

Application No. SSD-47105958

Location: 24A Kingscliff Street, Kingscliff

Amy Watson

C/- Amber Nehal

NSW Dept Planning, Housing and Infrastructure

ATTN: Amber Nehal



The assessment outlines my review of the SSD application (SSD-47105958) reports and accompanying material. This includes a review of:

- Traffic Impact Assessment prepared by PTC
- Green Travel Plan prepared by PTC
- Architectural Plans prepared by PLUS
- Landscape Plans prepared by Urbis
- Consultation Report prepared by Ethos Urban
- Access Report prepared by Purple Apple Access
- Infrastructure Report prepared by ADP
- Visual Impact Report prepared by Ethos Urban
- View Loss Assessment prepared by Ethos Urban
- Flooding Assessment Report prepared by Venant Solutions
- EIS Prepared by Planit Consulting.

I provide the table overleaf which outlines the elements I feel are relevant to be raised to the assessing authority and stakeholders. I have also attached my previous comments issued to the proponent on 19th April 2023, which in my view were not adequately considered through the consultation phase, updates to the development and specialist reports. In summary, my key issues relate to:

1. Bulk and scale which is highly inconsistent with the surrounding area and planning policies allowing this provision
2. Height impacts and design filling the site and misrepresenting existing ground levels and height calculations
3. Traffic impacts at key access points and intersections
4. Lack of any active transport facilities to address existing deficiencies and accommodate the development's specific users
5. Parking provision particularly for staff and construction workers
6. Conflicting design elements along the access handle to Kingscliff Street
7. Loss of existing trees along the access handle and mis-representation of this across the various reports
8. Inaccurate design cross sections
9. Church land use not addressed

10. Deep planting areas inconsistent with landscape and visual details
11. Pervious and Deep Planting area calculations using parking areas
12. Privacy impacts to neighbouring properties
13. Shadow impacts to neighbouring properties
14. Flooding impacts as a result of the proposal
15. Lack of civil engineering detail or report
16. Lack of detail or misleading visual representations.

Given the significant number of non-conformances, concerns and issues across various aspects of the proposal, I do not support the proposed development in its current form.

I would also request the opportunity to review and provide feedback on the various changes and subsequent updated reports in response to this and other submissions.

Regards,



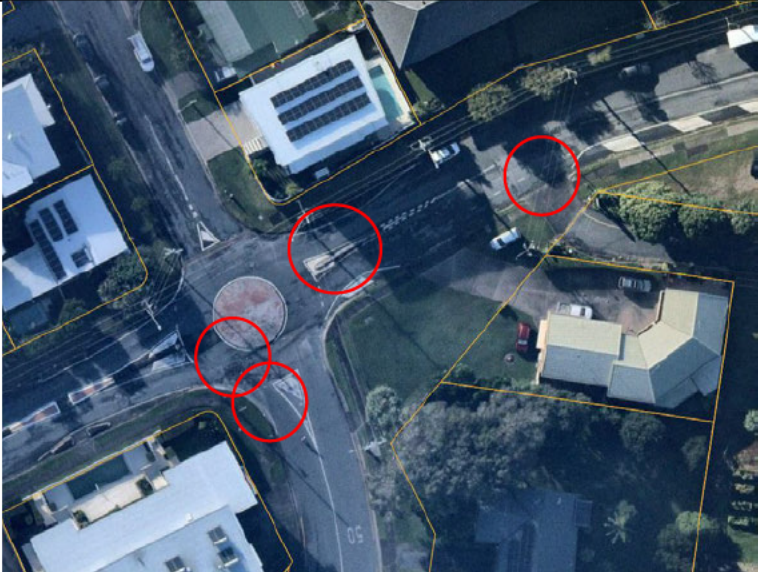
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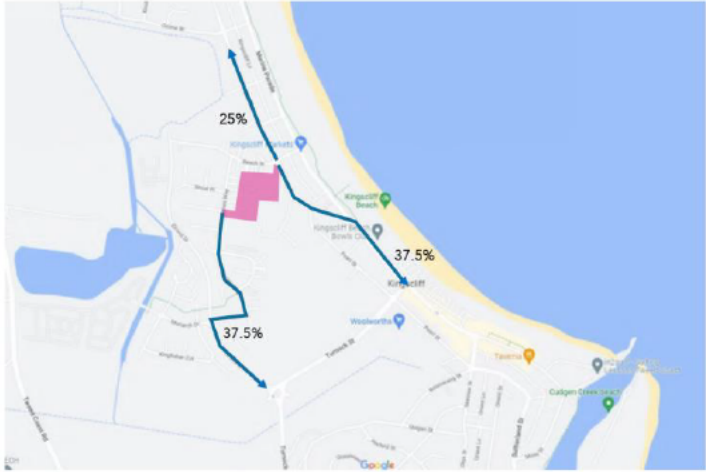
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Resident- Drift Court Kingscliff

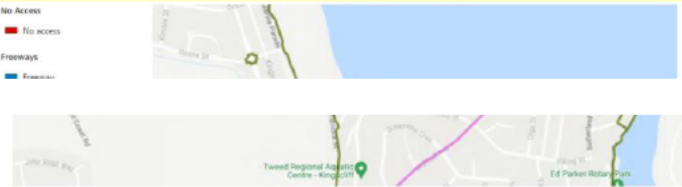
Table 1 - SSD-47105958 Special Report Reviews and Comments

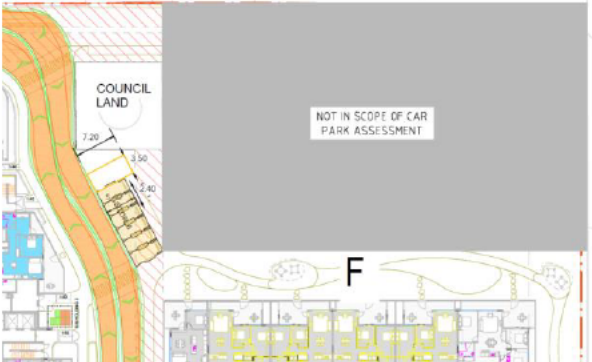
SSD Report Source	Issue / Comment	Item / Reference
Traffic Impact Assessment (TIA) – Prepared by Ptc.	1. Generic and High Level Traffic Impact Assessment The TIA undertaken by PTC includes a series of errors and omissions and does not fully address the traffic and transport aspect of the proposed development. Overall, it is clear that the SEARS Item 10 is not addressed within the submission and further responses are required including: 1. Change / updates to the development proposal 2. Changes to the TIA to address the site specific issues and respond to SEARS 10 requirements 3. Coordination with other reports to maintain consistency across the proposal 4. Design and competing demands of the Kingscliff St access handle 5. Identification of infrastructure needs to mitigate the impacts of the development and address issues to accommodate the development 6. Consultation with transport authorities including Tweed Shire Council and Transport for NSW	The site is surrounded by local roads, however, has relatively direct access to the regional and state road networks to distribute traffic. Public and active transport options in the area are limited, however do exist and are available for use. The proposed development meets the minimum required quantum of parking in accordance with the SEPP (Housing) 2021, and parking is designed in accordance with the relevant Australian Standards. Vehicular access and circulation has been assessed and found to be suitable. The traffic generated by the site has been determined and analysed in the context of the surrounding road network and found that the proposed development has no significant impact to the surrounding road capacity or performance.
Traffic Impact Assessment (TIA) – Prepared by Ptc.	2. Existing Traffic network and hierarchy is generic and too high level. The review of the existing road hierarchy is generic and too high level as it <u>does not review the local road context surrounding the site</u>. The report identifies all surrounding roads as merely “local roads” only in a state road context. The TIA’s review of the existing traffic situation is considered generic and does not review or identify the specific operations relevant to the proposal. <u>Particular attention should have been made on the specific frontage roads, routes, existing issues / operations including but not limited to on-street parking near driveways, access and queuing concerns at the existing Kingscliff Street access handle and driveway crossover, Beach Street / Lorien Way intersection sight lines to name a few.</u>	3.1 Road Hierarchy The subject site is located in the suburb of Kingscliff and is directly served by primarily local roads, managed by Tweed Shire Council. The Pacific Highway (State) and Tweed Coast Road (Regional) provide connection to the site from further afield.  Figure 4: NSW Road Hierarchy (TNSW NSW Road Network Classifications)

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Traffic Impact Assessment (TIA) – Prepared by Ptc.	3. Existing operations and road conditions not addressed The TIA stays silent on the poor condition of the exiting Kingscliff Street / Beach Street roundabout and the development's impact. This includes: • Poor alignment and sight lines from Kingscliff Street to Beach Street (west) approach • pot holes, rutting and poor surface conditions requiring regular maintenance • lack of pedestrian crossing facilities and footpath connections considering the prominent location and connection for residents to the foreshore pathway • close proximity and operational and alignment concerns with respect to the Uniting Kingscliff one-lane site access driveway handle. • Road reserve and service locations in proximity to the intersection • Review of queues for the purpose of locally validating the Sidra Models to on-site conditions. It is also noted that future road planning and forecasts (as identified in this review) may necessitate the upgrade of this intersection and utilisation of the available road reserve. This may impact the alignment, location and interaction with the proposed driveway access handle on Kingscliff Street. Concerns were previously raised with Uniting during the consultation phase regarding the driveway access and adverse peak period queuing, particularly involving service vehicle operations entering the site. This aspect has not been addressed by the proposal.	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	4. Lack of Road Safety Review The traffic report includes a high level online assessment of historical crashes using state mapping. <u>No consultation with Council or on-site observations appear to be undertaken to inform the road safety review.</u> As advised above, the condition and operation of Beach Street / Kingscliff Street intersection and its relationship with the subject sites access handle have been overlooked.	TIA lacks on site Road Safety Review
Traffic Impact Assessment (TIA) – Prepared by Ptc.	5. Existing Church land use not considered in TIA <u>The TIA does not mention or assess the existing Church land use located on the site and its contribution to traffic, parking and service vehicle movements utilising the site.</u>	Church Land Use on the site not assessed

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	<u>The traffic generation, distribution and modelling should be updated to reflect more accurate assessment of the sites traffic and mitigate against identified impacts.</u>	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	8. Traffic Distribution not representative of site conditions <u>The traffic distribution does not consider the existing movements from the site as well as potential new links in future years.</u> On this basis, it is likely that the assumed traffic distribution underestimates right turning trips into the site from Kingscliff Street. It is recommended that the traffic assessment be reviewed with closer consideration to existing travel patterns and future road linkages (future assessment). This should include a review of Council’s TRCP and TRDS (2017) which includes a number of east-west link roads connecting to Tweed Coast Road.	 Figure 18: Network Peak Hour Outbound Distribution
	9. Base Sidra Queue Validation <u>No review of existing queues at Beach Street / Kingscliff St or Kingscliff St / Site Access have been undertaken for the purpose of calibrating and validating the Sidra Models to existing conditions.</u> The Sidra Analysis and TIA needs to be updated to demonstrate that the traffic models are developed in accordance with TfNSW guidelines and accurately represent existing conditions.	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	10. Non-Legible Turn Movement Diagrams <u>Traffic turn movement diagrams are not legible within the TIA</u> and also require updates based on the identified flaws within traffic generation and traffic distribution. It is recommended that any updates to the turn movements are clearly shown in the revised TIA	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	11. Traffic Growth Rate The TIA applies a broad 2.0% p.a. growth rate to background traffic to assess the development’s 10 year design horizon. <u>This rate does not accurately consider the forecast traffic growth on surrounding key roads including Kingscliff Street and Beach Street as a result</u>	

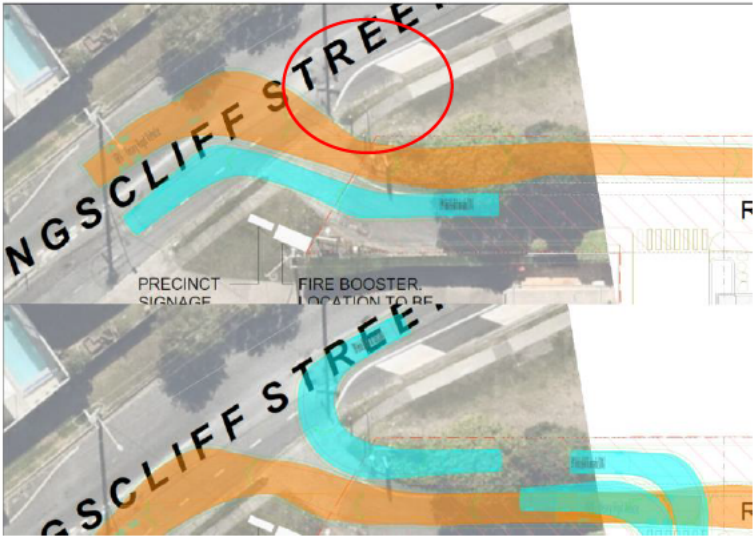
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	of the nearby land releases and associated new road links to Tweed Coast Road. <u>It recommended that the proponent liaise with Tweed Shire Council on the future traffic projects for the area and apply more realistic forecast traffic growth rates as outlined within Council's latest forecast traffic modelling for the area</u>	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	12. Future Year Assessments – Incorrect Years The traffic analysis was undertaken for using 2022 survey data. The TIA suggest post opening under a 2022 year assessment, plus 10 years (2032). <u>This modelling approach is not correct as it does not accurately assess the year-of-opening or +10-year design horizon.</u> The TIA must increase background traffic growth and assessment to represent the “Year of Opening” following the final stage and then plus 10 years. Following application, approval, design and a circa 4-year construction period. Full development year of opening of the final stage is not expected to occur until at least 2029-2030. <u>Traffic Analysis should therefore be undertaken considering background traffic ground to this year of opening as well and +10years (circa 2040).</u> It is expected that the increase in background traffic growth would result in a higher proportion of vehicle queuing on Kingscliff Street at both the site access and Beach Street roundabout.	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	13. Future Road Links not considered <u>The TIA does not consider the future planning of the surrounding road network.</u> Reference is made to Tweed Shire Council's Tweed Road Development Strategy and their ongoing forecast planning which outlines a series of new road links in the region which will change traffic distribution in the surrounding area, particularly for Beach Street, Lorian Way and Kingscliff Street. The forecast traffic growth assessment does not consider these road as well as future developments surrounding the site.	Forecast growth and transport network planning not addressed
Traffic Impact Assessment (TIA) – Prepared by Ptc.	14. Active Transport Network and developments impacts / contribution not considered <u>The TIA's review of existing active transport facilities connecting the site to nearby destinations is generic and does not consider Tweed Shire Council's Walking and Cycling Plan (2024), which was open for consultation during the TIA report preparation period.</u> Reference is made to Council's report and its deficiencies raised in close proximity to the subject site along and crossing Kingscliff Street, Pearl Street and Beach Street. The TIA remains silent to	3.3 Active Transport The locality has also been assessed for potential active transport such as walking or cycling options. The vicinity of the site has been assessed to comprise of adequate but incomplete pedestrian infrastructure with potential for improvement. Site frontage roads have footpaths, whilst some surrounding streets are lacking pedestrian infrastructure. Furthermore, there is limited crossing infrastructure to assist particularly vulnerable pedestrians with roadway navigation.

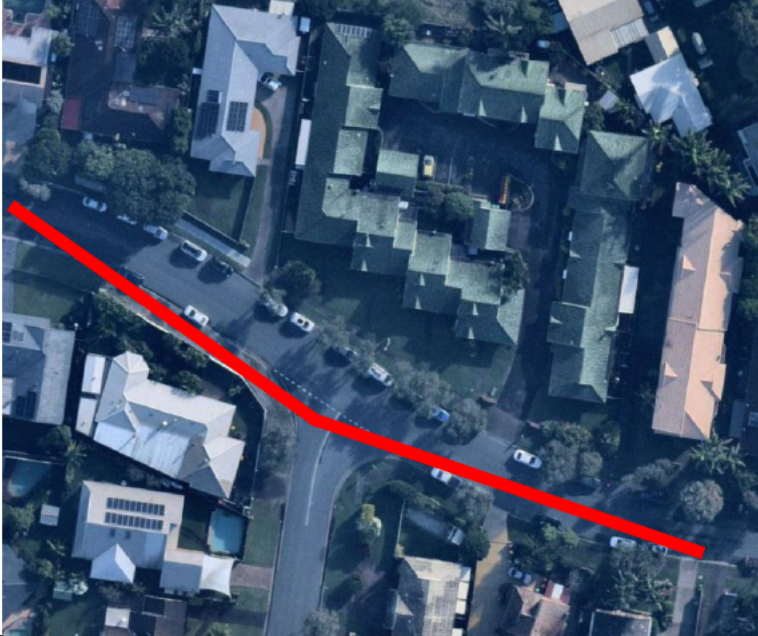
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	existing deficiencies to pathways and crossing facilities, however uses the sites location to justify the proposal. Given the proposal's objective to connect its residents to the community and 'active lifestyles', the TIA and proposed development as a whole does nothing to mitigate against these existing identified pedestrian crossing barriers, particularly given the proposal's aged residential community and high proportion of vulnerable users. <u>It is recommended the report be updated to more accurately address and recommend pathway and crossing treatments (external to the site) to accommodate the planned increase in usage by vulnerable users associated with the proposed development. The proponent has an opportunity and has been advised about these aspects during the consultation phase. The lack of any facility upgrades or even a mention shows complete disregard for the actual end users of the facility and their 'connectivity' to the surrounding community.</u> Reference is made to other recent major projects in the Tweed and North Coast region which have been conditioned to upgrade and provide new pathway links and crossings. There is a clear nexus between the proposed development and its direct need to upgrade pedestrian crossing and pathway facilities surrounding the site.	Cycling amenity has also been assessed with the TfNSW Cycleway Finder as shown in Figure 12. The local roads surrounding the site are expected to have limited through traffic, and are expected to be reasonably safe for cyclists. Off road cycling routes are provided along key routes including the beachfront, which makes cycling an attractive mode of transport to reach further afield particularly up and down the beachfront.  Figure 12: Cycleways (TfNSW Cycleway Finder) It is expected that given the surrounding public and active transport options, staff and visitors to the site would be able to make journeys to and from the site with a reduced requirement for private transport. Additional footpath connections or crossings in the vicinity of the site would be beneficial to increase the attractiveness of active transport.
Traffic Impact Assessment (TIA) – Prepared by Ptc.	15. Intersection Modelling and Impacts As previously identified, no Sidra model queue validation has been undertaken for base models. Kingscliff Street / Beach Street intersection are in close proximity and observed to experience “queue back” from the existing site access intersection. The TIA includes assessments of these intersections in isolation and also for incorrect model years and forecast growth. <u>These intersection assessments should be undertaken in Sidra Network</u> to understand the likely queuing interaction and any exacerbation associated with the proposal. In addition, pursuant to the items raised above, the traffic modelling should be updates to reflects changes to: • Traffic Generations • Traffic Distribution • Forecast Traffic Growth and correct model years.	Sidra Traffic Analysis

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Traffic Impact Assessment (TIA) – Prepared by Ptc.	16. Turn Warrants Assessment <u>No Turn Warrants Assessment has been undertaken for the site access of the Collector Road (Kingscliff Street).</u> Considering the existing queuing issues and close proximity of the site access on Kingscliff Street to Beach Street roundabout, a turn warrants assessment (in coordination with the Sidra Assessments) should be undertaken to determine if upgrades and treatments are required at this location. These need to be undertake for the correct future years as advised above (i.e. 2028-29 and 2038-39)	Turn warrants Assessment at Kingscliff Street entry
Traffic Impact Assessment (TIA) – Prepared by Ptc.	17. Service Vehicles and Waste Collection Vehicles The TIA refers to waste collection in loading bays. It is noted that the plans show waste bins located throughout the development but are not serviced. The TIA does not identify whether side loading or front loading vehicles are being used. It is noted that both vehicles require different vertical clearance <u>exceeding 4.5m clearance</u> at collection points internal to the site. <u>In addition, service vehicle and waste collection vehicle frequencies are not addressed. It is noted that existing service vehicle frequencies at the existing site already cause amenity concerns to neighbours due to both frequencies and hours of operations. Further details are required and subsequent conditions be imposed limiting the frequency and time of day operations for service vehicles.</u>	6.3.3 Headroom Clearance The basement carpark is generally required to have a minimum headroom clearance of 2.2m to accommodate passenger vehicles. A minimum headroom clearance of 2.5m shall be provided above all accessible bays, shared bays and shared areas adjacent to the accessible bays located within the parking aisles. A minimum headroom clearance of 4.5m shall be provided within loading docks, loading bays and any areas accessible by heavy vehicles. All headroom clearances are to be measured to the underside of the lowest overhead obstruction (e.g. awnings, lighting fixtures, sprinklers, ducting, utilities etc.). 6.3.4 Loading Dock Provision for up to a 12.5m HRV is made at the loading dock area. In accordance with AS2890.2, the service vehicle bay is to be 3.5m wide by 12.5m long. It is found that the dock area provided is suitably in accordance with AS2890.2. Where access is required by heavy vehicles, all grades are to comply with the provisions of Table 3.2 of AS2890.2: 2018 Off-street Commercial Vehicle Facilities. All access within the loading docks and along heavy vehicle travel paths are to be designed for the largest design vehicle (i.e. HRV). 6.3.5 Waste Collection Waste collection is anticipated to make use of the service vehicle bay and loading dock. All service and refuse vehicles are required enter and exit the site from Kingscliff Street and all internal site roads along this route are capable of accommodating up to and including 12.5m HRVs. Refer to Attachment 5.
Traffic Impact Assessment (TIA) – Prepared by Ptc.	18. Church Parking Area Design does not comply and not assessed <u>The proposal includes a blind traffic aisle within the church car parking area and does not include a turn-around area. These aspects were not addressed in the TIA.</u> It is clear from the TIA that the consultant was given a directive not to address this by the proponent for some reason which remains unclear. Any changes to the parking area need to be assessed and comply with AS2890. <u>The proposal in its current form does not comply to AS2890</u>	Church parking area not assessed  The diagram is a site plan showing a church building at the bottom, labeled with a large 'F'. To the left of the church is a parking area with several car spaces. A road or path runs along the left side of the parking area, with a label 'COUNCIL LAND' pointing to the area beyond it. A large grey rectangular area is overlaid on the plan, with the text 'NOT IN SCOPE OF CAR PARK ASSESSMENT' inside it. Dimensions are marked on the plan: 7.20, 3.90, and 2.40. A north arrow is located in the top left corner of the plan.

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Traffic Impact Assessment (TIA) – Prepared by Ptc.	19. Church Parking Area Surface Issues <u>A large proportion of the church car park is identified as grassed surface in order to achieve permeable surface calculations and Deep Planting Zone. This surface does not comply with Council's DCP or AS2890 which requires parking areas to be sealed. The notion of trying to justify deep planting and pervious areas within this car park surface is concerning.</u> The church and car park levels are notably lower than the surrounding site and expected to experience overland floor into this area and pooling. This aspect is particularly relevant for the church car park with users being visitors and a high percentage being elderly and vulnerable users. The proposal will introduce potential trip hazards for these users and given the low lying nature compared to the rest of the site and common use by vehicles, its very likely to produce rutting, mud and water pooling in the parking area.	6.1 Vehicular Access and Circulation Access to the site is provided from both Kingscliff Street and Lorient Way. Larger service vehicles (including 12.5m HRV) are required to access and egress the site via Kingscliff Street due to design constraints and the nature of the surrounding roads. Circulation within the site at-grade is undertaken on a two-way shared zone carriageway, which has been assessed and deemed suitable to accommodate the design vehicles. Refer to Attachment 5. As a shared zone, a 10 km/hr speed limit is to be implemented with signage. All pedestrian crossings within the site shall be signposted in accordance with AS1742. Basement access is provided by two ramps located throughout the site. All basement parking is for residents or staff, and as such has been assessed according to this user classification. In accordance with AS2890.1 Section 2.4.2(c), private car parking areas with blind aisles are required to have a minimum 1 metre aisle extension. No provision is required for turning bays in blind aisles in private car parks.
Traffic Impact Assessment (TIA) – Prepared by Ptc.	20. Community bus use and conditioning to ensure use The TIA and Green Travel Plan (GTP) identifies the use of two on-site mini buses to support residents travel for those without a vehicle or unable to drive, which is a positive outcome and in line with expectations for this type of facility. There is a risk that this facility is just mentioned within a TIA to substantiate vehicle trip and parking rates proposed, but later removed or not provided at all. <u>In order for this transport outcome to be provided, it is recommended that these vehicles be conditioned to be provided and maintained by the operator of the site.</u>	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	21. Staff Parking Rate and impacts The staff parking rate references 1 space per 2 staff. For the nominated 51 staff on-site the proposal provides a total of 28 parking spaces. <u>This provision does not consider the existing nature of the site and current mode share.</u> Given the existing operations of the site, it would be more appropriate to base parking requirements (in particular for staff parking) on existing operations and parking surveys, noting that public transport is not a major transport mode share in the region and parking is readily available for the existing operation. The parking assessment therefore does not represent the true parking demands associated with staff parking needs including peak period change	Nonetheless, it is appreciated that staff work shift hours, and the limited bus services may not provide adequate connectivity to and from the site to make this an attractive option.

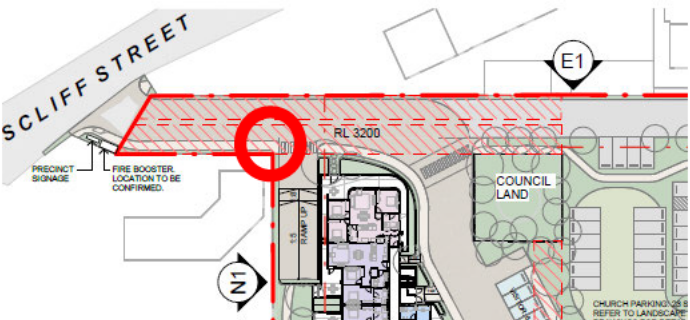
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	over demands. In the absence of this information, the proposed parking provision for staff is considered low for this particular site and would result on on-street parking pressures along Lorian Way and Beach Street and Kingscliff Street. The nominated parking provision is less than one space per unit. The TIA does not discuss the allocation of parking spaces over the site for various unit sizes and the various operations. This poses a risk to on-selling or locking down parking on the site for specific units or uses, restricting the use of parking spaces to accommodate the true demands of the facilities. For example, units may be sold with multiple spaces (for a profit), then limiting staff, visitor or church parking on the site to the detriment of the surrounding community. Given the existing on-street parking utilisation at this location, concern is raised for on-street parking extending to influence driver sight lines at critical priority intersections of: • Beach Street / Lorien Way • Lorien Way / Shoal Place • Lorien Way / Channel Place	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	22. Site Access via Kingscliff Street The driveway access via Kingscliff Street was identified through the consultation phase as non-compliant for accommodating two-way movements and service vehicle operations. No detail is provided in the TIA or Architectural Plan regarding the new driveway crossover design and compliance to Australian Standards and Council's Driveway Design Specification. <u>The TIA does not consider the Council maintenance vehicles to access the sewer pump station or internal Padmount and any needs to accommodate larger vehicles such as and Articulated Vehicle (AV).</u>	

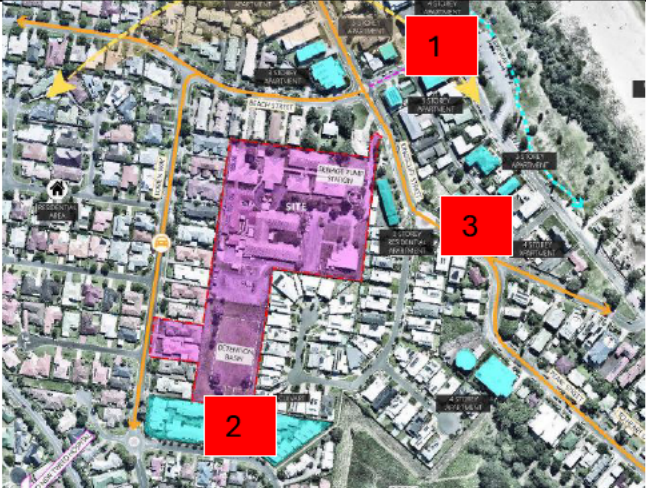
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Traffic Impact Assessment (TIA) – Prepared by Ptc.	23. Driveway Designs Specifications <u>The TIA does not discuss or assess the driveway construction requirements at Kingscliff Street or Lorien Way in line with Council's Driveway Specifications. Specifically:</u> • Service Vehicle turn paths do not show a vehicle turning left into the site however the TIA identifies vehicles access and egress the site from this direction. • Pedestrian sight triangles are not provided on both sides of the driveway for commercial vehicle movements • Landscape (trees) and fences are located hard up against the driveway at the property boundaries • Driveway widths and pedestrian crossing facilities, particularly on Kingscliff Street • Driveway detail – will this include crossover design or kerb returns as shown on the plan? • Precinct Signage and Boosters are located on the public roadway and should be located wholly within the site. • Location of boom gates and turn around facilities. Overall, it is clear that the design specifications are not met and unlikely to be met at Kingscliff Street access due to the competing demands (i.e. vehicle movements for service vehicles, pedestrian path, service booster, driveway specification, site signage, not to mention the expected retention of established trees along the existing driveway. <u>These competing design requirements at the Kingscliff Street access handle clearly demonstrate that the proposed development is exceeding its use and cannot fully comply without compromising the safety, efficiency, facilities or amenity of the site or surrounds.</u> <u>Careful consideration should be given to the proposals increase in use of the Kingscliff Street access handle beyond its current use. With these combined considerations in mind and minimising the new impacts at Lorien Way, it is clear that the proposed yields and cumulative impacts of the proposal are too great for this site.</u>	 The image is an aerial photograph of a street intersection and surrounding area. Overlaid on the image are various colored lines and shapes representing proposed driveway designs and pedestrian paths. A red circle is drawn around a specific area on Kingscliff Street. Labels on the image include 'KINGSCLIFF STREET' (written twice), 'LORIE WAY', 'PRECINCT SIGNAGE', and 'FIRE BOOSTER LOCATION TO BE'. The map shows the layout of the streets, existing buildings, and the proposed infrastructure changes.

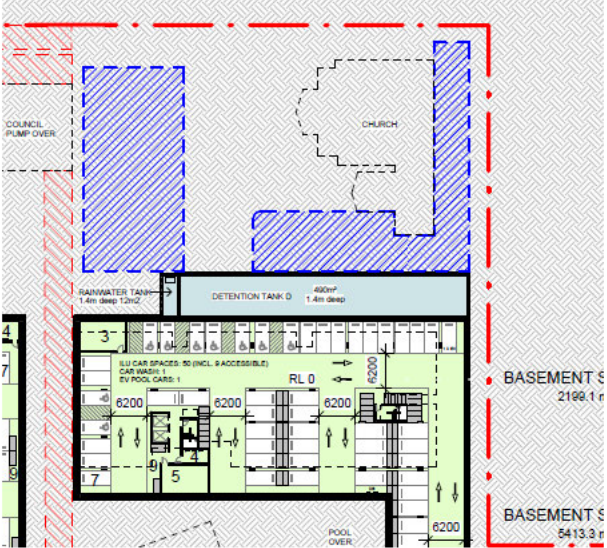
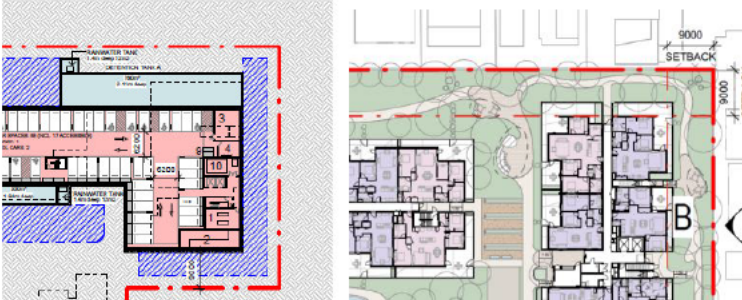
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	<u>It is recommended that the assessing authority carefully consider the cumulative impacts and what measures (through design and reduced yield) are required to achieve a compliant and acceptable outcome.</u>	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	24. Intersection Sight Distance Lorien Way / Beach Street priority-controlled intersection exhibits poor sight distance for right turn movements due to a combination of road alignment and on-street parking. Forecast traffic volumes as a result of future road linkages and development to the west is expected to exacerbate this issue. <u>This TIA does not consider this or review the development's further additional increase in traffic generation at this location. It is expected that mitigation measures would be required at this location in the future and the development would be a contributor.</u>	
Traffic Impact Assessment (TIA) – Prepared by Ptc.	25. Boom gate on Lorian Way and Kingscliff Street <u>The TIA states that boom gates are provided at the site entries on Kingscliff Street and Lorian Way. The Architectural plans and renderings do not show any boom gate control or turn-around facilities.</u> AS2890 requires that any boom gate controls provide sufficient turn-around facilities to ensure vehicles enter and exit the vehicle in a forward gear. This includes service vehicles and will also need to consider Council vehicles to access the Sewer Pump Station. The management of boom gate and vehicular control is not outlined and has the potential to restrict parking access by bona fide residents, visitors and staff to the site, therefore resulting in reliance on on-street parking (particularly along Lorian Way and surrounding streets).	6.4 Access Control Parking and site access will be controlled with security boom gates located at both entryways to the site.

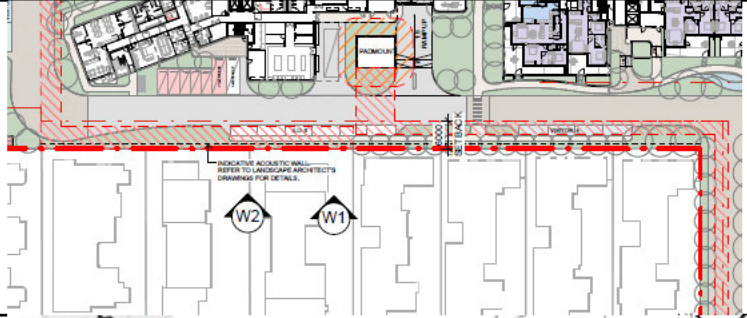
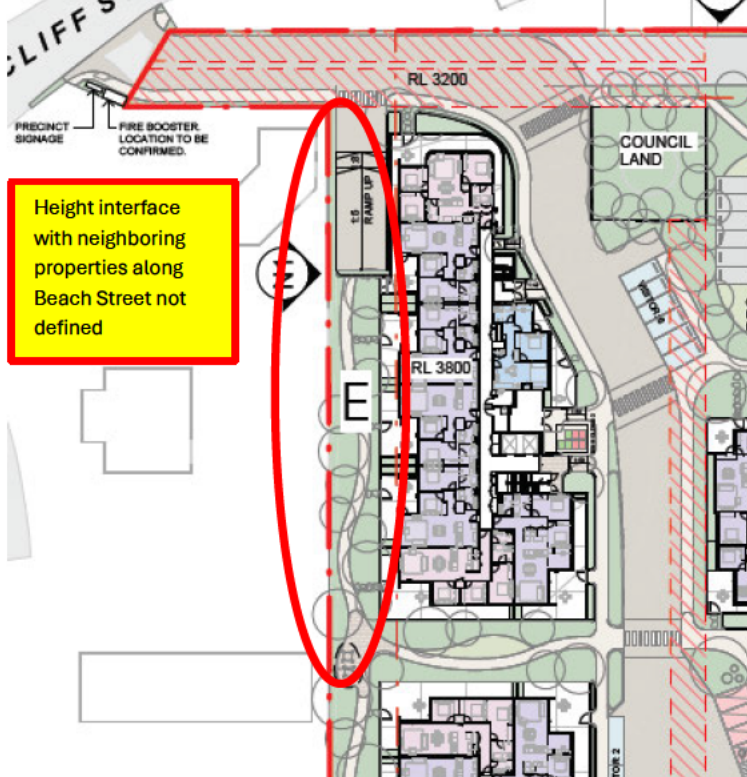
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Traffic Impact Assessment (TIA) – Prepared by Ptc.	26. Construction Traffic, Parking and Pedestrian Impacts Noting that the CTMP review is preliminary at this stage, the scale of the development and works required will have a significant impact on the surrounding community and required considerable traffic management measures over a lengthy period of time (years). In particular access and impacts to Kingscliff Street access handle and its poor alignment to Kingscliff Street is not addressed. This includes the delivery and movement of large plant, construction vehicles, fill, concrete pour deliveries and materials. Construction <u>worker parking will be a critical factor to address</u>. The TIA states limited construction parking will be available and “wherever practicable” car pool and alternate options are to be use! These statement’s do not address the expected issues that will occur as a result of construction staff parking surround the site. Given the long-term construction timing, these impacts need to be fully addressed and mitigated. <u>Any off-site staff parking needs to be clearly identified with access paths, parking areas, dilapidation surveys and “make good” requirements conditioned to ensure construction activities do not have a detrimental impact on the surrounding road, foreshore parking areas and verges around the site.</u> <u>The SEARS is therefore not considered to be addressed with respect to Construction Traffic Impacts and mitigation measures.</u>	7.10 Staff Parking Due to site constraints, there will be limited parking available to site personnel on site. To minimise the required parking, the contractor will be encouraged to inform workers of travel options to the site. All site personnel are encouraged not to park on street in the vicinity of the development site. Also, site personnel will be advised to carpool (wherever practicable) and will be informed of the alternative transport options available in the vicinity of the site and encouraged to utilise these facilities (wherever practicable). A public transport information pack is to be provided to all staff and contractors, advising them of the public transport options available.				
Traffic Impact Assessment (TIA) – Prepared by Ptc.	27. Car Parking Design The TIA states parking is provided at 2.4m width for residential, domestic, employee parking. This does not consider visitor parking to the residential component and church. <u>All designated visitor parking spaces should be widened as per AS2890.1 requirements.</u>	6.3 Car Park Arrangement 6.3.1 Typical Requirements The car parking requirements have been assessed against the requirements of AS2890.1:2004 with reference to Class 1A (residential, domestic and employee parking). Class 1A: <table><tr><td>Car Space Dimensions</td><td>2.4m x 5.4m (minimum)</td></tr><tr><td>Aisle Width</td><td>5.8m (minimum; two way aisles with parking on both sides)</td></tr></table> All parking spaces have been individually assessed and found to be compliant or can be made compliant with the minimum requirements of AS2890.1. All spaces are to meet the clearance requirements (door opening, entry flanges, column locations) of the parking space envelope requirements.	Car Space Dimensions	2.4m x 5.4m (minimum)	Aisle Width	5.8m (minimum; two way aisles with parking on both sides)
Car Space Dimensions	2.4m x 5.4m (minimum)					
Aisle Width	5.8m (minimum; two way aisles with parking on both sides)					

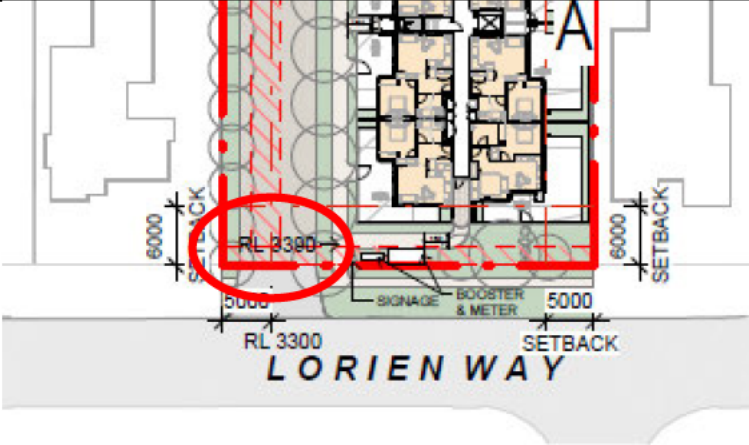
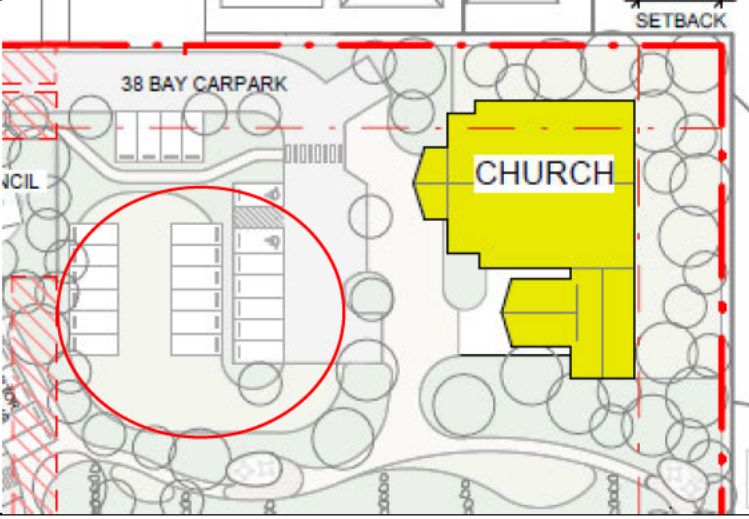
SSD Report Source	Issue / Comment	Item / Reference
Traffic Impact Assessment (TIA) – Prepared by Ptc.	28. TIA Conclusion <u>Overall, the TIA is considered incomplete due to a range of aspects raised above and recommended to be reviewed in coordination with changes in the development, consultation with transport authorities, a more thorough review of surrounding road issues (rather than broad network reviews), identify mitigation measures (both within and external to the site) and adequately respond to SEARS.</u> <u>It is recommended assessing authorities consider these above aspects before making a determination based on the material provide to date.</u>	8. Conclusion ptc. has been engaged by Uniting to prepare a Traffic Impact Assessment to accompany a State Significant Development Application (SSD-47105956) regarding the proposed redevelopment of the existing aged care facility located at 24A Kingscliff Street, Kingscliff. The Seniors Housing development proposal comprises of 199 independent living units (ILUs) and a 120 bed residential aged care (RAC) facility, that will be supported by a range of other services. The site is surrounded by local roads, however, has relatively direct access to the regional and state road networks to distribute traffic. Public and active transport options in the area are limited, however do exist and are available for use. The proposed development meets the minimum required quantum of parking in accordance with the SEPP (Housing) 2021, and parking is designed in accordance with the relevant Australian Standards. Vehicular access and circulation has been assessed and found to be suitable. The traffic generated by the site has been determined and analysed in the context of the surrounding road network and found that the proposed development has no significant impact to the surrounding road capacity or performance.
Green Travel Plan- Prepared by PTC	29. Green Travel Plan <u>The Green Travel Plan (GTP) has been reviewed and, similar to the TIA, provides a generic report</u> that does not adequately address the specific needs of the proposed development or mitigation measures required for this type of development and in this location. The following aspects of the GTP should be addressed: • Does not review or survey existing staff mode share and travel distances to help in informing GTP actions. It would be expected that existing surveys of staff as well as other Uniting Care sites would provide valuable information in understanding the specific needs and viability of the proposed actions. • The GTP acknowledged the site is surrounded by incomplete pathways and crossing facilities, but does not provide any infrastructure solutions to mitigate these concerns and assist in promoting active transport. This is both within the GTP and TIA. It is recommended that the proponent liaise with Council, staff and community groups (walking and cycling) to understand what opportunities are available provide targeted actions that can actually provide a tangible and measurable difference to transport mode-share and active transport usage for staff, residents and visitors to the site on an on-going basis. • The GTP refers to a 2014 PAMP by Tweed Shire Council, but fails to review the recent 2023 Walking and Active Plan which was out to public exhibition in Jan 2024. This new plan identified a number of key pathway and crossing facilities surrounding the site. The proposed	

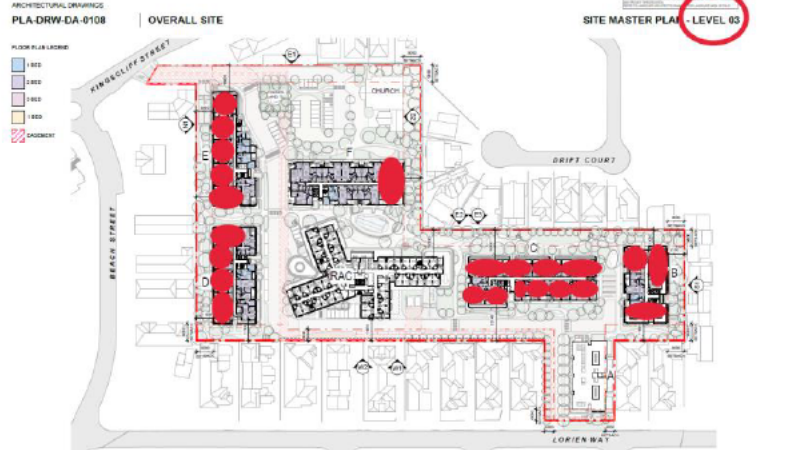
SSD Report Source	Issue / Comment	Item / Reference
	development has the potential to work with the community groups and Council to facilitate / fast track some of these needed upgrades but has not done so. Rather, the GTP merely expects that the implementation of facilities (by others, namely Council) would improve the uptake for their site. No responsibility or proponent contribution is proposed in the GTP to improve these active transport facilities. Given the limited budgets for improved walking and cycling facilities by Council, it is not expected that any facilities near the site will be delivered in the medium term. <u>Overall, the GTP fails to provide any actual project specific information to inform real actions that would have any tangible benefit to the end users of the facility. It is recommended that the GTP be updated in consultation with the existing staff, operator, council and other transport stakeholders.</u>	
Architectural Plans - Prepared by Plus	30. Tree Removal Along Access Handle to Kingscliff Street Existing survey plan shows established trees along existing driveway to Kingscliff Street on both sides. These are proposed to be removed as part of the driveway upgrade. This impact is not address in the EIS or visual impact assessment. <u>These exisitng trees and their proposed removal is not addressed in response to Items 6 and 8 of the SEARS</u>	
Architectural Plans - Prepared by Plus	31. Ramp and Pedestrian Sight Line Issue <u>The location of the exit ramp will result in vehicles exiting the ramp unable to see pedestrians travelling along the access handle to Kingscliff Street. This sight line issue is exacerbad by providing a pedestrian zebra crossing which provides pedestrian priority. This configuration conflicts with the outcomes of AS2890 and requires reconfiguration to offset the driveway away from the boundary and fencing line</u>	

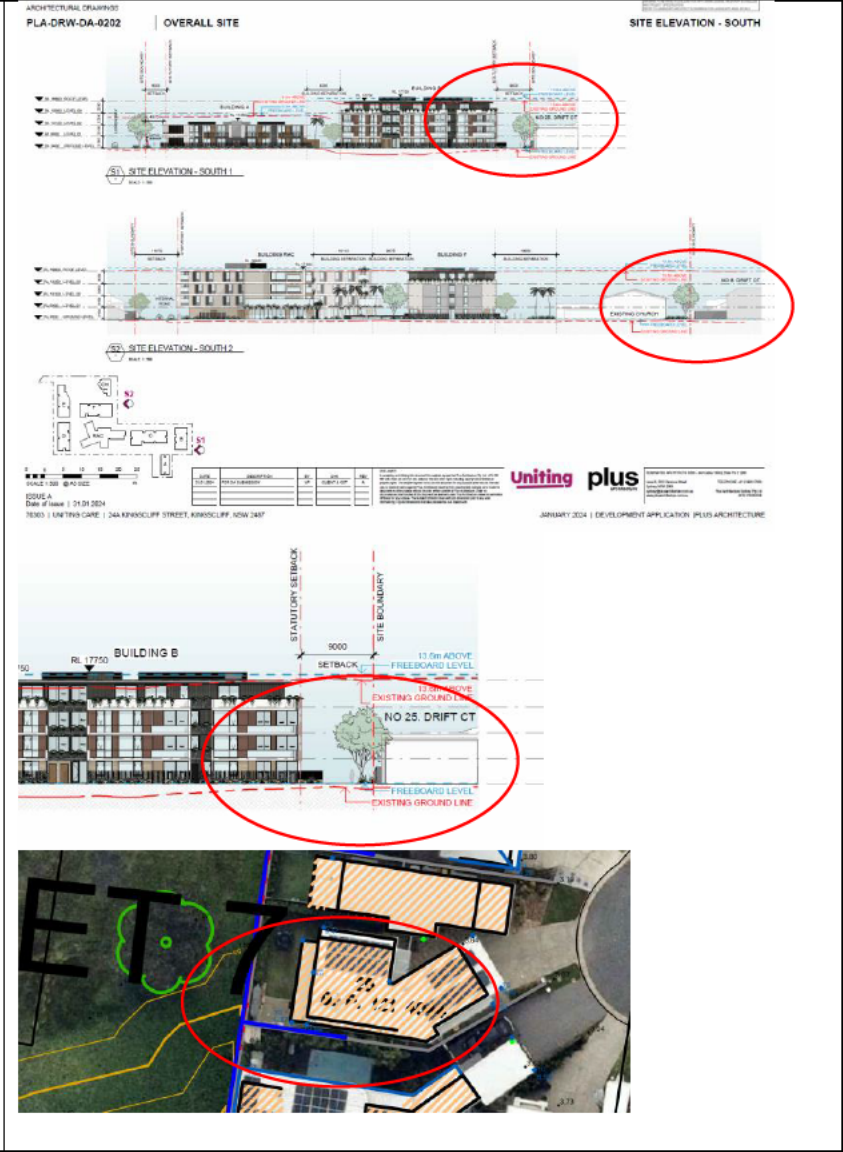
SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	32. Site Context Plans misinterpret surrounds to substantiate proposal The site context plan references other existing building types to demonstrate precedence of height and land use. <u>The report fails to provide actual context to these examples which demonstrate clear inconsistencies with the proposal.</u> These include: 1. Beach Street / Marine Parade examples include ground floor parking recessed into the dune / land scaping with three net levels of units above. Height is taken from 'natural ground level'. The proposal seeks to raise the ground level, then measure heights and levels which is incorrect and misleading. 2. The neighbouring retirement facility is predominantly single storey dwellings only 3. Example 3 on Kingscliff Street, includes ground level parking (no basement and includes the upper level designed into the roof structure façade, therefore reducing the perceived height of the development. It is recommended that site context plans are rectified to more accurately provide the correct context and subsequent differences the proposal has to the surrounding built area, as opposed to similarities.	  

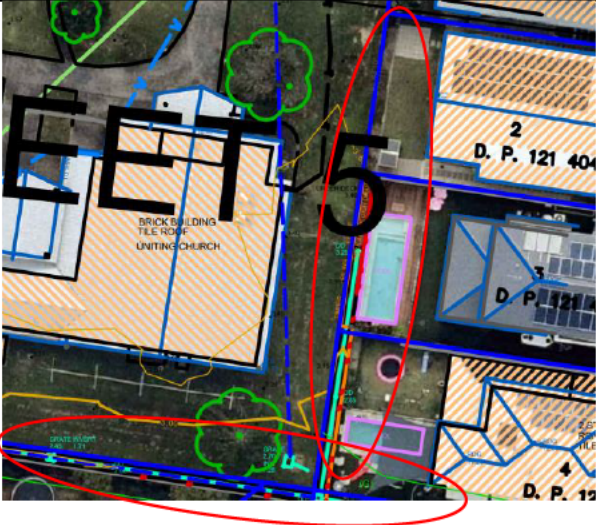
SSD Report Source	Issue / Comment	Item / Reference
		
Architectural Plans - Prepared by Plus	30. Deep Planting Zones and Detention basin near Church The plans show proposed deep planting behind the church and in the church car park area as well as detention basis directly adjacent. <u>The architectural plans conflict with traffic and landscape plans for this area along with the levels of both the existing church and surrounding neighbour walls.</u> <u>The deep planting zone in the car park includes proposed permeable grassed areas which does not comply to AS2890 in maintaining sealed and formalised car parks.</u> In addition, the low point of the site, landscaped batter over basins and basements will likely result in overland flow or pooling in the parking areas. This will result in maintenance issues as well as trip hazard issued for users of the car park (particularly the elderly users),	
Architectural Plans - Prepared by Plus	31. No Deep planting on South-eastern extent of site <u>The deep planting zone is not identified along the south-eastern corner of the site, however established landscaping is shown on the ground level landscaping plan.</u> It is unclear whether mounds on top of the detention tank are proposed to facilitate the level of landscaping proposed at these locations.	

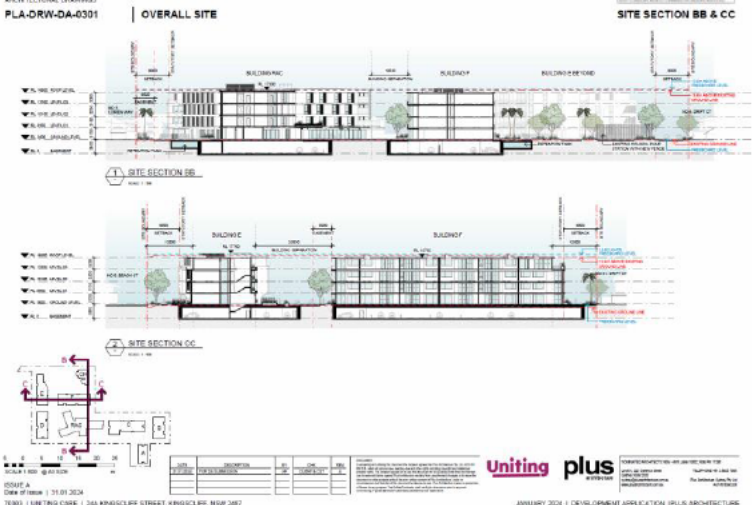
SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	32. Internal Padmount Station The plans show a padmount station internal to the site and therefore behind a boom gate. It is noted that Essential Energy has provide in-principle support for this location, however this is not yet approved by Council. It is understood that this infrastructure must be provided to be accessible from the public roadway to ensure maintenance as well as to be accessible to fire services.	
Architectural Plans - Prepared by Plus	33. Wall Interface along northern Boundary not detailed Heights and cross sections along the northern interface are inaccurate within the architectural plan package. Based on the existing survey which is not accurately represented in the plans, the interface will result in a wall and then fencing on top along this boundary. Inconsistencies with cross section, landscaping plan and lack of detail of flooding impacts at this location. <u>Specifically, the interface between ramp and driveway to the neighbouring property boundary is not clearly defined in architectural plans.</u>	 Height interface with neighboring properties along Beach Street not defined

SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	34. Lorien Way Frontage <u>The plans or 3D renderings do not accurately detail the requirements as outlined in the TIA including boom gate and turn-around facility as well as pedestrian sight triangles on both sides of the driveways.</u> This issue needs to be addressed across multiple reports including visual impact assessment and landscaping reports	 The diagram shows a site plan with Lorien Way at the bottom. A building footprint is shown with setbacks of 6000 on both sides. A red circle highlights a specific area near the driveway, with labels 'RL 3380' and 'RL 3300'. Other labels include 'SIGNAGE', 'BOOSTER & METER', and 'SETBACK'.
Architectural Plans - Prepared by Plus	35. Church Car Park Compliance Car park for church does not comply with AS2890. It includes a blind aisle and also large proportion of grassed aisle / surface. The configuration will result in uneven surface and muddy due to vehicle parking movements and positioned as the lowest part of the site. This configuration will also be a trip hazard for elderly / vulnerable users which are expect to make up a significant proportion of users. The church car park has also not been checked for service vehicles or hearse movements.	 The diagram shows a site plan with a '38 BAY CARPARK' and a 'CHURCH' building highlighted in yellow. A red circle highlights a specific area within the car park. Labels include 'SETBACK' and 'COUNCIL'.

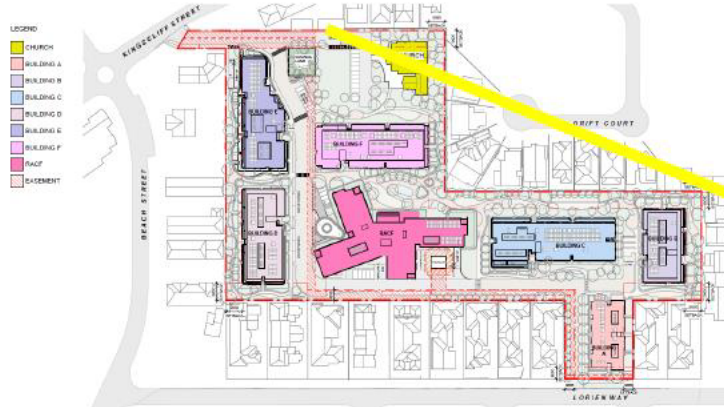
SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	36. Building Height Justification and Impacts <u>The proposal seeks to vary the building height limits for increased development yield grounds which is not justified. Clause 4.6 therefore has not satisfactorily addressed the objectives of Clause 4.3 of the TLEP 2014, particularly items:</u> <u>(b) to ensure that building height relates to the land's capability to provide and maintain an appropriate urban character and level of amenity.</u> <u>(e) to enable a transition in building heights between urban areas comprised of different characteristics.</u> <u>(f) to limit the impact of the height of a building on the existing natural and built environment.</u> <u>(g) to prevent gross overshadowing impacts on the natural and built environment.</u> Level 3 (shown adjacent) is the fifth level above natural (refer cross section reviews against natural ground level, which is also inaccurate in some notable locations). This upper level includes large 2 and 3 bedroom units with very large balconies overlooking existing established dwellings, including private spaces, living areas and bedrooms. This level and its dwellings are not warranted and provide only a high end large residential units for financial gain, not a retirement facility. This aspect of the proposal will result in clear demonstrated amenity, privacy, solar impacts to the surrounding neighbours.	 Architectural Drawings PLA-DRW-DA-0108 OVERALL SITE SITE MASTER PLAN - LEVEL 03 Beach Street, Kingscliff Street, Drift Court, Lorien Way
Architectural plan PLDA-200	37. Incorrect Cross Sections and Ground Level Representations <u>The existing ground levels shown on this plan are inaccurate.</u> Refer Survey Plans which indicate existing is 2.9m at interface with norther dwellings fronting Beach Street. The proposal will result in a vertical wall at the basement ramp and along the northern extent to any proposed deep planting. As per flooding that occurred in April 2022 flooding, water will displace directly from the from the subject site into neighbouring properties as a result of this design. Review also Flood Report comments.	 RTI SITE ELEVATION - NORTH Proposed northern interface to Beach Street properties will be a vertical block wall. This is not explained, is not accurate to existing survey and impacts are under represented.

SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	39. Incorrect Levels on Plans <u>Site elevation S1 and 12 are incorrect to existing ground levels.</u> S1 – 25 Drift Court is at 3.6m, with existing site at 1.5m behind. S2 – Church is at 3.15m and 8 Drift Court is up at 3.8m. The plan show this is level ground which it clearly is not on the survey plan	 ARCHITECTURAL DRAWINGS PLA-DRW-DA-0202 OVERALL SITE SITE ELEVATION - SOUTH SITE ELEVATION - SOUTH 1 SITE ELEVATION - SOUTH 2 UNITING plus RE: 17750 BUILDING B NO 25 DRIFT CT ET

SSD Report Source	Issue / Comment	Item / Reference
		
Architectural Plans - Prepared by Plus	40. Incorrect Levels on Plans Interface with neighbouring properties is inaccurate on Beach Street and Blue Jay Cct (as per previous points,). Refer Survey Plans and Architectural Plans Nominated heights on the plans are taken from “freeboard level” not the existing ground level which is far lower than indicated on the plan set.	ARCHITECTURAL DRAWINGS PLA-DRW-DA-0203 OVERALL SITE SITE ELEVATION - WEST 

SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	41. Incorrect Cross Sections Cross sections are incorrect with respect to existing levels over the site. Interface with Drift Court is not currently at 3.8m as represented on the plans. These interfaces includes a vertical wall varying from 1.6 to 1.2m in height. These are not shown in the plan set. Basement level will not be under existing ground level and will be ‘sticking up’, constituting a floor when compared to the existing ground level. Cross Section does not show 1.0m drain reserve along interface of 41 Drift and how the proposed development plans to respond to this aspect.	 ARCHITECTURAL DRAWINGS PLA-DRW-DA-0301 OVERALL SITE SITE SECTION BB & CC UNITING plus ARCHITECTURE 100% DEVELOPMENT APPLICATION (PLA) ARCHITECTURE JANUARY 2024
Visual Impact Report – Prepared by Ethos Urban	42. Misleading and incorrect Visual Representations <u>The visual impact assessment is very misleading and does not accurately depict the true context of the proposed development’s impact on the surrounding area.</u> This includes taking photo points from behind buildings, retaining existing trees that will be removed as part of the development and ‘close-up’ photos from surrounding roads (Beach Street, Drift Crt, Kingscliff St) which purposefully depict existing dwellings as ‘dominant’ buildings in the foreground, minimising the perceived impacts of the proposed buildings. Overall, the Visual Impact Assessment is (either intentionally or unintentionally) misleading and requires significant updates once the final design is revised (based on other non-conformances highlighted in other reports).	Reference photo locations and inclusions below

SSD Report Source	Issue / Comment	Item / Reference
Visual Impact Report – Prepared by Ethos Urban	43. Trees to be removed at maintained in Visual Impact Assessment Established trees along the sites driveway access handle are retained in visual impact assessments. If these trees are to remain following feedback from Council, then the proposed development's access proposal will need to be revised.	 <i>Figure 3 The existing driveway from Kingscliff Street</i> Source: Ethos Urban
Visual Impact Report – Prepared by Ethos Urban	44. Conflicting base and with development image location to minimise impacts. Base photos from Drift Court are taken from back (eastern side) of the cul-de-sac. The visual impact renderings are then taken closer with tree hiding proposed building. In addition, the viewpoint leaves out the single storey dwelling and impacts to greater visual area. Specifically, the viewpoint misses other proposed buildings to south and north which will impact over 180 degrees form this location. Based on other documents within the proposal, the western extent of Drift Court will be imposed with a 4 storey wall from 3 to 4 buildings on close proximity and no visual separation from an angled view. Given the proposed height, all buildings will sit well above the existing 2 storey dwellings on Drift Court and present as a continuous wall visible above all existing dwellings. This is not represented in the renderings provided by the applicant. If shown, it would be clear that the proposal will result in an adverse outcome for surrounding residents.	 <i>Figure 7 Single dwellings in recent subdivision to east</i> Source: Ethos Urban 6.4 VIEWPOINT POSITION 02 - Drift Court PHOTOGRAPHY COURTESY NATH TRULL 

SSD Report Source	Issue / Comment	Item / Reference
		PLAN ILLUSTRATING CAMERA LOCATION  View of buildings will expand along this whole section (180 degrees) not 45 degrees as shown. The result will be vastly different to the visual impact renderings provided  LEGEND - CHURCH - BUILDING A - BUILDING B - BUILDING C - BUILDING D - BUILDING E - BUILDING F - RACE - BASMENT Figure 25 Site plan of the proposed development Source: Plus Architecture The architect has therefore demonstrated a commitment to reducing visual impact across multiple design iterations, to a reasonable and appropriate extent.

SSD Report Source	Issue / Comment	Item / Reference						
Visual Impact Report – Prepared by Ethos Urban	45. Viewpoint 5 taken from behind existing building. <u>The location of Viewpoint 5 points to intentionally misleading assessment. This should be taken from the north east corner of Kingscliff Street/ Beach Street...not Kingscliff Lane (behind an existing building).</u> It is recommended that Viewpoint 5 be relocated to the eastern side of Kingscliff Street / Beach Street intersection.	9.1 VIEWPOINT POSITION 05 - Beach Street/Kingscliff Lane PHOTOGRAPH SHOWING CURRENT CONDITION  NAVY POINTS USED FOR 3D CAMERA ALIGNMENT  PHOTOGRAPH DETAILS <table><tr><td>Photo Date</td><td>8 August 2023</td></tr><tr><td>Camera Used</td><td>Canon EOS R5</td></tr><tr><td>Camera Lens</td><td>28mm</td></tr></table> PROPOSED DEVELOPMENT WITH TREES  PROPOSED DEVELOPMENT WITHOUT TREES  PLAN ILLUSTRATING CAMERA LOCATION 	Photo Date	8 August 2023	Camera Used	Canon EOS R5	Camera Lens	28mm
Photo Date	8 August 2023							
Camera Used	Canon EOS R5							
Camera Lens	28mm							
Visual Impact Report – Prepared by Ethos Urban	46. Established Trees Retained in Visual Impact The established trees along the driveway in this image (except 1 acacia which is strategically placed in front of the new building), will be lost due to the required road widening of the driveway as part of the proposal to provide 2-way traffic and pathway. <u>Confirmation with Council is required if these trees can be removed as part of development. If not, the access handle needs to be revised in the design. If trees can be removed, then visual impact needs to be revised.</u>	10.1 VIEWPOINT POSITION 06 - Kingscliff Street PHOTOGRAPH SHOWING CURRENT CONDITION  NAVY POINTS USED FOR 3D CAMERA ALIGNMENT  PHOTOGRAPH DETAILS <table><tr><td>Photo Date</td><td>8 August 2023</td></tr><tr><td>Camera Used</td><td>Canon EOS R5</td></tr><tr><td>Camera Lens</td><td>28mm</td></tr></table> PROPOSED DEVELOPMENT WITH TREES  PROPOSED DEVELOPMENT WITHOUT TREES  PLAN ILLUSTRATING CAMERA LOCATION 	Photo Date	8 August 2023	Camera Used	Canon EOS R5	Camera Lens	28mm
Photo Date	8 August 2023							
Camera Used	Canon EOS R5							
Camera Lens	28mm							
Visual Impact Report – Prepared by Ethos Urban	47. Lack of viewpoint from Drift Court (No.s 25 to 35). Properties 25 to 35 Drift Court are expected to have a significant impact to privacy, visual, amenity and shadows as a result of the development. These properties are not adequately addressed as part of the visual impact assessment. It is recommended further detailed visual impact renderings are undertaken to address these concerns. Updated location are shown adjacent.							

SSD Report
Source

Issue / Comment

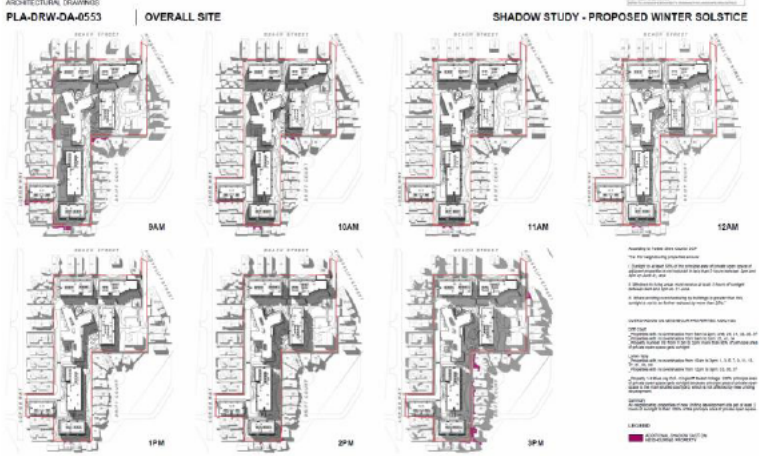
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13.2 APPENDIX A: 3D MODELS SUPPLIED BY PLUS ARCHITECTURE

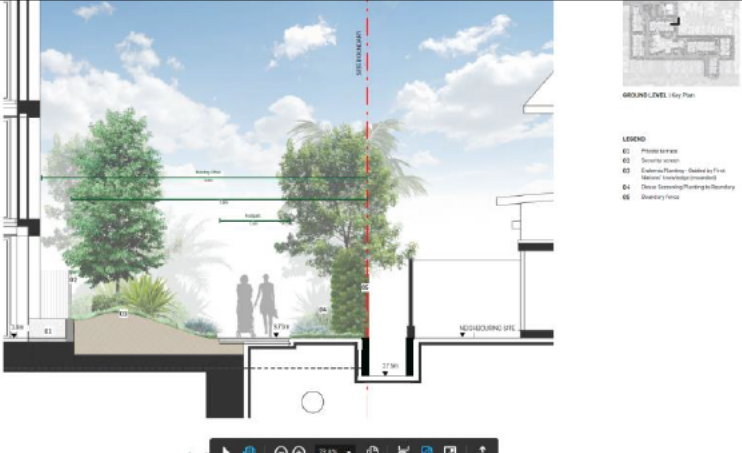


PLAN ILLUSTRATING CAMERA LOCATIONS



SSD Report Source	Issue / Comment	Item / Reference
Architectural Plans - Prepared by Plus	48. Shadow Diagrams The shadow diagrams presented to do accurately reflect the true impacts of the development on neighbouring properties, living space, bedrooms, etc. Specially: • The proposal includes substantial trees on the boundary to block out the development in the landscaping plan and these impacts are not shown on the plan • The plans are very coarse and high level and do not pick up each dwellings habitable room impacts, solar impacts, etc. It is noted that many of the adjacent dwellings on the eastern side (Drift Court) have active living space (internal and external) which face the site and the impacts are no truly represented in the assessment <u>It is clear form the material provided as well as missing information that the shadow impacts as a result of the development's built form, building positioning and height will have an adverse impact on the surrounding residents. This impact is not justified by any aspects of the EIS submission.</u>	 ARCHITECTURAL DRAWINGS PLA-DRAW-0A-0553 OVERALL SITE SHADOW STUDY - PROPOSED WINTER SOLSTICE 8AM 10AM 11AM 12AM 1PM 2PM 3PM 4PM LEGEND SHADOW STUDY - PROPOSED WINTER SOLSTICE
Consultation Outcomes Report - Prepared by Ethos Urban	49. Consultation Outcomes Report The Consultation Outcomes report outlines a series of consultation activities that were undertaken prior to the submission. From a personal perspective, the issue raised in my submission on the 19/4/2023 were either omitted or not adequately addressed by the SSDA submission. This includes concerns regarding: • Traffic parking and access • Building height and set-backs • Bulk and density • Acoustic and amenity impacts • Flooding and neighbour interface impacts It is clear form the consultation outcomes report that the proponent has undertaken a number of “light touches” which have not materially changed the economic viability of the development without focusing on significant constructability, approval compliance and community impacts to the surrounding neighbours.	Andrew Eke residents response to proposal (09/04/2023) – attached.

SSD Report Source	Issue / Comment	Item / Reference
Statement of Landscape Design Intent – prepared by Urbis	50. Statement of Landscape Design Intent The Statement of Landscape Design Intent Report provides elements that are contradicted in other reports includes the TIA, Architectural Plans, Visual Amenity Report and Flooding Report to name a few. This includes: • Established planting where no deep planting areas are proposed along boundaries • Inconsistent tree types and locations to the visual renderings including blocking view corridors • Removal of trees along the driveway access to Kingscliff Street • Including a deep soil and grassed parking aisle for locations at the Church which would not be compliant to AS2890 • Including podium (mound planting) for established tree locations on top of basement and around buildings Additional concerns with the proposal include: • Proposing large palm trees along the boundary which will drop fronds and seeds into neighbouring properties • Using the parking area of the church to justify deep soil and pervious areas for drainage • Positioning “Outdoor Rooms” hard up against existing established dwelling. Of not is the location against Beach Street, Drift Court and Lorien Way properties. The proposed levels and interface with these neighbours is misinterpreted in other documents. • Removal of the exiting established trees along the Kingscliff Street access handle. These trees will provide much needed screening of the development. • The landscape outcome focuses on screening the neighbours through dense planting on the boundary in an effort to reduce visual and privacy impacts of the built form. Unfortunately, this will result in removal of sunlight or view corridors currently afforded to these existing properties. This treatment therefore adversely impacts the adjacent residents and reiterates the need for the built form to be reduced • The cross sections show established trees on the boundary outside the deep planting zone. • The section reiterate the issues associated with the raising of the land and calculations of building heights.	

SSD Report Source	Issue / Comment	Item / Reference
	51. Landscape Cross Section behind Building F The boundary fence and interface to Drift Court Properties represents a series of issues including: - Established trees on the boundary and not interface or coordination with the draining area provided as part of the Drift Court sub-division in 2017. The result is a 1.0m concrete drain running between the two properties - Established trees are shown to be growing outside deep planting areas - The section shows a grass mound to accommodate large trees and has the potential for persons to stand elevated in the site and view over the fences towards existing bedrooms and living areas.	
Access Report – Prepared by Purple Apple Access	52. SEPP Clause 93 and 104 The access report refers only to access to bus stops on Lorien Way and fails to review and identify the existing deficiencies from Kingscliff Street to key distinctions. This includes deficiencies' crossing Kingscliff Street to access the foreshore pathway, which is the major connection to shopping, service and entertainment facilities close to the site. Key issues includes at Kingscliff St / Beach St intersection, Kingscliff St / Pearl Street intersection and Beach Street / Marine Parade. Considering the nature of the development and potential for a high proportion of elderly and vulnerable users with disability, it is disappointing that the proposed development and specialist reports do not recognise these existing deficiencies surrounding the site or identify mitigation measures as part of this development.	4.1 SEPP Clause 93 Location & Access to Facilities A SEPP development must offer access to services such as shops, banks, retail services, commercial services, recreational facilities, community facilities and doctors. These facilities are to be located within 400m of the site via a pathway that provides a suitable access pathway. The SEPP states that a <u>suitable access pathway</u> is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorized cart or the like. Further, the SEPP defines <u>wheelchair access</u> as follows (clause 3: interpretation) <i>wheelchair access, in relation to any 2 points, means a continuous path of travel between those points that can be negotiated by a person using a wheelchair.</i> The overall aims of the SEPP are to: — increase the supply and diversity of residences that meet the needs of seniors or people with a disability, and — make efficient use of existing infrastructure and services, and — be of good design.

SSD Report Source	Issue / Comment	Item / Reference
View Loss Assessment – prepared by Ethos Urban	53. The View Loss Assessment Inadequate Perspectives The View Loss Assessment does not meet the SEARS assessment requirements due to the following: - Only 2 affected properties on Drift Court were reviewed, where as there will be a minimum of at least 40 properties located immediately adjacent to the site that will be affected. - The assessments embellish the extent of deep planting on the site and immediately adjacent to the property boundaries and hard up against fences. If it is valid, these impacts need to be represented in the shadow assessments. - The view points are via an acute angle and no representative of the wider field of vision or picking up the cumulative impacts of multiple buildings in a row or surrounding properties on various angles. - The resultant view points are underestimated in their assessment and demonstrate a stark contrast to the existing views and emphasize the flow on impacts beyond just view that the proposed development's built forms will have on neighbouring residents. It is recommended that following any refinement of the proposed development's yield, layout, landscaping, levels and design, additional view loss assessments should be provided to better replicate the true forecast example of the facility and how is can address any impacts to existing views.	7.5 VIEWPOINT POSITION 03 - 37 Drift Court PROPOSED DEVELOPMENT WITHOUT TREES 
Flood Report – Prepared by Venant Solutions	54. Flood Model not locally validated The existing flood model is not considered to be locally validated to existing peak flood conditions. Specifically, reference is made to the recent flood event in March 2022 which resulted in flood waters on Drift Court (refer images). The localised issues are a result of inadequate stroawater facilities to service the immediate area and therefore the location incorporates a reliance on the existing basin on the subject site to accodoate flood events.	

SSD Report Source	Issue / Comment	Item / Reference
		
	55. Worsening impacts to Church on Site and Boundary to Drift Court Residents The modelling demonstrates that the filling of the site and associated civil works shift flooding impacts to the eastern corner of the site around the existing Church. On 1st March 2022, this particular location exhibited water flowing out of stormwater drainage behind the church and pooling in this location. The adjacent properties on Drift Court have been provided with a 1.0m V Drain. No mention of how this interface is treated as part of the proposed basement and filling of the site. Significant concerns are raised regarding the proposed development's impacts on surrounding properties as a result of these works and the flood modelling to date is too coarse and does not adequately address the impacts of the proposed development and it's filling of the site. As outlined in historical photos from 1st March 2022, all stormwater pipers surrounding the site were fully charged and not able to accommodate the rising water levels. This resulted in significant flooding within the subject site and this expanded to impact the adjacent streets of Drift Court, Lorien Way and Beach Street.	

SSD Report Source	Issue / Comment	Item / Reference
	The local flood storage for the surrounding community has been demonstrated by this previous event that to heavily rely on this considerable flood storage offered by the basin located at the southern end of the site. Should the proposed development significantly vary and reduce the quantum of flood storage on the site as proposed, it is expected that in the event of another adverse flood at or near 1% AEP class action legal representations would be made against the proponent for adverse impacts to adjacent residents.	
EIS Report – Prepared by Planit Consulting	56. Impacts to Privacy The Environmental Impact Statement (EIS) lacks proper analysis of overlooking. It relies only on setbacks and occasional planter boxes on balconies to prevent views into neighbouring properties. This is inadequate, especially considering the claim that the development ensures appropriate privacy to justify its height. The design does not address privacy appropriately given the significant number of low-density residential properties at almost all property boundaries on this site.	
EIS Report – Prepared by Planit Consulting	57. Justification of Proposed Building Density and Built Form The EIS seems to focus selectively on the planning controls that suggest a four-storey building would be suitable for this location, while overlooking the provision that indicates a built form of fewer than 4 storeys would be more appropriate. In particular, I refer to the the evaluation of the proposal against the Seniors Housing Design Guide 2023. According to SEPP (Housing) 2021 at Clause 97, the design of seniors housing must adhere to specific guidelines. The EIS does not seem to provide a comprehensive assessment of the Seniors Housing Design Guide 2023. For instance, on page 91 of the EIS, only a single line commentary is given regarding compliance with the Seniors Housing Design Guide 2023. Elsewhere in the document, it is mentioned that the assessment of the Seniors Housing Design Guide 2023 is included in the Architectural Design Report in Appendix C of the EIS. However, a review of the Architectural	

SSD Report Source	Issue / Comment	Item / Reference
	Design Report shows that it only considers Part 2 - Guidance Chapter and does not include Part 3 Density and Related Design Principles. Part 3 of the Seniors Housing Design Guide 2023 addresses how to determine an appropriate development density and building heights. However, these provisions have not been assessed or discussed in the documentation. This could be an oversight or a deliberate omission, as Part 3 of the Seniors Housing Design Guide 2023 seems to suggest that a medium density outcome (3 storeys or less) would be more suitable for this location, as opposed to a high-density outcome (more than 3 storeys). The justification for the built form outcome mainly relies on the need to provide senior housing. However, in my opinion, this alone is not sufficient justification to overlook the need for appropriate building height limits, avoiding overshadowing of neighbouring properties, and ensuring compliant solar access to adjoining properties.	