

Summary of Submissions – Council

PP-2022-658



Council Submission			
Issue	Issues Raised	Proponent Response	Agile Planning Team Response
Strategic Merit Assessment	<p>The proposal has not demonstrated an alignment with the Greater Sydney Region Plan - A Metropolis of Three Cities, the North District Plan, the Ku-ring-gai Local Strategic Planning Statement and the Ku-ring-gai Housing Strategy.</p> <p>The proposal also fails to demonstrate site specific merit on the fundamental issues of bushfire risk, ecology and heritage consideration.</p> <p>Given the lack of detail and multiple flaws throughout the package, the proposal clearly does not achieve strategic merit nor site specific merit.</p>	<p>The strategic merit of the proposed changes has been outlined in detail within the planning proposal. The Sydney North Planning Panel (Panel) has determined that the proposal has strategic and site-specific merit on 7 November 2018.</p>	<p>The Agile Planning team notes that the Panel previously determined that the planning proposal demonstrated strategic and site-specific merit when determining the rezoning review request.</p> <p>Further to the panel's decision, the Gateway Determination report issued by the Department on 10 May 2022, identifies that the proposal is consistent with the actions and objectives of the Greater Sydney Region Plan and is generally consistent with the objectives of both the Council's LSPS and LHS. The gateway required the proposal be updated to provide further clarification and updates in relation to a number of these documents, which was endorsed by the Department prior to public exhibition.</p> <p>There are no state agency submissions preventing the progression of the planning proposal to finalisation.</p>
Bushfire Assessment	<p>Ku-ring-gai Council has conducted three studies to assess the bushfire implications of increased standards under the planning proposal:</p>	<p>The NSW RFS approved a Bushfire Engineering Design Compliance Strategy (November 2020) for the site. It is noted in the submission attached by Council from RFS, they raised no objection to the rezoning proceeding. This included RFS not raising concern about the proposed</p>	<p>It is noted that Council meeting with RFS occurred on 12 September 2022, and RFS have made several submissions on the proposal since then, with the most recent submission being February 2023. In this submission, RFS state they have no objection</p>

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	<ul style="list-style-type: none"> Bushfire Peer Review: Planning Proposal (CR Bushfire 24 October 2022) Lourdes Retirement Village, Bush Fire Strategic Study (Ku-ring-gai Council 24 October 2022) Bushfire Evacuation Risk Assessment (Ku-ring-gai Council October 2022) <p>All three studies did not support the proposal, given the lack of detail surrounding the protection of any future population located on site.</p> <p>Council has separately met with RFS, with RFS confirming that they have neither endorsed nor expressed support for the planning proposal.</p> <p>In summary the studies found the following:</p> <p><u>Bushfire Peer Review</u></p> <ul style="list-style-type: none"> This Bushfire Peer Review identifies inadequacies within the exhibited proposal, limiting the ability to review the appropriateness of the proposed increase in density in relation to bushfire risk, evacuation potential and life safety. 	<p>performance-based approach, which is a supported management option under the PBP 2019 and the National Construction Code. The performance-based approach satisfies RFS bushfire safety requirements and complies with PBP 2019. The redevelopment of the site will create a safety outcome for the site that currently does not exist. Under the proposed performance-based approach, the strategy seeks to prioritise life safety to a greater extent than what can be achieved through a deemed-to-satisfy approach under PBP 2019.</p> <p>There is no need to undertake development under the current development controls as the proposal has justified, from a bushfire perspective, that there is a low bushfire risk and significant bushfire protection measures can be incorporated.</p> <p>RFS have been consulted as the planning proposal has progressed through the plan making process. As noted above, RFS approved the Bushfire Engineering Design Compliance Strategy (November 2020) and raised no objection to the rezoning proceeding on that basis. The performance-based approach, accepted by the RFS, satisfies all bushfire safety requirements, and will create a bushfire safety outcome better than what currently exists and then the deemed-to-satisfy approach under PBP</p>	<p>to the planning proposal for seniors housing and the nominated residential uses. It is also noted that the proponent has prepared a Bushfire Engineering Design and Compliance Strategy (Blackash Bushfire Consultancy November 2020) which RFS has not objected to.</p> <p>The Agile Planning team note that the proposed Seniors Housing development will be located in the topmost area of the site, furthest from a potential fire threat and constructed to current bushfire safety standards. This location was chosen in consultation with RFS. While non-seniors housing is being introduced as a 'heat shield' adjacent to the bushland interface, these buildings create this through their design and construction measures which reduce radiant heat and prevent the spread of fire.</p> <p>The Agile Planning team notes that the proponent has prepared and submitted 3 bushfire reports (all by Blackash Bushfire Consulting) in February 2022, December 2022 (Addendum) and November 2023 and 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)</p>

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	<ul style="list-style-type: none"> No full bushfire risk assessment is provided, with risk being underplayed. The proposal relies on a technical solution which does not address firefighter and occupant safety, with the detail uncertain and unimplementable within future planning stages. The Proposal is inconsistent with Section 9.1 Ministerial Direction 4.3 – Planning for bushfire Protection. Inconsistency with previous case law relating to the use of refuges or 'bunkers'. <p><u>Lourdes Retirement Village, Bush Fire Strategic Study</u></p> <ul style="list-style-type: none"> The proposal is inconsistent with the strategic planning principles, "Acceptable Solution" bushfire protection measures within the PBP 2019. The proposal doesn't not provide opportunity for protection above the minimum requirements of the PBP 2019, with compliance partially reliant on the intervention/response 	<p>2019. RFS has also deemed that the proposed performance-based approach is appropriate to satisfy the Ministerial Direction. Given the considerable and ongoing collaboration with the RFS, it was determined that a Strategic Bushfire Study was not required. As part of any future development approval stage, the development will need to comply with the Bushfire Engineering Design Compliance Strategy and requires Bush Fire Safety Authority. The finer details of the design will be developed with the NSW RFS as part of the Performance Based Design Brief process for the a development application.</p> <p>Council has prepared Bushfire Evacuation Risk Maps identifying areas where severe evacuation risks may occur during a bushfire event. The map limits certain developments in these areas, however this does not apply to any part of the site or adjacent areas. Council has also amended its LEP to zone areas considered an evacuation risk to E4 Environmental Living (now C4 Environmental Living) to limit future growth.</p> <p>An addendum bushfire report (Blackash Bushfire Consulting December 2022) has been prepared to respond to issues raised in submissions regarding bushfire risk and bushfire evacuation. Sensitivity testing was undertaken to determine the upper limit of occupants that could be accommodated on the site under the proposal,</p>	<p>or through design during development approval stage.</p> <p>TfNSW was consulted with during the public consultation period for the proposal. TfNSW raised no concern about the traffic generated from the development nor the road networks capacity to handle traffic in an evacuation situation. This position is supported by the proponents Traffic assessment which concludes any traffic generated on site would be minor, given the nature of the proposed uses.</p> <p>Ministerial Direction 4.3 relates to planning for bushfire protection and its objectives are to protect life, property and the environment from bush fire hazards and encourage sound management of bush fire prone areas. A planning proposal may be inconsistent with the terms of this Direction only if the Commissioner of the NSW Rural Fire does not object to the progression of the planning proposal.</p> <p>On 18 January 2022, RFS expressly stated that they accepted the proposed performance-based approach for the proposal and that this could satisfied the requirements of the Ministerial Direction. Further, RFS advised that notwithstanding this approach, they did not object to the progression of the proposal. The</p>
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	<p>by emergency services or hazard management on adjoining land.</p> <ul style="list-style-type: none">• This site is not suitable for increased dwellings and populations under PBP 2019.• 'Unassisted' off-site evacuation has not been demonstrated.• If the proposal is approved, it sets an undesirable precedent in the location of dwellings in a risk-prone bushland/urban environment. <p><u>Bushfire Evacuation Risk Assessment</u></p> <ul style="list-style-type: none">• Council has applied planning mechanisms under the LEP to reduce risks to population and property that would result from a bushfire event, including bushfire evacuation risk. Based on these mechanisms, the proposal is not suitable for increased population numbers.• The intensification of special fire protection purpose within an area that already exceeds the recommended number of dwellings is of concern. The increase in residents will make evacuation more	<p>with a 10% variation. This testing found that the road network is expected to be able to accommodate the uplift in traffic, both access and egress, in an emergency scenario.</p> <p>The addendum bushfire report (Blackash Bushfire Consulting December 2022) also outlines an evacuation strategy, which considers residents to shelter in place. Residents located in the Residential Aged Care Facility would not need to evacuate as it is not located on bushfire prone land and it is greater than 100 metres from bushfire prone land (beyond the requirements of Planning for Bushfire Protection 2019). The residents of the townhouses and Independent Living Units can be accommodated in the proposed refuge building (Clubhouse) which will be available and designed with an air handling system capable of being adjusted for full recycling of internal air for a period of 4 hours to avoid the introduction of smoke into the building and maintaining an internal air temperature of not more than 25°C during a bushfire event. Accordingly, no evacuation by road would be necessary, unless decided by residents. To support the Addendum Bushfire Report, Traffic Advice relating to evacuation capacity (ARUP December 2022) that both the internal and external road networks can accommodate the increase in traffic in an emergency scenario.</p>	<p>Council bushfire studies have been forwarded to RFS for their review and their position has not changed in any subsequent submissions made by RFS. A final decision on the proposals consistency with this Direction will be made as part of the finalisation process through the Departments role as the LPMA and delegate of the Minister.</p> <p>In regard to the inclusion of C2 Environmental Conservation on site, the Agile Planning team is satisfied that it does not impact the performance of the site in a bushfire scenario and has sought confirmation of this from NSW RFS to which they have indicated a perimeter road may be required through the development approval process.</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.</p>
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	<p>difficult and place residents outside the site on Stanhope Road at risk.</p> <ul style="list-style-type: none">• The majority of additional dwellings will be occupied by residents who are highly vulnerable to the effects of bushfire, are difficult to evacuate and are more susceptible to smoke impacts, anxiety and other health issues. This would increase demand for emergency services.• The Bushfire Report (Blackash February 2022) does not consider evacuation risk, instead proposing onsite refuge. It fails to explain how the refuge would cater for the 668 people, two thirds of whom are vulnerable elderly, 110 being high care including dementia patients. There is no description nor testing provided to demonstrate the viability of an onsite refuge for this profile and volume of population.		
Urban Design Assessment	The planning proposal documentation lacks detail and fails to provide enough information to directly understand the bulk, scale and interface impacts of the master plan underpinning the proposed increased standards. The lack of detail does not support the planning proposals	The proposal includes a detailed urban design analysis which has taken into full consideration the heritage and built form character of the site and surrounds. The proponent has provided an updated Urban Design Advice (December 2022) (since amended) in response to submissions	The Agile Planning team notes that the proponent has revised their urban design report several times since the public exhibition of the proposal, with the most recent version being dated 20 November 2023. These changes were to address issues raised by State Government, Community and Council

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	<p>conclusions that the increase in density will have negligible impacts on the amenity and safety of residents.</p> <p>The proposal seeks to provide housing for the elderly in 4 to 7 storey residential flat buildings and increase dwellings on the site by 74 units. The proposal has not provided an adequate response in consideration of how the intensification will impact the site in a bushfire event, however, relies upon a bushfire event to intensify development on site. The designs contain no detail to demonstrate how the site design will address the bushfire risk.</p> <p>The proposal location of 3-storey townhouses at the bushland interface is not consistent with dwelling types usually located at similar interfaces. It is unclear how the location of these dwellings will protect seniors housing from flame attack as it does not prevent the higher risk of ember attack. Further, it is unclear how increasing people at the highest bushfire risk location is justified. A more appropriate built form on the bushland fringe would be single detached dwellings which would reduce the visual</p>	<p>from council and the community. This advice included an amended concept plan to demonstrate compliance with the Apartment Design Guide for the Seniors Housing development and further detail on building RLs, building measurement and ADG compliance, solar access, cross ventilation, length and depth, deep soil, communal open space, and building separation.</p> <p>The proposal seeks to amend the LEP controls to facilitate a mix of residential buildings, ranging from mid-rise seniors housing (3-6 storeys) to low rise townhouses 2-3 storeys. The proposed building heights been located on the site to provide a transition to the surrounding areas. With the retention of onsite vegetation, seeks to minimise the impact the new built form has on these areas. The Urban Design Advice (December 2022) amends the concept plan to further break up the built form to provide for smaller building footprints and opportunities for landscaping between buildings. The advice also demonstrates how the buildings respond to the topography of the site and uses upper-level setbacks to minimize building bulk and scale.</p> <p>A reduction in storeys is inconsistent with the Gateway decision and the recommendation of the Sydney North Planning Panel (Panel) which determined the proposal has strategic and site-</p>	<p>issues received during exhibition of the proposal.</p> <p>The anticipated housing mix in the updated concept plan proposes 141 ILUs, 110 RACF beds and 59 non-seniors townhouses. This represents approximately 25% of the development on the site being for non-seniors housing uses. The Agile Planning team notes that the final housing mix will be established as part of the development approval stage.</p> <p>The Agile Planning team notes that since the proposal was on exhibition, the proponent has made the following changes to the proposal:</p> <ul style="list-style-type: none"> • Change the zoning of the site from all R3 Medium Density Residential to part R3 Medium Density Residential and part C2 Environmental Conservation. • Increased the FSR from 0.75:1 to 0.85:1. <p>The Agile Planning team supports the proposed inclusion of the C2 Environmental Conservation zone as it is consistent with EHG's request for the change.</p> <p>Prior to the inclusion of the proposed C2 Environmental Conservation zone, the proponent had reduced the proposed FSR from 0.75:1 to 0.73:1, which reduced the GFA from 39,650sqm to 38,600sqm and reduced</p>
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<p>impact on the bushland and reduce the people in a high bushfire risk location.</p> <p>To date, no information has been provided on how the proposal will enact a mechanism to separate the seniors and non-seniors housing on the site, to ensure development occurs in line with the concept plan. Since seniors and non-seniors housing are two separate forms assessed under different instruments, a subdivision of the site should occur prior to any future development to delineate and ensure the separation of areas.</p> <p>Council considered that the planning proposal has failed to demonstrate compliance with the State Environmental Planning Policy (SEPP) (Housing) 2021 with regards to the seniors housing component and council's development control plan (DCP) with regards to the non-seniors housing townhouses component. The site design should, utilise the guidance of the DPE Seniors Living Policy – urban design guidelines for infill development (DPE Seniors Living Policy), and respond to the Housing SEPP and the KDCP as a</p>	<p>specific merit. The reduction of height would result in the reduction of dwellings which is inconsistent with the NSW Government Policy of encouraging additional supply of low-rise medium density housing.</p> <p>The concept plan has been reviewed against the relevant section of the Ku-ring-gai DCP and is largely consistent with the controls for multi-dwelling housing, in relation to the town houses, and the controls for residential flat buildings, in relation to seniors housing. This will be further assessed as part of the development approval stage.</p> <p>Extensive detail has been provided on how the design addressed bushfire risk, with further advice provided as part of this response to submissions to address questions raised by RFS. The medium density buildings aren't being solely used as a heat shield; however it is noted that they provide a heat shield by their very nature.</p> <p>A Heritage Impact Assessment (Urbis) Attachment G9 confirms that the proposal would have an acceptable heritage impact on the adjacent items.</p> <p>that the proposed built form will be entirely hidden from view, while views of the built form</p>	<p>the townhouse yield from 63 to 59. Whilst the numerical value of the now proposed maximum FSR for the site has increased as a ratio, the permissible GFA on the site will actually result in a revised reduction of 38,600sqm in the new master plan.</p> <p>The Agile Planning team has undertaken its own design testing of the concept plan (as of November 2023) and notes that proposed FSR of 0.85:1 (excluding the C2 Environmental Conservation zone) is achievable and that the revised FSR will result in a reduced GFA compared to that exhibited.</p> <p>As part of this testing, the built form was reduced along the Stanhope Road interface to 2 storeys transitioning up to 3 and 4 storeys. This proposed building massing was shown to fit comfortably within the indicative footprint and envelopes and responded to concerns relating to character and compatibility with the surrounding development. The Agile Planning team therefore recommends that the proposal is updated to include the revised FSR of 0.85:1 and a reduced building height along Stanhope Road (as shown in Attachment U) prior to finalisation.</p> <p>The Department notes that the planning proposal is unlikely to act as a precedent for</p>
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	<p>baseline for determining a development footprint on site.</p> <p>The heights of the proposal will have impacts on the scenic and cultural landscape characteristics of the area and impact on the adjacent low density residential and heritage conservation areas surrounding the site.</p>	<p>from Seven Little Australians Park would almost be entirely hidden.</p> <p>While no mechanism is proposed to expressly separate where the seniors and non-seniors housing will be located, a subdivision of the Seniors and Townhouse development would form part of any future development approval stage.</p> <p>An updated View Analysis (Deneb Design) Attachment G3 illustrates views from the surrounding bushland, including from Seven Little Australians Park and Swain Gardens. The views from Swain Gardens show the concept plan has been developed to respond to the surrounding built form character including built form transitions to surrounding low density residential areas. The analysis also considers the impact from the adjacent residential areas and concludes that the built form would largely be screened by vegetation, with potential for additional planting to provide further screening. The concept plan aims to minimise visual impacts and limit any significant additional overshadowing.</p> <p>The proposal presents as 3 storeys to Stanhope Road with the fourth storey set back from the street wall, with taller development (5-6 storey) further setback from Stanhope Road and located</p>	<p>'overdevelopment' as the site presents a unique opportunity to provide for increased Seniors Housing on the site with improved design quality and bushfire safety. The size and location of the site make it unique compared with the surrounding area and as such further increases in development beyond the site would not be expected.</p> <p>The proponent has provided an indicative concept plan for how the site might be redeveloped, showing location of the footprint of structures and overall distribution of density. Given this is a planning proposal, the final design and layout of the plan is not approved as part of the LEP finalisation. The final layout of the site, including buildings and road network will be determined as part of the development approval stage.</p> <p>It is noted that the proponent has not suggested a LEP mechanism to ensure the distribution of seniors and non-seniors housing reflects the layout of the concept plan. The planning proposal seeks to achieve this mix of development by rezoning the entire site R3 Medium Density Residential, with the exclusion of areas to be rezoned C2 Environmental Conservation. The Agile Planning team notes that although Senior's Housing is not listed as a permissible use</p>

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		<p>centrally within the site. The height adjacent to the neighbour to the west has been reduced from four storeys to three storeys which along with a 10m side setback will provide a sensitive transition to the neighbouring dwelling.</p>	<p>within the R2 Low Density Residential Zone in the KLEP 2015, it is permitted through the State Environmental Planning Policy (SEPP) (Housing) 2021.</p> <p>The R3 Medium Density Residential zone in the Ku-ring-gai LEP 2015 includes several more intensive residential uses (such as multi-dwelling housing and shop top housing). Given concerns raised around the location, density and built form outcomes of the site, the Agile Planning team recommends that the top half of the site maintains its current R2 Low Density Residential to ensure that seniors housing is delivered on site, and in an appropriate location.</p> <p>The Agile Planning team also agrees with the proposal that the site is excluded from Clause 84 and 87 of the SEPP (Housing). These clauses allow for development standard bonuses, particularly for height and floor space, above and beyond what is permitted in the KLEP 2015 and proposed under the planning proposal. Given the issues relating to bulk and scale, this part of the proposal will ensure that the built form won't be greater than that proposed within this planning proposal.</p> <p>Notwithstanding the above recommended changes, the Agile Planning Team considers</p>

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			that issues raised do not prevent the proposal proceeding to finalisation.
Heritage Assessment	<p>The current planning proposal doesn't adequately address the impacts the rezoning and subsequent redevelopment would have on Headfort House, the conservation area and adjoining heritage items. Additionally, the proposals lack of details means the proposal is inconsistent with the Ministerial Direction 3.2 Heritage Conservation.</p> <p>The planning proposal and supporting development controls do not facilitate conservation of listed and assessed heritage with the following key omissions and impacts:</p> <ul style="list-style-type: none"> The proposal does not include the heritage listing of Headfort House and its setting of assessed significance. The proposed height, proximity and density of development does not respect and conserve the significance of Headfort House and its setting, or the surrounding heritage items and conservation areas. 	<p>Under the planning proposal, Headfort House is proposed to be retained, restored, and enhanced. This is reflected in the draft site specific DCP. Updated heritage advice (Urbis) Attachment G9 concludes that that Headfort House does not have local significance that would warrant its listing as a local heritage item on the basis that it does not meet any of the seven relevant criteria for local heritage. It is also noted that Council is progressing a separate Planning Proposal to list Headfort House as a local heritage item.</p> <p>The proposed concept plan positions the larger scale development (5-6 storeys) toward the centre of the site. These buildings include modulated forms with upper-level setbacks, creating a terraced form to the south and reducing overall bulk and scale. This along with the 10m setback to three storey built form in this location will ensure a sensitive transition to the existing two storey dwelling within the conservation area. Heritage Impact Assessment (Urbis 2022) confirmed that the proposal would have an acceptable heritage impact.</p> <p>As part of the updated heritage advice (Urbis 2022), it recommended that the DCP be updated</p>	<p>Since the proposal was placed on exhibition, Headfort House was gazetted (20 January 2023) as an item of Local Heritage significance (item I184).</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>The Agile Planning team is satisfied that no further action is required at this stage in relation to this matter raised relating to heritage.</p>

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	<ul style="list-style-type: none"> There are no provisions in the development control plan for conserving the significance of Headfort House and its setting, or the surrounding heritage items and conservation areas. 	to include an objective seeking to ensure a transition between the redeveloped site and the natural bushland and heritage conservation areas and items located round the site.	
Ecology Assessment	<p>The ecological assessment is deficient in that it does not validate or map the extent of the onsite vegetation communities. Additionally, the assessment does not contain an impact assessment that acknowledges the threatened species of plant or animal that would be impacted by the redevelopment of the site. It is noted that the redevelopment of the site will result in the removal of 59% of on-site trees, 85 categorised as of high importance, and the potential disturbance of 37% of the remaining trees.</p> <p>The ecological assessment makes mention of the assessment of significance under the Threatened Species Conservation Act 1995 (TSC Act), however No assessment of significance is contained within the ecological assessment and the TSC Act has been repealed and replaced with the Biodiversity Conservation Act 2016.</p>	<p>A Biodiversity Development Assessment Report (BDAR) has been prepared as part of the response to submission by ACS Environment (Attachment Q3). The BDAR notes that the site has been extensively modified, however, still contains some patches of remnant tree and shrub species. Areas identified containing Sydney Turpentine Ironbark Forest communities and Swift Parrot habitat around the peripheries of the site to be zoned C2 Environmental Conservation will not be removed and will be managed for conservation purposes. On this basis it is considered that any ecological impacts associated with the proposal would be minimal and could be offset through purchasing ecosystem credits. An updated BDAR would be prepared at the development approval stage to confirm any impact and required ecosystem credits or monetary contributions.</p> <p>No habitat to be removed is considered suitable habitat for any threatened species as the potential habitat to be removed is largely</p>	<p>The proponent has revised the planning proposal package to address the concerns raised relating to the ecology on site. This included the introduction of a C2 Environmental Conservation zone to protect areas highlighted as important habitat by EHG.</p> <p>The Agile Planning team note that while the proposal will result in the loss of some existing vegetation on site, the proponent has presented several solutions to retain high biodiversity value areas and offset the loss of the other vegetation. Although EHG still have unresolved issues with the BDAR submitted by the proponent, they have supported this approach.</p> <p>The Agile Planning team is satisfied that the issues relating to ecology assessment and biodiversity have been addressed by the proponent and do not prevent the proposal progressing to finalisation.</p>

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	<p>The canopy coverage within the site exceeds the maximum of 15% as set out in PBP 2019. Any management of vegetation in the southern portion of the site will result in the removal of native vegetation mapped upon the NSW Biodiversity Vales map.</p> <p>The ecological assessment fails to consider direct and indirect impacts upon the downstream environment which supports habitats for threatened species, such as the potential hydrological changes resulting from the redevelopment of the site.</p>	<p>modified and managed. On this basis it is considered that any ecological impacts associated with the proposal would be minimal and could be offset through purchasing ecosystem credits. An updated BDAR would be prepared at the development approval state to confirm any impact and required ecosystem credits or monetary contributions.</p> <p>The Bushfire Report (Blackash Bushfire Consulting December 2022) confirms that that proposed landscape approach will provide a fuel reduced area between the buildings and the bush fire hazard. A performance-based approach has been proposed to manage the bushfire risk on site. This approach includes designing and engineering solutions to manage the risk, rather than the removal of trees.</p>	
Transport and Traffic Assessment	<p>The site is located within an existing low density residential area predominantly serviced by private vehicles. There is a single bus route that services the site, which provides links to East Killara and Lindfield Station, however these locations don contain basic services and facilities such as supermarkets and medical centres. The location of these services is outside of a 10-minute/800m walking catchment and are therefore not</p>	<p>The existing bus services are considered suitable for seniors housing, which will be supplemented by additional private busses. There is potential to liaise with TfNSW to increase bus services to support growth over time.</p> <p>The RTA (now TfNSW) Guide to Traffic Generating Developments does not state that the rates for medium density residential flat buildings are based on sites located close to a retail/transport core. Therefore, the rates used</p>	<p>The original Transport Assessment (ARUP June 2021) indicates the proposal would generate up to 912 trips per day. A revised traffic response for the amended proposal was prepared by Arup (October 2023) (Attachment V) which noted that trips generated from the site would be further reduced based on the revised concept plan.</p> <p>The site is currently serviced by a public bus route and future shuttle services catering for the retirement village and RACF can be</p>

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	<p>considered to be manageable walking distance for residents of this site. In is Council's experience there are no mechanisms to mandate private services and often they are not realised or dwindle over time.</p> <p>The Transport Assessment (Arup June 2022) estimates the traffic generation for the townhouses, based on traffic generation rate for medium density residential flat building. While the building typology of the townhouses is that of medium density residential flat buildings, the location factor would likely result in the townhouses generating more traffic, similar to a low-density residential dwelling. Therefore, the traffic generated on site would be more than what is included within the assessment.</p> <p>As part of council's Bushfire Evacuation Risk Assessment, the existing Stanhope Road catchment area has an effective total of 256 dwellings, exceeding the recommended maximum 50 dwellings for the one exit road by 206 dwelling. The amendments sought by the proposal would increase total to 330 dwellings, exceeding the recommended maximum by 280 dwellings. This figure could</p>	<p>are the most appropriate ones to use. The overall traffic generation of the site is expected to be less than 100 vehicles per hour. Furthermore, access to parking for the aged care facility and apartments has been amended to be split between two main access points. The Transport Assessment (Arup June 2022) concludes that the site is expected to generate more traffic than the existing case, however these increases are minimal.</p> <p>The bushfire strategy for the aged care facility residents is to remain in-situ, while the strategy for independent living unit (ILU) and town house residents would be to evacuate to a refuge building located on the site. Notwithstanding this, should the residents want to evacuate, the road network can accommodate the traffic, both accessing and exiting, the site.</p>	<p>identified in accordance with the requirements of SEPP (Housing) 2021 as part of any future development approval stage.</p> <p>Testing supporting the proposed concept plan shows that, in emergency situations, there is capacity in the existing and proposed road network to support emergency egress and access to the site.</p> <p>In their submission for the proposal, Transport for NSW (TfNSW) have not identified any issues in terms of traffic impacts resulting from the redevelopment of the site nor the modelling used to prepare the traffic study.</p> <p>The Agile Planning Team considers that traffic and parking has been adequately addressed at this stage of the planning proposal and the issues raised do not prevent the proposal proceeding to finalisation.</p>
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	<p>increase once a final design is submitted at the development approval stage. The amendments sought by the proposal would increase the number of dwellings within the Lourdes Retirement Village, increased a use identified as a special fire protection purpose within an area that already exceeds the recommended number dwellings.</p> <p>Council is concerned that the additional increase in dwellings, occupied by residents who are highly vulnerable to the effects of bushfire, will be difficult to evacuate and are more susceptible to smoke impacts, resulting in additional and high demand on emergency services, particularly if evacuation is required.</p>		
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