

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
Council Submission			
Georges River Council	Council officers reviewed the proposal and concluded that it demonstrates strategic merit and site-specific merit.	Noted and agreed. The planning proposal has demonstrated strategic and site-specific merit.	The Agile Planning team notes that the Sydney South Planning Panel (Panel) previously determined that the planning proposal demonstrated strategic and site-specific merit.
	It is imperative that the draft DCP amendment be adopted to support the planning controls in the planning proposal.	<p>The proponent did not originally submit a draft DCP with the planning proposal, however, did provide one at Council's request.</p> <p>The proponent's position is that this is not a complex or unique site which requires a site-specific approach to massing and site layout and therefore a site specific DCP. It is an ordinary site which is not dissimilar to any other site in the Georges River local government area and the future redevelopment of the site would be sufficiently guided by the Council's generic DCP, just as is the case for any other high-density development in the R4 zone.</p> <p>This is evidenced by the fact that Council recently approved a 3-storey medical centre on the subject site (DA2020/0227) without a site specific DCP.</p>	<p>The Agile Planning team understand that Council is working to finalise the DCP. The finalisation of the DCP can progress separately to the proposal and will ultimately be approved by the Council.</p> <p>The Agile Planning team is satisfied that this matter has been sufficiently addressed and does not prevent the progression of the planning proposal.</p>

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
	Council states there is a need for a VPA to accompany the planning proposal to address the local demands and cumulative impacts of the new residential population that will be enabled by the planning proposal.	Councils previously refused to progress the planning proposal without a VPA was the reason why a Rezoning Review was lodged. The Sydney South Planning Panel did not accept that a VPA was needed to progress this proposal.	<p>The Agile Planning team understands that the proponent has not offered to enter a VPA with Council regarding this proposal. Should this position change, the finalisation of a VPA can progress separately to the proposal.</p> <p>The Agile Planning team is satisfied that this matter has been sufficiently addressed and does not prevent the progression of the planning proposal.</p>
Agency Submissions			
Transport for NSW (Tens)	TfNSW has reviewed the Traffic Impact Assessment and Planning Concept & Site analysis and raised no objection subject to all vehicular access to any proposed development being via Cambridge Street rather than from Stoney Creek Road.	Noted.	<p>TfNSW has not raised any concern about the proposal, subject to all vehicular access to any proposed development being via Cambridge Street rather than from Stoney Creek Road.</p> <p>Vehicle access points would be determined once a detailed design plan has been finalised as part of any development application stage.</p> <p>The Agile Planning team is satisfied that no further action is</p>

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
			required at this stage and that the issues raised do not prevent the progression of the proposal.
Sydney Water	Potable water servicing and wastewater servicing should be available. Amplifications, adjustments, and/or minor extensions may be required.	Noted.	Sydney Water has not raised any concern about its capacity to service the future development on site. The Agile Planning team is satisfied that no further action is required at this stage in relation to water and wastewater servicing.
	Sydney Water's concurrence to the current proposal is subject to the requirement that the proponent deviate the existing stormwater channel. The proposed elevated driveway or basement access over future stormwater channel and within 1m from the outside face of the future stormwater channel is not acceptable.	The application is for a planning proposal and not a specific development type. The concept design which supports the planning proposal is only conceptual in nature, however, does not illustrate an elevated driveway or basement access over future Sydney Water's stormwater channel and within 1m from the outside face of the future stormwater channel. Any future development proposal on the site will adopt the same design approach in relation to the Sydney Water asset as that which was approved under development application DA2020/0227 and will comply	The issues raised by Sydney Water relating to the encroachment on its stormwater channel related to design elements shown within the concept plan. Any future residential development will be subject to detailed design analysis and will need to be compliant with any Sydney Water design requirements. The Agile Planning team is satisfied that no further action is required at this stage in relation to the issues raised regarding the stormwater channel.

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
		with the identified requirements by Sydney Water.	
	If this proposal development is going to generate trade wastewater, the developer must apply requesting permission to discharge trade wastewater to Sydney Water's wastewater system. Applicant must wait for approval and issue of a permit before any business activities can commence.	The application is for a planning proposal and not a specific development. A future development application will address the application requirements for trade wastewater discharge.	<p>The issues raised by Sydney Water relating to trade wastewater requirements would need to be addressed as part of any future development application for a residential development on site by the proponent.</p> <p>The Agile Planning team is satisfied that no further action is required at this stage in relation to the issues raised regarding trade wastewater requirement.</p>
NSW State Emergency Services (SES)	<p>SES noted that the site is directly in a known overland flow path within the 1% Annual Exceedance Probability (AEP) flood extent and is prone to high velocity flooding on and immediately surrounding the site (>2.0m/s during 1% AEP events).</p> <p>The proposal is inconsistent with Ministerial Section 9.1 Direction 4.1 – Flooding.</p>	The updated Flood Risk Impact Assessment (FRIA) (Northrop, 2023) demonstrates the subject site is in a Low Flood Hazard Precinct as defined by Georges River Council Stormwater Management Policy (2020). A small spike in flow velocities greater than 2.0m/s is observed during the 1% AEP; however, this occurs as flows pass around the existing building. Most of the site is exposed to low flood hazard conditions during the 1% AEP.	<p>The proponent has submitted an updated FRIA to addresses the matters raised by SES. This work concludes that there is no significant change to flood hazard both on and off site compared to existing conditions. They have also identified several flood mitigations measures to address the concerns raised by SES.</p> <p>Regarding the proposals inconsistency with Ministerial Direction 4.1 Flooding, the Agile</p>

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
		The updated FRIA discusses compliance with the NSW Ministerial Direction 4.1 – Flooding.	<p>Planning team is satisfied that the proposal has justified its inconsistency with the direction under the terms of the Direction as the planning proposal is supported by a FRIA (April 2023) prepared in accordance with the principles of the Floodplain Development Manual 2005.</p> <p>The Agile Planning team is satisfied that the issues relating to the site's location within a flood zone and consistency with Ministerial Direction 4.1 Flooding have been addressed by the proponent sufficient for the proposal to progress to finalisation.</p>
	Risk assessment should consider the full range of flooding, including events up to the PMF and not focus only on the 1% AEP flood.	The flood behaviour section of the updated FRIA includes consideration to events ranging from the 50% AEP (i.e., 2yr ARI) to the PMF. It also presents additional flood figures for the 50%, 20%, 10%, 5% AEP and the 1% AEP plus climate change.	<p>The proponent has submitted an updated FRIA that models a variety of flooding scenarios, including those present in the PMF and ARP, including climate change.</p> <p>The Agile Planning team is satisfied that the proponent has updated the FRIA modelling to address a range of flooding</p>

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
			scenarios. The issues raised do not prevent the proposal from progressing to finalisation.
	<p>Risk assessment should have regard to flood warning and evacuation demand on existing and future access/egress routes. Consideration should also be given to the impacts of localised flooding on evacuation routes.</p> <p>Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation.</p>	<p>The flood emergency response summary in the updated FRIA suggests a “early closure and evacuation of the facility” strategy, up to a day in advance if warning time permits, is appropriate to many the evacuation risks on site. Evacuation well in advance of the event occurring is not expected to significantly increase demand on existing access and egress routes. Where sufficient time for evacuation is not available on-site refuge is recommended. On site refuge is also not expected to increase evacuation demand on existing access and egress routes as occupants are expected to remain on-site. Evacuation of the site, once rainfall has commenced, is not recommended due to the potential for the regional road network to be compromised by flood water.</p>	<p>The proposal has included a flood emergency response as part of the FRIA. This response demonstrates that flood warning and evacuation demand on site can be managed through a combination of design solutions and appropriate operational/behavioural measures.</p> <p>The Agile Planning team is satisfied that this issue has been addressed by the proponent sufficient for the proposal to progress to finalisation.</p>
	<p>The cumulative impacts any development will have on risk to life and the existing and future community and emergency service resources in the future.</p>	<p>It is anticipated that a future development application for a residential flat building would undertake an investigation to confirm adverse flood impacts do not occur and the proposed development would align with the Guiding Principles for Flood Management for Future Development and the site-specific DCP.</p>	<p>The planning proposal is supported by an updated FRIA that addresses the cumulative impact any future development may have on the existing and future community. The FRIA also address evacuation strategies that may be</p>

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
		The existing approved medical centre development concluded that adverse impacts were not expected, and the existing risk was expected to remain the same or reduce because of the development.	<p>implemented to reduce demand on emergency service resources.</p> <p>The Agile Planning team is satisfied that the cumulative impacts of the development regarding to offsite flooding and evacuation demand have been addressed by the proponent sufficient for the proposal to progress to finalisation.</p>
Department of Planning and Environment, Environment and Heritage branch, Biodiversity Conservation Division (BCD)	The development site is in the upper reaches of Bardwell Creek Catchment, along a well-defined flow path, and would be flood affected under frequent to rare events. The expected floodwater depth under baseline conditions during a 1% AEP Event would be around 0.3m to 0.5m and higher, whilst it would be 1m and higher under the PMF Event.	<p>The recently approved medical centre on the site adopted Council's required Flood Planning Level of 1% AEP + 300mm freeboard, which is a level of 30.8 Australian Height Datum (AHD).</p> <p>The PMF level is only 140mm higher at 30.94m AHD.</p> <p>There is no objection to the future development of the site adopting PMF as the Flood Planning Level for the basement instead of 1% AEP + 300mm freeboard.</p>	<p>The site is identified as being Low Flood Hazard Precinct as defined by Georges River Council Stormwater Management Policy (2020). The FRIA identifies that there is potential for a small spike in flow velocities greater than 2.0m/s during the 1% AEP, however, this occurs as flows pass around the existing building. Much of the site is exposed to low flood hazard conditions during the 1% AEP.</p> <p>Noting the proponents comments to consider design changes as part of any future residential flat building</p>

Summary of Submissions

PP-2021-6630



Submission Name	Issues Raised	Proponent Response	Agile Planning Teams Response
			development, the Agile Planning team the proponent has addressed the issue sufficient for the proposal to progress to finalisation.
	Consistency with Ministerial Direction 4.1 –Flooding must be demonstrated. The proposed R4-high density zoning is considered to have the potential to expose more residents to flood risk which appears to be inconsistent with the Direction.	A detailed response in relation to Ministerial Direction 4.1 is included in the updated flood impact assessment dated 14 April 2023.	As previously discussed, the Agile Planning team is satisfied that the proposal has justified its inconsistency with the Direction under the terms of the Direction as the planning proposal is supported by a updated FRIA (April 2023) prepared in accordance with the principles of the Floodplain Development Manual 2005.

Summary of Submissions

PP-2021-6630



Community submission on planning proposal			
Submission Number	Issues Raised	Proponent Response	Agile Planning Teams Response
Submission No.1 (Sub-4161)	Objection: Scale and visual impact The change from R2 to R4 zoned development at a site of its size will create a significant visual impact on the outlook for the neighbouring properties.	<p>No height or FSR development standards currently apply to most of the site. To provide certainty around the future built form outcomes on the site and limit the impacts of a possible future redevelopment of the site on the surrounding properties, the planning proposal includes the addition of a 16-metre height of buildings control and 1.4:1 maximum FSR control.</p> <p>A height of 16 metres and floor space ratio of 1.4:1 was recently approved on the site under DA2020/0227. As part of the assessment of the approved three storey medical centre on the site, Council found that the height and FSR of the development was compatible with the surrounding land uses and within its context.</p> <p>A similar assessment of a preliminary design for a residential flat building on the site has been undertaken by Council for the subject Planning Proposal. The concept plans demonstrate that a residential flat building of a similar envelope to the medical centre, will result in no greater impacts to the</p>	<p>The portion of the site zoned SP2 Public Administration, currently has no built form controls, with the R2 Low Density Residential zoned land having the same height of building and FSR controls as the surrounding low-density areas. The site is adjacent to an existing high density residential zone area and within 200m of the Beverley Hills Town Centre, of which both areas mostly have lower built form controls that the subject site. The Beverley Hills Town Centre currently has a FSR of 2:1 for its E1 Local Centre zoned land.</p> <p>Although the controls do not match the numerical standards of the surrounding residential zoned land, concept plans demonstrate that a residential flat building of a similar built form to the approved medical centre, will result in similar impacts to development already approved for the site.</p>

Summary of Submissions

PP-2021-6630



		<p>surrounding sites when compared with the approved medical centre building on the site. Accordingly, the shadow cast by any future redevelopment on the site will be consistent with the shadow cast by the recently approved building.</p> <p>Notwithstanding, any future development application will be governed by the provisions of the Georges River Development Control Plan 2021, which contains provisions relating to the protection of solar access for neighbouring properties.</p>	<p>Should the site be developed for a residential flat building, it would be subject to detailed assessment against the provisions of scale, height, and compatibility with the surrounding characters and its visual impact at development application stage.</p> <p>The Agile Planning team is satisfied that the planning proposal provides a suitable response to the issues raised relating to building height and local character and do not prevent the proposal from progressing to finalisation.</p>
	<p>Objection: Inappropriate zone The proposed land use zone is inappropriate for the intended commercial use on site. The rezoning should not permit the construction of a high-density residential development. E2 Commercial Centre and R2 Low Density Residential would be a more appropriate zone.</p> <p>Any rezoning to R4 High Density Residential should not be done in isolation. The entire region marked as</p>	<p>The current SP2 Infrastructure (Public Administration) zone on site has become redundant. The reasons for the proposed R4 High Density Residential zone and the additional permitted uses of “office premises” and “business premises” are as follows:</p> <ul style="list-style-type: none"> the proposed R4 zone reflects the residential context of the site. the proposed R4 zone reflects the scale and density of the recently approved building on the site. the proposed R4 zone allows for the type of development which is compatible with 	<p>In making its determination, the Panel determined that the planning proposal, including the proposed zoning and additional permitted uses, demonstrated strategic and site-specific merit.</p> <p>Council also supports the proposed zoning and additional permitted uses as the zoning is considered an appropriate planning response, and the intended land uses within the proposal do not meet the</p>

Summary of Submissions

PP-2021-6630



	<p>“future housing investigation” should be rezoned to ensure consistency with the Beverly Hills Town Centre Master Plan.</p>	<p>the flood affection of the site, being residential flat buildings and shop top housing which have a large format floorplate capable of accommodating a flood chamber below ground floor; and</p> <ul style="list-style-type: none">• “Office premises” and “business premises” are proposed as additional permitted uses to broaden the range of uses that can occupy the existing building on the site and the approved three storey medical building	<p>objectives of the current SP2 Infrastructure (Public Administration) zone.</p> <p>The planning proposal has demonstrated strategic and site-specific merit to support the proposed rezoning and additional permitted uses to justify the progression of the proposal in its current form. It is considered that the proposal is consistent with the overarching State and local strategic documents and that the zoning would permit the site to achieve objectives within these strategic plans, such as the delivery of housing near jobs and homes, and work towards the goal of creating a 30-minute city with improved local access.</p> <p>The Agile Planning team is satisfied that this issue has been addressed by the proponent and do not preclude the proposal from proceeding to finalisation.</p>
Submission No. 2 (SUB-4166)	Objection: Scale and visual impact, Building height and density	No height or FSR development standards currently apply to most of the site. To provide certainty around the future built form	The portion of the site zoned SP2 Public Administration, currently has no built form controls, with the R2

Summary of Submissions

PP-2021-6630



	<p>The proposed development will be one of Beverly Hills' tallest buildings. It will be visible from surrounding areas due to the hilly terrain, particularly coming down King Georges Road from the north. There should be stricter controls given its surrounding low and medium density characters.</p> <p>I do not oppose the residential use but am very against the height limit being more than 12m. A maximum 1:1 FSR, a three-storey limit exclusive of subterranean floors, and a 12m height limit inclusive of the roof should be imposed.</p>	<p>outcomes on the site and limit the impacts of a possible future redevelopment of the site on the surrounding properties, the Planning Proposal includes the addition of a 16-metre height of buildings control and 1.4:1 maximum FSR control.</p> <p>A height of 16 metres and floor space ratio of 1.4:1 was recently approved on the site under DA2020/0227. As part of the assessment of the approved three storey medical centre on the site, Council found that the height and FSR of the development was compatible with the surrounding land uses and within its context. In accordance with the planning principle established in Project Venture Developments v Pittwater Council [2005] NSWLEC 191 for determining whether a proposal is compatible with its context, Council considered whether:</p> <ul style="list-style-type: none"> • The proposal's physical impacts on surrounding development are acceptable. The physical impacts included noise, overlooking, overshadowing, and constraining development potential. • The proposal's appearance is in harmony with the building around it and the character of the street. <p>The proposal was found to be acceptable for each of these considerations.</p>	<p>Low Density Residential zoned land having the same height of building and FSR controls as the surrounding low-density areas.</p> <p>The site is adjacent to an existing high density residential zone area and within 200m of the Beverley Hills Town Centre, of which both areas mostly have lower built form controls that the subject site. The Beverley Hills Town Centre currently has a FSR of 2:1 for its E1 Local Centre zoned land. Although the controls do not match the numerical standards of the surrounding residential zoned land, concept plans demonstrate that a residential flat building of a similar built form to the approved medical centre, will result in similar impacts to development already approved for the site.</p> <p>Should the site be developed for a residential flat building, it would be subject to detailed assessment against the provisions of scale, height, and compatibility with the surrounding characters and its</p>
--	---	---	--

Summary of Submissions

PP-2021-6630



		<p>A similar assessment of a preliminary design for a residential flat building on the site has been undertaken by Council for the subject Planning Proposal. The concept plans demonstrate that a residential flat building of a similar envelope to the medical centre, will result in no greater impacts to the surrounding sites when compared with the approved medical centre building on the site.</p>	<p>visual impact at development application stage.</p> <p>The Agile Planning team is satisfied that the planning proposal provides a suitable response to the issues raised relating to building height and local character and do not prevent the proposal from progressing to finalisation.</p>
	<p>Objection: Inappropriate use The site is far from everything, and the proposed office or any potential retail uses are not in high demand. The proposed health precinct operation would not be successful. Office, business, retail or food and drink premises use should not be approved.</p>	<p>It is noted that the submissions included two opposing views, some which supported residential use of the site, and some that support only commercial use of the site. The SP2 Infrastructure (Public Administration) zone has become redundant. The reasons for the proposed R4 High Density Residential zone and the additional permitted uses of “office premises” and “business premises” are as follows:</p> <ul style="list-style-type: none"> • the proposed R4 zone reflects the residential context of the site. • the proposed R4 zone reflects the scale and density of the recently approved building on the site. • the proposed R4 zone allows for the type of development which is compatible with the flood affection of the site, being residential flat buildings and shop top housing which have a large format 	<p>In making its determination, the Panel determined that the planning proposal, including the proposed zoning and additional permitted uses, demonstrated strategic and site-specific merit.</p> <p>Council also supports the proposed zoning and additional permitted uses as the zoning is considered an appropriate planning response and the intended land uses within the proposal do not meet the objectives of the current SP2 Infrastructure (Public Administration) zone.</p> <p>The planning proposal has demonstrated strategic and site-specific merit to support the</p>

Summary of Submissions

PP-2021-6630



		<p>floorplate capable of accommodating a flood chamber below ground floor; and</p> <ul style="list-style-type: none">• “Office premises” and “business premises” are proposed as additional permitted uses to broaden the range of uses that can occupy the existing building on the site and the approved three storey medical building	<p>proposed rezoning and additional permitted uses to justify the progression of the proposal in its current form. It is considered that the proposal is consistent with the overarching State and local strategic documents and that the zoning would permit the site to achieve objectives within these strategic plans, such as the delivery of housing near jobs and homes, and work towards the goal of creating a 30-minute city with improved local access.</p> <p>The Agile Planning team is satisfied that this issue has been addressed by the proponent and do not preclude the proposal from proceeding to finalisation.</p>
	<p>Objection: Traffic, pedestrian safety, and parking</p> <p><u>Parking</u> Parking is very limited in the area. Adequate on-site parking for all premises contained within the site should be provided.</p> <p><u>Pedestrian</u></p>	<p>The former RTA use of the site resulted in 130 peak hour trips, the approved medical centre results in 110 peak hour trips, whilst a potential residential flat development of the site will result in approximately 18 peak hour trips.</p> <p>The planning proposal will allow for alternative development of the site which will result in reduced traffic impacts when</p>	<p>The proponent has provided traffic modelling in its Traffic Impact Assessment (Ason Group, April 2022) which concludes that any potential traffic impacts will be minor, and that car parking rates consistent with DCP requirements can be achieved on site. The Traffic Impact Assessment also found that traffic generation</p>

Summary of Submissions

PP-2021-6630



	<p>The proposal will also generate much traffic on already very congested roads and exacerbate the existing pedestrian movability issues.</p>	<p>compared with the historical and recently approved uses of the site.</p> <p>The actual traffic impact associated with the redevelopment of the site will be assessed during a future development application. Car parking associated with the redevelopment of the site will be assessed during a future development application.</p>	<p>resulting from any potential residential flat building would be less than what is expected under the currently approved medical centre.</p> <p>Should the site be developed for a residential flat building, it would be subject to further detailed assessment to address traffic generation and the provision of on-site parking at development application stage.</p> <p>The Agile Planning team is satisfied that the issues relating to traffic and parking have been addressed by the proponent and do not prevent the proposal progressing to finalisation.</p>
<p>Submission No.3 (SUB-4204)</p>	<p>Objection: Overshadowing, Setbacks, height, density, and streetscape</p> <p>The four-storey structure significantly reduces light and warmth. It will impact the sunlight required for nearby solar panels and the garden space along the boundary with 143 Stoney Creek Road.</p>	<p>The Planning Proposal only seeks consent for a height of 16 metres which matches the height of the recently approved medical centre on the site. Accordingly, the shadow cast by any future redevelopment on the site will be consistent with the shadow cast by the recently approved building.</p> <p>Notwithstanding, any future development application will be governed by the provisions</p>	<p>The portion of the site zoned SP2 Public Administration, currently has no built form controls, with the R2 Low Density Residential zoned land having the same height of building and FSR controls as the surrounding low-density areas.</p> <p>The site is adjacent to an existing high density residential zone area</p>

Summary of Submissions

PP-2021-6630



	<p>I request further consideration of the setback limits, height of the building and number of units in the proposal to maintain the existing streetscape.</p>	<p>of the Georges River Development Control Plan 2021, which contains provisions relating to the protection of solar access for neighbouring properties.</p> <p>No height or FSR development standards currently apply to most of the site. To provide certainty around the future built form outcomes on the site and limit the impacts of a possible future redevelopment of the site on the surrounding properties, the Planning Proposal includes the addition of a 16-metre height of buildings control and 1.4:1 maximum FSR control.</p> <p>A height of 16 metres and floor space ratio of 1.4:1 was recently approved on the site under DA2020/0227. As part of the assessment of the approved three storey medical centre on the site, Council found that the height and FSR of the development was compatible with the surrounding land uses and within its context.</p> <p>A similar assessment of a preliminary design for a residential flat building on the site has been undertaken by Council for the subject Planning Proposal. The concept plans demonstrate that a residential flat building of a similar envelope to the medical centre, will</p>	<p>and within 200m of the Beverley Hills Town Centre, of which both areas mostly have lower built form controls that the subject site. The Beverley Hills Town Centre currently has a FSR of 2:1 for its E1 Local Centre zoned land. Although the controls do not match the numerical standards of the surrounding residential zoned land, concept plans demonstrate that a residential flat building of a similar built form to the approved medical centre, will result in similar impacts to development already approved for the site.</p> <p>Should the site be developed for a residential flat building, it would be subject to detailed assessment against the provisions of scale, height, and compatibility with the surrounding characters and its visual impact at development application stage.</p> <p>The Agile Planning team is satisfied that the planning proposal provides a suitable response to the issues raised relating to building</p>
--	--	---	---

Summary of Submissions

PP-2021-6630



		result in no greater impacts to the surrounding sites when compared with the approved medical centre building on the site	height and local character and do not prevent the proposal from progressing to finalisation.
	Objection: Noise and parking I request further consideration of the noise limits and parking availability for visitors in nearby streets.	<p>The former RTA use of the site resulted in 130 peak hour trips, the approved medical centre results in 110 peak hour trips, whilst a potential residential flat development of the site will result in approximately 18 peak hour trips.</p> <p>The planning proposal will allow for alternative development of the site which will result in reduced traffic impacts when compared with the historical and recently approved uses of the site.</p> <p>The actual traffic impact associated with the redevelopment of the site will be assessed during a future development application.</p> <p>Car parking associated with the redevelopment of the site will be assessed during a future development application.</p>	<p>The proponent has provided traffic modelling in its Traffic Impact Assessment (Ason Group, April 2022) which concludes that any potential traffic impacts will be minor, and that car parking rates consistent with DCP requirements can be achieved on site. The Traffic Impact Assessment also found that traffic generation resulting from any potential residential flat building would be less than what is expected under the currently approved medical centre.</p> <p>Should the site be developed for a residential flat building, it would be subject to further detailed assessment to address traffic generation and the provision of on-site parking at development application stage.</p> <p>The Agile Planning team is satisfied that the issues relating to traffic and parking have been</p>

Summary of Submissions

PP-2021-6630



			addressed by the proponent and do not prevent the proposal progressing to finalisation.
Submission No.4 (SUB-4206)	The submission contains a pro forma letter, containing the same matters raised as those in Sub-4166 (Submission No. 2). No new issues were raised.	See the response to Submission No.2 above.	See the response to Submission No.2 above.
Submission No.5 (SUB-4208)	The submission contains a pro forma letter, containing the same matters raised as those in Sub-4166 (Submission No. 2). No new issues were raised.	See the response to Submission No.2 above.	See the response to Submission No.2 above.

Community submission on Development Control Plan			
Submission Number	Issues Raised	Proponent Response	Agile Planning Teams Response
Submission No.6 (Via email)	Objection: Flooding impact If there is an intention for underground parking, has the presence of the flood zone and impacts of flooding been adequately assessed and mitigated, including the need for pumping of basements and associated noise?	An updated FRIA (April 2023) has been submitted during the exhibition period and a response to the concerns raised by both SES and EHG has been submitted (Attachment J). The updated FRIA (April 2023) indicates the site is in a low flood hazard area, as determined by the Georges River Council Stormwater Management Policy (2020). The FRIA also noted that a small spike in flow velocities occurs during certain flood conditions, however this occurs as the flows pass around the existing building and that	The proponent has submitted an updated FRIA to addresses the matters raised by EHG and SES as well as the Gateway determination. This work concludes that there is no significant change to flood hazard both on and off site compared to existing conditions. They have also identified several flood mitigations measures to address the concerns raised by SES.

Summary of Submissions

PP-2021-6630



	<p>most of the site remains exposed to low flood hazard conditions during the 1% AEP.</p> <p>The NSW Floodplain Development manual does not support the use of zoning to unjustifiably restrict development simply because land is flood prone and should be based on objective assessments.</p> <p>The NSW DPE Draft Shelter-in-Place guideline suggests shelter in place may be suitable for flash flood events, where a short warning and inundation time is expected. This is consistent with the type of event that is expected to occur at the subject site.</p> <p>Furthermore, the flood risk associated with the proposed residential development can be managed through engineered solutions and operational measures. Habitable spaces can be placed at an appropriate height above the flood level and outline additional development controls in a DCP.</p> <p>Regarding exposing more residents to flood risk, the site is not considered to be an area of high hazard and the proposed changes sought under this proposal do not represent a significant increase in the development of the</p>	<p>The issues raised by SES and EHG relating largely for consideration at any subsequent development application stage on the site. Notwithstanding this, the updated FRIA and modelling submitted by the proponent have addressed the development specific issues raised by SES and EHG.</p> <p>Regarding the proposals inconsistency with Ministerial Direction 4.1 Flooding, the Agile Planning team is satisfied that the proposal has justified its inconsistency with the direction under the terms of the Direction as the planning proposal is supported by a FRIA (April 2023) prepared in accordance with the principles of the Floodplain Development Manual 2005.</p> <p>The Agile Planning team is satisfied that the issues relating to flooding have been addressed by the proponent sufficient for the proposal to progress to finalisation.</p>
--	--	--

Summary of Submissions

PP-2021-6630



		<p>land, given these controls reflect the recently approved medical centre on the land.</p> <p>The updated FRIA (April 2023) has been updated to considers various flood events ranging from the 50% AEP to the PMF (included 1% AEP plus climate change). Evacuation strategies have been investigated and the opportunity for greater education and awareness about flooding is also presented with an opportunity to introduce a regional evacuation centre.</p>	
--	--	---	--