTHERN BEACHES LOCAL PLANNING PANEL

This submission responds to the issues raised and reasons of refusal within the assessment report relating to the subject site/item/DA.

There is one determinative issue in this DA which is whether this site is within an accessible area as defined by State Environmental Planning Policy Affordable Rental Housing (SEPP ARH). The applicant relies on the high amenity parkland adjoining the site to walk 324m to the bus stop McIntosh Rd (figure 1). Council's position is that the site is not within an accessible area. This is based on the view that the park adjoining the northern and western boundaries of the site cannot be relied upon to satisfy the SEPP ARH's definition of 'walking distance'.

Matters of lesser significance are addressed in two revised plans that accompany the submission (addressed in Section 5). If the Panel is of a mind to support the DA, these matters may form conditions of an approval. Alternatively, they may form deferred commencement conditions.

The applicant would be grateful to the Planning Panel for its consideration of the submission.

1 Overview - definitions and locational characteristics

1. The public reserve adjoins the north and west of the site provides significant amenity, and via the site's northern boundary, facilitates pedestrian access to nearby bus stops and local facilities.
2. The public reserve is known as Beverley Job Park and comprises a developed recreational area of approximately 5 hectares. It is zoned RE1 public recreation and comprises playing fields, tennis courts, children's playground, amenities buildings, informal recreation areas, off leash dog area, picnic tables, various stands of established trees, mainly around the park perimeter, but also along a corridor separating the 2 playing fields. The areas within the park comprise a mix of maintained turfed parkland, 2 car parking areas and some concrete pedestrian pathways. The park benefits from sportsfield lighting which is authorised to be used until 9:30 PM.
3. The site is accessible to two bus stops on McIntosh Road:
 - One is located approximately 324m from the site (bus stop adjacent to the north side of the tennis courts, as shown in figure 1; and
 - The other is located 336m from the site (bus stop near the intersection of McIntosh Victor Roads) as shown in figure 2.
4. The Narraweena Neighbourhood Centre (Zone B1) is a shopping centre that is approximately 490m walking distance to the north west of the site.

2 Permissible and no jurisdictional threshold

5. SEPP ARH, Clause 27, and the associated definitions of *accessible area* and *walking distance* are not a development standard.
6. The statutory effect of clause 27 is that clauses 29, 30, and 30A of SEPP ARH do not apply. The proposed development remains permissible under both SEPP ARH and the LEP because boarding houses are permissible within the R2 zone. Whichever view the panel takes regarding the accessible area, there is no jurisdictional issue in assessing the location of the proposal and its suitability.
7. Clause 27(2) states:

(2) Despite subclause (1), clauses 29, 30 and 30A do not apply to development on land within Zone R2 Low Density Residential or within a land use zone that is equivalent to that zone in the Greater Sydney region unless the land is within an accessible area.
8. The development remains permissible under both the LEP and the SEPP ARH. This is confirmed in the matter of *Hu v Northern Beaches Council* [2020] NSWLEC 1525 (Hu), at 44 Gray C states: *I am required to decide whether the site is within an “accessible area” in order to determine the applicable planning controls. As set out above, if the site is within an accessible area, clauses 29, 30 and 30A of the SEPP ARH apply, which set out the “must not refuse” criteria (cl 29), the minimum development standards (cl 30), and a requirement to consider the compatibility of the proposed development with the character of the local area (cl 30A). If the site is not within an accessible area, then those clauses need not be considered, but an assessment will be required to be made as to the adequacy of the landscaped open space against the requirements of the WDCP 2011.*
9. In the matter of *Sales Search Pty Ltd v The Hills Shire Council* [2013] NSWLEC 1052 involving R2 zoned land for a boarding house, the Commissioner also found that the site not being within an accessible area did not bear on the decision to grant consent. At [85] of the judgment Commissioner Morris states *‘For the reasons outline above, I find that the site is not within an accessible area for the purposes of clause 4 of the amending SEPPARH. Such finding however has no bearing on my decision that consent should be granted to the application before the Court’.*
10. The development provides a landscaped area of approx. 34% as measured under D1 of the DCP (minimum dimension of areas being 2m) and council’s assessment report supports the proposal on the grounds of it satisfying the objectives of the control. Furthermore, the proposal achieves a high level of compliance with LEP and DCP and would succeed on these assessment grounds. DCP clauses A.5, D18, and D20 relating to access are separately addressed below within Section 4.

3 Site suitability – walking distance and park land

11. Under the heading site suitability, the assessment report states:

‘Council’s position is that the route provided by the applicant to access the bus stop within 400m is not in accordance with the definition of ‘walking distance’ (as defined by the ARHSEPP) as there is no public footpaths through Beverly Job Park...’
12. **Walking distance** is defined in the cl 4 of SEPP ARH and means:

‘the shortest distance between 2 points measured along a route that may be safely walked by a pedestrian using, as far as reasonably practicable, public footpaths and pedestrian crossings’.

13. An **accessible area** is defined in the cl 27 of SEPP ARH as:

accessible area means land that is within—

- (a) 800 metres walking distance of a public entrance to a railway station or a wharf from which a Sydney Ferries ferry service operates, or
 - (b) 400 metres walking distance of a public entrance to a light rail station or, in the case of a light rail station with no entrance, 400 metres walking distance of a platform of the light rail station, or
 - (c) 400 metres walking distance of a bus stop used by a regular bus service (within the meaning of the Passenger Transport Act 1990) that has at least one bus per hour servicing the bus stop between 06.00 and 21.00 each day from Monday to Friday (both days inclusive) and between 08.00 and 18.00 on each Saturday and Sunday.
14. In response, we draw the Panel's attention to the following matters:
15. The definitions of accessible area and walking distance do not require a concrete footpath; do not set standards around the specific aspects of the walking route(s) in relation to path surfaces, widths, gradients, handrails, and the like, in the way that other statutory policies do, for example, SEPP Seniors.
16. In our opinion, accessible area under SEPP ARH provides a more general indicator of the site's appropriateness. The provision is broader in nature, not narrowly focused, and does not set a standard. If higher and more specific requirements for access were needed for boarding houses it would be a development standard in a similar way to SEPP Seniors.
17. Clause 27 does not have the determinative weight that the access provisions within SEPP Seniors has (clause 26) where the site's distance to public transport is a development standard and there are specific requirements set around the gradient of the pathway and its fitness for meeting the specific needs of people with higher mobility needs.
18. Instead, the accessible area requirement establishes *reasonably practicable* (meaning able to be used; useful) within the definition of walking distance as its operative words. The proposed walking distance from the site through the adjoining park land is reasonable, practicable and able to be used due to its physical characteristics such as gradient, turfed and maintained state.
19. The parkland does not detract from the site's accessibility but enhances it. Its level/modest gradient and high amenity are attractive features that encourage and facilitate walking access through it.
20. For these reasons, we respectfully submit that the assessment goes beyond the definitions of *accessible area*, *walking distance* and the purpose of these terms as they relate to the Affordable Rental Housing policy.
21. The proposal is within an accessible area with an appropriate, practicable, walking distance through the adjoining park land.
22. In this instance the suitability of the site's location has several dimensions in addition to its access to bus stops.
- a) The site is highly accessible to regular bus services connecting it to large employment areas within the region, including Dee Why, Brookvale and Frenches Forest (including the North Beaches Hospital).
 - b) The site is within level walking distance of shops, services, childcare, schools, a community centre and high amenity recreational spaces given the parkland setting that the benefits the site.

3.1 Site suitability – broader locational attributes

23. Within its local context (500m) - the site is within the walking catchment of 2 bus stops on McIntosh Rd that are regularly serviced, the neighbourhood centre at the intersection of McIntosh Road and Alfred Street, community centre, child care centre, primary schools (one public and one Catholic) on Alfred Street, recreational facilities within the adjoining park (including children's playground, off leash dog area, picnic tables, two level floodlit playing fields, floodlit tennis courts).
24. Within its local context (1km) - as identified within the Northern Beaches Local Housing Strategy (figures 26 and 27) the site is within 1km of the Dee Why town centre which is the identified radius applied to strategic centres. Dee Why and Brookvale form the major strategic centre serving the region and is a significant employment area. In this regard the 6th aim of the Affordable Rental Housing policy is:

3 Aims of Policy

(f) to support local business centres by providing affordable rental housing for workers close to places of work,

25. The gradient of the land is modest between the site and key facilities including the two regularly serviced bus stops on McIntosh Rd and the neighbourhood centre. There is a level change between:
 - the site and the bus stop on McIntosh (at Figure 1) of approx. 6m providing an overall gradient of approx. 2%
 - the site and the neighbourhood centre of approx. 8m providing an overall gradient of approx. 2%

source: Northern Beaches Council Maps – stormwater layer which has 2 contours
26. Council's Design Sustainability Advisory Panel made the following observations in relation to pedestrian access across the park:

'Public domain: relationship to public domain, safety/security.

Access through the park will provide better connection to public transport. This could be provided by a simple gate in the fence, however the question of whether this provides legal access to satisfy the provision of the SEPP is for Council to determine.

We need to recognise and plan for the way people actually behave, rather than planning for the way we think they should behave. There is little doubt that if there is a short cut to a desirable destination then people will use it.

Recommendations

4. *Provide a gate in the fence to enable easy access through the park'.*

4 Council DCP provisions

27. Councils' assessment report emphasises the importance of the following DCP provisions in determining that the site is unsuitable for a boarding house
 - a. Objective A.5
 - b. D18 accessibility and adaptability
 - c. D20 safety and security
28. The assessment report states the following in relation to the DCP: *The proposed development is inconsistent with the objectives of the Warringah DCP which requires a*

- 'high level of access' to the site of the proposed development and therefore the site is not considered suitable for a boarding house development given the proposed method of access and walking.*
29. *'The Warringah DCP is silent on what is a reasonable distance for access to a bus stop for a boarding house development. However, the most relevant section of the WDCP are the objectives contained in A.5 WDCP which is for development in the LGA 'To provide a high level of access to and within development' and controls D18 and D20 WDCP'.*
 30. In response to these issues the Commissioner at [72] in the matter of *Hu v Northern Beaches Council* [2020] NSWLEC 1525 states:
 - a) *Secondly, a boarding house is a nominated permissible use in the zone, and there is nothing in the definition of "boarding house" or in the WLEP 2011 that requires the public footpath that provides pedestrian access to it to meet any particular standard for disability access. To impose such a requirement and use it as a basis upon which to find that the site is not suitable for the development would be arbitrary, in the same way it would be arbitrary to impose such a requirement on any other permissible use in the zone. The fact that the boarding house contains an accessible room does not create such a requirement, in the same way that other permissible uses are required to provide accessible or adaptable designs without having a requirement with respect to the gradient of pedestrian access along the local public footpath. In any event, as a matter of practicality, it is common ground between the parties that the accessible room can be accessed from the basement car parking along a path of travel that is acceptable to the experts on accessibility. It is also agreed between the parties that within the site all of the requirements of the BCA with respect to disability access are met and the proposal does not breach the requirements of the Disability Discrimination Act 1992 (Cth).*
 31. Council in its assessment report has made reference to the court judgement of *Mckavanagh v Northern Beaches Council* [2020] NSWLEC 1662 relating to 22 Redman Rd Narrabeena. In my opinion this has limited relevance to the subject site given that the two determinative issues were the site's was topographical separation from the Pittwater Road bus corridor by an elevation which relied on 71 steps to traverse, in order to access bus stops greater than 400m away, shops and services. The subject site it is not challenged by topography or the distance between the site and the bus stop when using the park. The walking distance characteristics are not translatable to the subject DA.
 32. The proposed design has appropriately considered accessibility and safety. It satisfies the requirements under the National Construction Code and Building Code of Australia as confirmed in the building code and accessibility report by BCA Logic that accompanies the DA.
 33. In relation to wheelchair access, Council's assessment report states: *Furthermore, no assumptions can be made as to the physical ability of the residents of the boarding house which could be varied and may include a proportion of disabled residents who may require wheelchair access to and from the site.*
 34. Whilst no assumptions can be made, no development standards are set regarding the type of walking path, its gradient, and other specifications that may be needed to meet the needs of residents that may be physically impaired. The following findings of Commissioner Grey in *Hu* supports these views:
 - a) in relation to **gradient** the following observations are made:
 - b) The impact of the pathway gradient at [70] *Within its contention concerning whether the site is in an accessible area, the Council also asserts that the site is*

not suitable for the development in circumstances of the “extraordinarily steep gradient of Ramsay Street” (Ex 1, p 14). The Council contends that this is not a safe walking route having regard to “the prospect that a boarding house may well be occupied by some persons with limited mobility”. Two points can be made with respect to this issue.

- c) *At [71] Firstly, I do not accept that the steep gradient of Ramsay Street causes the site to fall outside of the definition of accessible area in cl 4(1)(c) of the SEPP ARH. There is no requirement, in either the definition of “accessible area” or of “walking distance”, for the “route that may be safely walked” (referred in the definition of “walking distance”) to be of a particular gradient. This is in contrast to cl 26 of the SEPP HSPD, which specifies the required gradients along a pathway from the site to the public transport services. In circumstances where there is no requirement for a particular gradient, I consider that the continuous pedestrian path within the Council’s road reserve from the site to the bus stop is sufficient to constitute a “route that may be safely walked”.*
 - d) *At [73] Accordingly, the pathway gradient along the public footpath on Ramsay Street is of no consequence to the suitability of the site for the development, or to my finding that the site is in an accessible area.*
35. In relation to **car parking**, Council’s assessment report states: ‘given the proposed development site exceeds the walking distance to a bus stop under the SEPPARH development of this site for the purpose of a boarding house in this particular location could create more demand for parking given it is not within an ‘accessible area’ as defined under the SEPPARH’.
36. In response, the following submission was made in the case of Hu at 60: ‘no inferences can be drawn with respect to the likely demographic of residents of the boarding house and their requirements for car parking. In particular, cl 29(2)(e)(iia), which concerns the “must not refuse” criteria for car parking for boarding house development not carried out by a social housing provider, does not reduce the car parking requirement for developments located in an accessible area’.

5 Revised plans

37. The project architects have responded to design matters relating to the waste bin area, the location of stormwater drainage pipes and the driveway width at the entry to allow for the passing of 2 vehicles. Details regarding these matters are provided on the accompanying plans and the following aspects are noted:

Stormwater drainage pipes

38. The drawings have been amended to adjust the location of the proposed driveway 1m away from Council’s stormwater asset to achieve the council’s engineering requirement.
39. The easement is shown on the land survey that accompanies the DA. The proposal has considered this easement within the design, and furthermore has responded to Council’s feedback pertaining to it during the Pre DA. A photograph is provided at figure 6 below showing the concrete plate associated with the drainage line within the neighbouring property at 4 The Circle adjacent to the shared fence-line with the subject site.
40. It is understood that Council’s mapping layer, which conflicts with the survey information, is to be used as a guide rather than as an accurate representation of the pipe’s location. In the interest of resolving this issue, the client is in the process of engaging a suitably

qualified consultant to locate Council's pipe and coordinate with plotting its location on the survey. However, in our opinion this requirement could be a condition of consent or a condition of deferred commencement putting the onus on the applicant to resolve this issue.

Waste bin area

41. The amended drawings address Councils' recommendations by changing the location of the bin store to be adjacent to the length of the pedestrian entry pathway. It is not a 'waste room' so does not need to comply to the recommendations that pertain to a 'room'. The previously labeled 'store' has been removed. The slope is less than 1:8, so complies with Council's gradient. The wall to the bin store has been increased to 1600mm as requested.

Driveway width at the entry

42. Issue: Width of driveway at the entry is to allow for the passing of 2 vehicles.
43. The drawings have been amended to provide a passing bay. The project's traffic expert states as follows:
44. *'I have assessed the proposed modified access driveway which has been requested by Council.*
45. *Despite the fact that AS2890.1 does not require an ability for cars to pass on a driveway connecting to a local access road, the modified driveway provides for cars to pass. AS2890.1 Section 3.2.2 specifies that an access driveway on an arterial or sub-arterial road or where sight distance is restricted on a traffic movement of more than 30 vtp, there should be a passing bay available within the site.*
46. *The subject driveway does not involve any of these circumstances and in reality, a driver waiting to exit will wait at the kerb line and not at the site boundary. The attached swept path diagrams show the circumstances for the proposed modified driveway where a car waits to exit while a car is able to pass to enter and where an entering car waits while a car exits.*
47. *It is my assessment that the proposed modified driveway suitably provides for the Council request avoiding an unnecessary reduction in the landscape area available'.*

6 Conclusion

48. We respectfully submit that the proposal is within an accessible area with an appropriate, practicable, walking distance through the adjoining park land.
49. The site is highly accessible to regular bus services connecting it to employment areas. It is also within level walking distance of shops, services, childcare, schools, a community centre and high amenity recreational spaces given the parkland setting that the benefits the site.

50. The parkland does not detract from the site's accessibility but enhances it. Its level gradient and high amenity are attractive features that encourage and facilitate walking access through it.
51. The Local Planning Panel has the information necessary to approve the application and our assessment finds that it is in the public interest to do so.

Yours sincerely,

Michael Haynes



Director - BBF Town Planners

The following documents accompany this submission:

Architectural Plans by MCK Architects –

52. DA03 Ground Floor Plan

53. DA05 Elevation

54. Letter dated 1 June 2021 from Transport and Traffic Planning Associates

55. Swept path diagram A

56. Swept path diagram B



Figure 1 – The route indicated is assessed as being the most direct walking route comprising ‘comfortable’, flat (for section adjacent to the playing field), to modest gradients and safe walking environment separated from roadways, vehicle access ways and car parking areas within the public recreation reserve

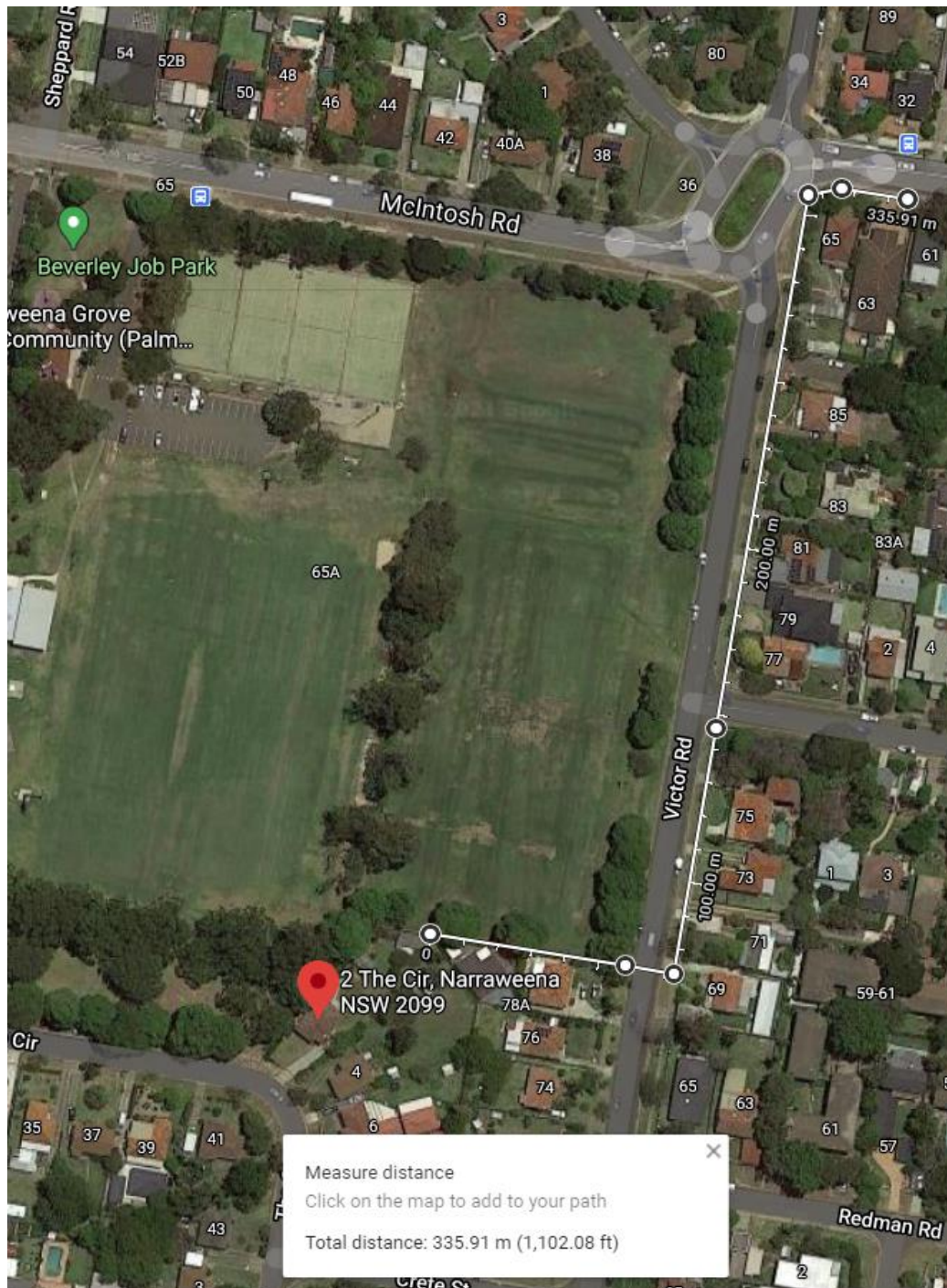


Figure 2 – The route indicated is assessed as being the second most direct walking route comprising ‘comfortable’, flat (for section adjacent to the playing field), to modest gradients and safe walking environment. A pedestrian may walk on either the eastern or western side of Victor Rd, with a pedestrian safety refuge located near the large roundabout at the McIntosh Rd intersection.



Figure 3 – Character of the land that provides a link to the site from Victor Rd along the south eastern edge of the park



Figure 4 – Character of the land that provides a link to the site from Victor Rd along the south eastern edge of the park



Figure 5 – Character of the land that provides a link to the site from Victor Rd along the south eastern edge of the park



Figure 6 – looking north to south along the southern fence line of the site the photo shows manhole (concrete with terracotta pots atop) to the easment within the adjoining property at 4 The Circle.



TRANSPORT AND TRAFFIC PLANNING ASSOCIATES

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1 June 2021

Ref: 20349

Ms Natalie Matthews
MCK Architecture & Interiors

E: nataliem@mckarchitects.com

Dear Natalie

Proposed Development 2 The Circle, Narraweena

I have assessed the proposed modified access driveway which has been requested by Council.

Despite the fact that AS2890.1 does not require an ability for cars to pass on a driveway connecting to a local access road, the modified driveway provides for cars to pass. AS2890.1 Section 3.2.2 specifies that an access driveway on an arterial or sub-arterial road or where sight distance is restricted on a traffic movement of more than 30 vtp, there should be a passing bay available within the site.

The subject driveway does not involve any of these circumstances and in reality, a driver waiting to exit will wait at the kerb line and not at the site boundary. The attached swept path diagrams show the circumstances for the proposed modified driveway where a car waits to exit while a car is able to pass to enter and where an entering car waits while a car exits.

It is my assessment that the proposed modified driveway suitably provides for the Council request avoiding an unnecessary reduction in the landscape area available.

Yours faithfully

Ross Nettle
Director
Transport and Traffic Planning Associates



This drawing has been prepared using vehicle modelling computer software AutoTrack V5.00a in conjunction with AutoCAD 2013. The vehicle used is based upon vehicle data provided by Austroads and incorporates a reasonable degree of tolerance. However, it is not possible to account for all vehicle types/characteristics and/or driver ability.



SP A



This drawing has been prepared using vehicle modelling computer software AutoTrack V5.00a in conjunction with AutoCAD 2013. The vehicle used is based upon vehicle data provided by Austroads and incorporates a reasonable degree of tolerance. However, it is not possible to account for all vehicle types/characteristics and/or driver ability.



SP B



DRAWING TITLE GROUND FLOOR PLAN	DRAWING NO. DA03	ISSUE: 1
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This drawing has been prepared using vehicle modelling computer software AutoTrack V5.00a in conjunction with AutoCAD 2013. The vehicle used is based upon vehicle data provided by Austroads and incorporates a reasonable degree of tolerance. However, it is not possible to account for all vehicle types/characteristics and/or driver ability.



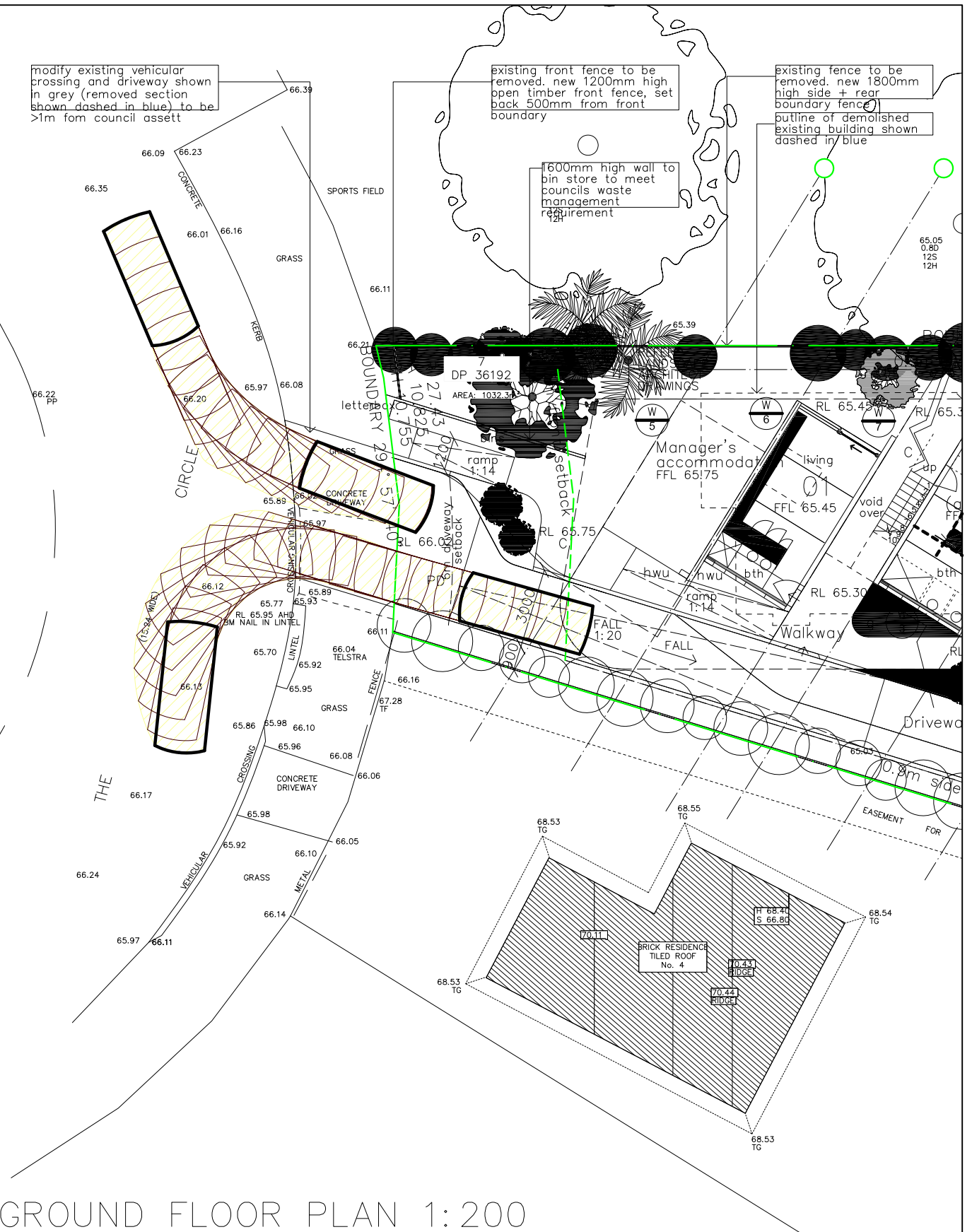
SP A

modify existing vehicular crossing and driveway shown in grey (removed section shown dashed in blue) to be >1m from council asset

existing front fence to be removed. new 1200mm high open timber front fence, set back 500mm from front boundary

existing fence to be removed. new 1800mm high side + rear boundary fence
outline of demolished existing building shown dashed in blue

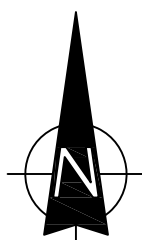
1600mm high wall to bin store to meet councils waste management requirement



GROUND FLOOR PLAN 1:200

NOTE

This drawing has been prepared using vehicle modelling computer software AutoTrack V5.00a in conjunction with AutoCAD 2013. The vehicle used is based upon vehicle data provided by Austroads and incorporates a reasonable degree of tolerance. However, it is not possible to account for all vehicle types/characteristics and/or driver ability.



**SWEPT PATH ANALYSIS
OF 85th PERCENTILE
VEHICLES PASSING**

SP B

