

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
Agency Submission			
<b>Environment and Heritage Group (EHG)</b>	<p>EHG have provided 5 separate submissions on the proposal since the public exhibition of the documents in late 2022. The overarching theme from EHG submissions were the lack of identification and protection for threatened and endangered species, populations, ecological communities, and habitats included in the proposal.</p> <p><i>EHG Submission September 2022</i> - EHG indicated that the Ecological Assessment (ACS Environmental, June 2021) submitted was inadequate and failed to consider all impacts associated with the proposal including identifying biodiversity values or threatened species. The proposal was required to be supported by a Biodiversity Development Assessment Report (BDAR) as trees identified for removal are currently mapped with council's Biodiversity Values Map and there is potential for the Biodiversity Offset Scheme (BOS) area threshold to be exceeded. EHG requested that the proponent include assessment to determine whether any threatened and endangered</p>	<p>The proponent has advised that they support the proposed C2 Environmental Conservation zoning of the areas identified by EHG in their submission dated 9 November 2023.</p> <p>Notwithstanding this, an updated package of documents has been provided in responses to all EHG's submissions, with the final version being dated 17 November 2023. This package included an updated Urban Design Report and Bushfire Advice (<b>Attachment S</b>).</p> <p>The landscape master plan has been amended from its original form to reduce the number of trees to be removed from 233 to 188, with 50 of these being identified as significant trees in the Arborist assessment. Any ecological impacts associated with the proposal would be minimal and could be offset through purchase of ecosystem credits. The following further changes have been made to the Master Plan:</p>	<p>The Agile Planning team notes that the proponent has revised the biodiversity material on several occasions to address the issues raised by EHG. It is also noted that EHG still have unresolved issues with the BDAR submitted by the proponent, however these can be addressed and resolved through the development approval process.</p> <p>It is noted that while the proposal will result in the loss of some existing vegetation on site, the proponent has presented a satisfactory solution to retain high diversity value areas and offset the loss of other vegetation within the site, including adopting the C2 Environmental Conservation zone to protect the areas highlighted as important habitat by EHG.</p> <p>The Agile Planning team supports EHG recommendation that the</p>

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
	<p>species, populations, ecological communities, and habitats occur on the site, as these items have previously been mapped on the site.</p> <p><i>EHG Submission February 2023</i> – EHG reviewed the proponent's revised planning proposal package, including a BDAR, and identified that there was still insufficient information to determine the full extent of threatened and endangered species, populations, ecological communities, and habitats potentially impacted by the development and therefore EHG were unable undertake a comprehensive assessment of the proposal.</p> <p><i>EHG Submission May 2023</i> – EHG provided more detail comments specifically on the BDAR. EHG noted that the BDAR still was inadequate and therefore the outcomes of the report could not be relied upon. EHG identified that the BDAR contained inconsistencies in identification of threatened and endangered species, populations, ecological communities and habitats and the way it had identified and applied Plant Community Types. The BDAR also failed to</p>	<ul style="list-style-type: none"><li>• location of building footprints of the clubhouse and ILUs, realignment of the eastern access road and reduction in the yield of townhouses</li><li>• Redesign and reduction of southern townhouses to retain more mature native vegetation along the southern boundary and thereby minimising impacts to Swift Parrot feed trees (adjacent mapped important habitat area for the species) and reduced clearing of PCT 3952</li><li>• Modification of the north-eastern Independent Living Apartment Building to avoid and minimise impact on the adjacent vegetation to the north.</li></ul>	<p>proposal be updated to rezone part of the site C2 Environmental Conservation zone to ensure the appropriate ongoing management and protection of these habitats.</p> <p>The Agile Planning team is satisfied that the issues raised by EHG relating to biodiversity have been addressed by the proponent and do not prevent the proposal progressing to finalisation.</p>

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
	<p>demonstrate how the proposal tried to avoid impacts to significant biodiversity values on site.</p> <p><i>EHG Submission August 2023</i> – EHG provided a submission stating that in its current form, considering the amended planning proposal package provided, that they did not support the planning proposal. EHG noted that the revised BDAR had addressed some of the previously raised issues, however still had not addressed the extent of clearing and vegetation management required for the sites proposed asset protection zone (APZ). EHG also noted that the BDAR still contained several insufficiencies surrounding the mapping and identification of threatened and endangered species, populations, ecological communities and habitats located on site.</p> <p><i>EHG Submission November 2023</i> - EHG has reviewed the proponent revised response letter and attachments dated 6 October 2023, and recommended that EHG could support the proposal progressing, pending:</p> <ul style="list-style-type: none"><li>the proposal being updated to include C2 Environmental Conservation zoning for the</li></ul>		

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
	<p>Sydney Turpentine Ironbark Forest communities and Swift Parrot habitat on the site.</p> <ul style="list-style-type: none"><li>the C2 Environmental Conservation land is managed for conservation and is not to be used as an APZ, open space, or grassed/garden/landscaped area</li><li>a vegetation management plan is prepared and implemented for the site as part of any future development approval stage.</li></ul> <p>EHG advised that whilst the updated BDAR addressed many concerns that were raised previously, it should not be relied on as part of development approval stage as it still contained several deficiencies.</p>		
<b>Rural Fire Service (RFS)</b>	<p>RFS have made several submissions on the proposal. In summary, RFS have raised no objection to the progression of the planning proposal for seniors housing and the nominated residential uses.</p> <p><i>RFS submission November 2022</i> – RFS raised no concern with the maintaining the current zoning and allowing the proposed uses as</p>	<p>The upper limits of the proposed R3 Medium Density Residential Zoning under the exhibited concept plan is approximately 10% above the mapped dwelling/bed count. Based on this figure, the analysis of the roadways for emergency egress and fire brigade access demonstrates the networks can adequately function and that the</p>	<p>The Agile Planning team notes that the current housing stock on the site is old and provides limited bushfire protection. There are existing ILUs on the site which are located within the flame zone and none of the existing buildings, including the RACF, are constructed to a standard that</p>

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
	<p>additional permitted uses. RFS noted further analysis is needed to determine the maximum number of occupants that could be on-site, the adequacy/ appropriateness of roadways for emergency egress and fire brigade access are acceptable given reasonable worst case bush fire scenarios. They also recommended that as part of the development approval stage, firefighting water supplies will need to be detailed. Failure to address water supply would be expected to preclude subsequent consents and approvals.</p> <p><i>RFS submission February 2023</i> - RFS stated they had no objection to the progression of the planning proposal for seniors housing and the nominated residential uses. They also noted that the additional work undertaken by the proponent addressed the issues raised in their previous submission. Notwithstanding this, RFS reiterated that firefighting water supplies would need to be addressed as part of the development approval stage.</p> <p><i>RFS Submission 27 November 2023</i> – RFS considered the proposed C2 Environmental Conservation Zone and have advised that while</p>	<p>proposed rezoning presents no significant issue.</p> <p>The site is serviced by reticulated water and also two 74,000 litre water tanks dedicated for firefighting with a combined hydrant and sprinkler booster. Water supplies are considered an engineering issue and can be addressed as part of the more detailed design development and future development approvals stage.</p>	<p>meets contemporary bushfire protection measures under Australian Standards. The redevelopment of the site provides an opportunity for more modern buildings, meeting the current standards and bushfire protection measures, to be built to protect the community.</p> <p>The proponent has prepared and submitted 3 bushfire reports (Attachment T) all by Blackash Bushfire Consulting in February 2022, December 2022 (Addendum) and November 2023 and an addendum letter (October 2023), all of which concluded that the rezoning presents no issues in relation to bushfire that can't be addressed through their Bushfire Engineering Design Compliance Strategy (November 2020) or through design during development approval stage.</p>

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
	<p>the intent of the proposed Bushfire Engineering Design and Compliance Strategy could still be met. In response to the changes required by EHG, RFS have also indicated that the site may require an internal 'perimeter road' to be incorporated on the site in accordance with PBP 2019.</p>		<p>TfNSW have raised no concern about the traffic generated from the development nor the road networks capacity to handle traffic in an evacuation situation. RFS have not objected to the progression of the proposal or the proposed residential and seniors uses on site.</p> <p>Regarding the inclusion of C2 Environmental Conservation on site, the Agile Planning team is satisfied that it does not adversely impact the performance of the site in a bushfire scenario.</p> <p>The Agile Planning Team considers that issues raised regarding bushfire have been adequately addressed at this stage of the planning proposal and the issues raised do not prevent the proposal proceeding to finalisation. Further bushfire assessment will be undertaken through the development approval process to</p>

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
			ensure the site meets the requirements of the NSW RFS for bushfire safety.
<b>Transport for NSW (TfNSW)</b>	<p>The proposal will provide opportunities for improvements to active and public transport amenities.</p> <p>Traffic generated by the proposal is relatively minor in nature noting that vehicle trips generated by seniors housing (not employees of the village) generally occur outside of the peak periods.</p>	Noted.	Noted. Agile Planning team considers that the issues raised by TfNSW not prevent the progression of the proposal to finalisation stage.
<b>Heritage NSW</b>	<p>There are no impacts on Aboriginal objects or places or State heritage items or historic archaeology. Further work may be required to determine the potential impact the planning proposal may have on surrounding items of heritage value.</p>	<p>An Aboriginal Heritage Due Diligence Assessment (AMBS Ecology and Heritage – December 2022) supporting the proposal recommends that no further Aboriginal cultural heritage assessment is required and further work can be done at any future development to identify and protect any heritage items.</p> <p>The planning proposal is accompanied by a Heritage Impact Statement (Urbis – June 2021) which concludes that the proposal will not impact on the adjacent heritage conservation areas and will mitigate any</p>	<p>The Agile Planning team notes that Heritage NSW raised no concern regarding the proposal or its potential impacts on nearby heritage items.</p> <p>It is noted that since the lodgement of this proposal, Headfort House Chapel (item I184) was listed as a local heritage item. Any future development application on the site will need to address any potential impacts development may have on this item.</p>

# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
		potential impacts through design and landscaping strategies.	The Agile Planning team is satisfied that no further action is required at this stage in relation to this matter raised by Heritage NSW and that the issues raised don't prevent the progression of the proposal.
<b>Schools Infrastructure NSW (SINSW)</b>	The proposal does not meet the criteria for further consideration, and will not generate significant additional students or need for teaching spaces.	Noted.	Noted. Agile Planning team considers that the issues raised by SINSW do not prevent the progression of the proposal to finalisation stage.
<b>Sydney Water</b>	Potable water and wastewater system should have adequate capacity to service the proposed development, however amplifications, adjustments, and/or minor extensions may be required once a final design has been determined.	Noted. Further investigation of utility servicing and any necessary upgrades will be identified at DA stage	Noted. Agile Planning team considers that the issues raised Sydney Water do not prevent the progression of the proposal to finalisation stage.
<b>Ausgrid</b>	No comment on the planning proposal, but will provide feedback on any future development application.	Noted.	Noted. Agile Planning team considers that the issues raised by Ausgrid do not prevent the progression of the proposal to finalisation stage.



# Summary of Agency Submissions

PP-2022-658



Submission Name	Issues Raised	Proponent Response	Agile Planning Team Response
NSW Department of Health (NSW Health)	No comment on the planning proposal.	No comment.	Noted. Agile Planning team notes that NSW Health no issues preventing the progression of the proposal to finalisation stage.