

## Appendix C

### Detailed Response to Submissions

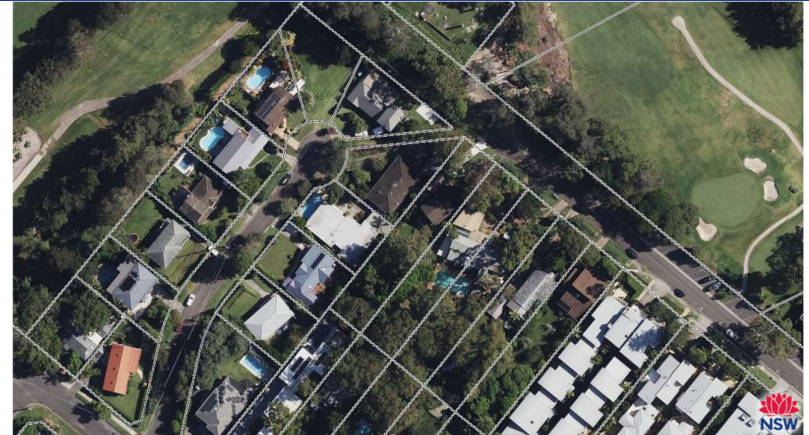
This section provides a detailed summary of the Applicant's response to the matters raised in submissions received.

#### 1.1 Department of Planning, Housing and Infrastructure

The Applicant's response to the Department of Planning, Housing and Infrastructure submission is outlined in **Table 1** below.

**Table 1** Department of Planning, Housing and Infrastructure Submission

Item	Matters Raised	Responses
Distance from bus stop		
DPHI-1	<p>Confirm that the pedestrian pathway at the end of Kunari Place (used in measuring the walking distance to the Maxwell Street bus stop) is a publicly accessible land. The following documents should be submitted in this regard:</p> <ol style="list-style-type: none"><li>ownership records (such as title or Council records) verifying its status as publicly accessible land</li><li>clarification that no gates, curfews, or other time-based controls limit pedestrian movement along this route during bus operating hours.</li></ol>	<p>The pedestrian pathway located at the end of Kunari Place is confirmed to be publicly accessible land. This has been verified through mapping generated from SixMaps, which identifies the pathway within public land boundaries.</p> <p>Further confirmation has been provided by LTS, who supplied a copy of Deposited Plan DP22668 at <b>Appendix N</b>. This is the original plan that dedicated both Kunari Place and the associated pedestrian pathway to the public. LTS have also provided a Cadastral Record Enquiry, which depicts the pathway in grey shading, the standard cadastral convention for public roads and publicly accessible pathways.</p> <p>In addition, following an on-site inspection, LTS can confirm that there are no gates, fences, or physical obstructions restricting public access along the pathway.</p> <p>Accordingly, the pedestrian link is a dedicated and unobstructed public accessway.</p>



#### Affordable housing

DPHI-2 *Clause 15(C)(2) of the indicates that the infill affordable housing component provided under clause 15 of the Housing SEPP does not count towards the affordable housing required by another environmental planning instrument or a planning agreement.*

*Confirm that the proposal will include affordable housing (gross floor area and monetary contributions) satisfying the requirements of clause 7.14 of Pittwater Local Environmental Plan (PLEP) 2014, in addition to the affordable housing provided under Chapter 2 of the Housing SEPP.*

Confirming the proposal will include an affordable housing contribution satisfying the requirements of Clause 7.14 of Pittwater Local Environmental Plan (PLEP) 2014, in addition to the affordable housing component provided under Chapter 2 of the Housing SEPP.

The proposed development includes an affordable housing component, provided in accordance with Chapter 2, Clause 15C of the Housing SEPP.

Under Clause 7.14 of the LEP, this requirement may be met through either the dedication of residential GFA or the payment of a monetary contribution. For this proposal, the obligation will be satisfied through a monetary contribution, which is consistent with the mechanisms permitted under the LEP.

Refer to **Section 4.5.3** and **Section 4.5.4** of the EIS.

DPHI-3 *Provide details to clarify how the affordable housing GFA (under Housing SEPP and PLEP 2014) is allocated between buildings and dwelling types.*

All affordable housing GFA is located within Building C, as illustrated in the submitted Architectural Drawings (Drawing DA510). A total of 10 affordable dwellings are provided, comprising five (5) 2-bedroom and five (5) 3-bedroom apartments. No affordable housing is distributed across the other buildings within the development.

The allocation by level and dwelling type within Building C is as follows:

- Ground Floor: 1 apartment – 1 x 2-bedroom
- Level 1: 4 apartments – 2 x 2-bedroom, 2 x 3-bedroom
- Level 2: 4 apartments – 2 x 2-bedroom, 2 x 3-bedroom
- Level 3: 1 apartment – 1 x 3-bedroom

#### Sydney Water infrastructure

- DPHI-4 *An existing sewer line traverses the rear portion of the site. In this regard, provide:*
- a) details of all engagement and written confirmation from Sydney Water supporting the proposed encroachment of the building over the sewer line and the basement setback of 2.3m*
  - b) sections showing how the proposed building would be built for the sewer line with any encasing.*

Sydney Water issued a Notice of Anticipated Requirements (NOR) for a Section 73 Certificate to the Applicant on 11 February 2025, this has been provided at **Appendix M**, which outlines Sydney Water requirements for the project. Regarding the encroachment of the building over the sewer line and the basement setback of 2.3m, the NOR specifically refers to the following requirements:

- Approval of Building Plans (following DA approval) required.
- A Services Protection Report may be required, subject to confirming from Water Servicing Coordinator.
- Your WSC has advised that the required replacement and concrete encasement of the existing 150 mm PVC sewer main is to be constructed under the BPA in-scope approval process (less than 25m).

Updated Architectural Drawings (Drawing DA300) have been prepared by PBD Architects (**Appendix D**). These include a building section, identified as Section A, to demonstrate how the proposed structure will be constructed in relation to the existing sewer infrastructure. Section A also identifies a 3m clearance above the manhole, clearly illustrating the spatial relationship between the proposed building and the sewer.

#### Flood Mitigation

- DPHI-5 *The site is affected by mainstream flooding. The flood report recommends that Building C should be suspended to allow free flow of flood waters. The proposal includes screens within the elevated portion of Building C.*
- Provide confirmation from a qualified flooding engineer that the screens would not obstruct the free flow of flood waters would occur, including any recommendations in relation to the design and/or maintenance to ensure that the area under the building is retained as flood storage/passage.*

Technical input from the Applicant's existing qualified flooding engineer, Martens, has been prepared to address the screens included within the elevated portion of Building C (refer to **Attachment L**). The letter confirms that the louvre screens have been replaced with open style fencing and would not inhibit the function of the flood path.

The proposed open-style louvre fencing beneath the building is proposed only to restrict access to the high-hazard area and is designed to remain flood-compatible rather than form a solid enclosure.

A conservative 50% blockage factor has been adopted in the hydraulic modelling to account for potential obstruction and debris accumulation. On this basis, the modelling demonstrates that the design would not result in any adverse flood impact outside the site and the undercroft area would continue to function as flood storage and flood passage.

Updated mitigation measures are provided at **Appendix B**.

#### Apartment Design Guide (ADG)

DPHI-6

##### **Communal open space (COS)**

*The Apartment Design Guide (ADG) recommends that 25% of the site area should be dedicated as COS, which are useable and provide equitable access to all occupants. The Department raises concerns regarding the location of the COS within the rear portion of the site, which accommodates significant biodiversity and is also flood affected. A large portion of this COS may be unusable and/or have adverse impacts on the biodiversity values and the understorey vegetation.*

*In this regard, you must:*

- a) *identify alternate areas within the site apart from the mapped biodiversity area, that can be suitably used as COS (this may include introducing rooftop COS areas)*

An additional communal open space area has been introduced, located between Buildings A and B. Further to this, part of the existing communal open space has been changed to lawn area, to increase the provision of principal communal open space.

As a result of this design development, the total communal open space provided on the site has increased to 1,866m<sup>2</sup> (30%) and the total principal communal open space has increased to 961m<sup>2</sup>, this is shown in the Updated Architectural Drawings (Drawings DA551) prepared PBD Architects (**Appendix D**).

- b) *delineate the principal COS area and demonstrate that 50% of this area will receive 2 hours of direct sunlight between 9 am – 3 pm, mid-winter, meeting the ADG recommendation (use true north in preparing the shadow diagrams)*

The Updated Architectural Drawings (Drawings DA551 and DA552) prepared PBD Architects (**Appendix D**) delineate the principal communal open space extent, its context within the proposed development, and its relationship with the remaining communal open space.

The revised principal communal open space footprint equates to 961m<sup>2</sup>, and an assessment of its solar access is provided in the Updated Architectural Drawings, illustrating that 59% of principal communal open space will receive 2 hours of direct sunlight between 9am and 3pm mid winter. This is a result of the additional communal open space provided between Buildings A and B.

	<p>c) <i>clarify how equitable access to the COS is achieved by all occupants, given Building A does not appear to have direct access to the rear COS due to level changes, retaining walls, and the private open space of Unit AG06.</i></p>	<p>The Updated Architectural Drawings (Drawings DA101 and DA102) prepared by PBD Architects (<b>Appendix D</b>) introduce a platform lift at the rear of Building C, providing accessible access to the communal open space at the rear of the development.</p> <p>Direct access to the additional communal open space is available for Building A residents, via the southern lift on Basement 1.</p>
DPHI-7	<p><i>The EIS and design report identify 1,554 m<sup>2</sup> as COS, while the architectural plans indicate 1,724 m<sup>2</sup>. Ensure that COS is identified correctly and consistently across documents and that all private open space areas for ground-level apartments are excluded from COS calculations.</i></p>	<p>As a result of design development, the total communal open space provided on the site has increased to 1,866m<sup>2</sup>, this is shown in the Updated Architectural Drawings (Drawings DA551) prepared PBD Architects (<b>Appendix D</b>).</p> <p>The EIS and Design Report have been updated to reflect this. Refer to <b>Appendix E</b>.</p>
DPHI-8	<p><b>Visual privacy</b></p> <p><i>The Department notes that some of the habitable room windows within the development are located directly opposite the habitable windows of the immediately adjoining building. These buildings do not currently meet the minimum building separation recommendations of ADG for habitable rooms. These windows must be relocated so that they do not face each other, or else additional privacy measures (such as louvres, screens or angled windows) proposed.</i></p>	<p>The Updated Architectural Drawings prepared by PBD Architects (<b>Appendix D</b>) ensure that the visual privacy of habitable room windows is improved. Relevant windows have been relocated or removed to address visual privacy matters while others have been treated with privacy measures such as screening.</p>
DPHI-9	<p><b>Deep soil zone</b></p> <p><i>Recalculate the deep soil provisions (section 3E of the ADG) to be consistent with the ADG definition, excluding (as a minimum):</i></p> <p>a) <i>built and hard paved areas</i></p> <p>b) <i>landscaped areas less than 6 m in width.</i></p>	<p>The Updated Architectural Drawings prepared by PBD Architects (<b>Appendix D</b>) include recalculated deep soil areas consistent with the definition provided within the ADG. Amended calculations remain compliant with the provisions of the ADG and are as follows:</p> <ul style="list-style-type: none"><li>• Deep soil requirement – 7% (428.5m<sup>2</sup>)</li><li>• Deep soil proposed (recalculated) – 26% (1,614m<sup>2</sup>)</li><li>• Landscaped area requirement – 30% (1,836.6m<sup>2</sup>)</li><li>• Landscaped area proposed (recalculated) – 50% (3,064m<sup>2</sup>)</li></ul>
DPHI-10	<p><b>Solar access</b></p> <p><i>Several ground-floor apartments and their associated private open-space areas may not achieve two hours of direct sunlight between 9 am and 3 pm in mid-winter, in accordance with the ADG recommendations. You are therefore requested to:</i></p> <p>a) <i>revisit the sun eye diagrams and clarify the level of solar access to these apartments</i></p>	<p>The Updated Architectural Drawings (Drawing DA603) prepared by PBD Architects (<b>Appendix D</b>) provide updated solar compliance details to delineate the solar access compliance of living spaces and private open spaces.</p> <p>59 out of 82 (72%) apartments receive a minimum of two hours of direct solar access to their living spaces between 9am and 3pm mid-winter. Of these, nine are ground floor apartments representing 66% of all 14 ground floor apartments achieving compliance.</p>

b) *explore design amendments to these apartments to improve their solar access, given that less than 70% apartments within the site, currently meet the ADG solar access criteria.*

58 out of 82 (71%) apartments receive a minimum of two hours of direct solar access to their private open space between 9am and 3pm mid-winter. Of these, nine are ground floor apartments representing 66% of all 14 ground floor apartments achieving compliance.

For further information refer to **Section 3.2.1** of the Response to Submissions Report.

DPHI-11

**Apartment layout**

*Insufficient information has been provided to assess the proposed development against the ADG recommendations for apartment layouts.*

*Provide updated architectural plans with additional measurements/labelling for plans of individual apartments (typical layouts) with dimensions of depth (for single aspect apartments), windows, etc to demonstrate how the development meets the recommended criteria.*

The Updated Architectural Drawings (Drawing DA561) prepared by PBD Architects (**Appendix D**) now provide detailed measurements for the typical apartment layouts across the development, including apartment areas, private open space areas, and the width and depth of individual rooms.

Additionally, further information of individual apartment compliance with ADG numerical controls is provided within the Updated Architectural Drawings (Drawing DA002).

DPHI-12

*Provide an updated ADG summary table clearly demonstrating overall consistency of the individual apartments with the relevant Part 4 ADG performance criteria (with figures and justification for any departures as necessary).*

The Updated Design Report prepared by PBD Architects (**Appendix E**) provides further justification within the ADG Compliance Table.

Additionally, further justification of individual apartment compliance is provided within the Updated Architectural Drawings (Drawing DA002) prepared by PBD Architects (**Appendix D**).

**Car parking**

DPHI-13

*The proposal includes 164 residential car spaces, including 8 accessible spaces, which is 59 spaces more than the minimum non-discretionary car parking rates in the Housing SEPP.*

*The Department recommends you reduce the number of residential car parking spaces in line with the minimum requirements in the Housing SEPP (98 for market and 7 for affordable apartments).*

*Please note that The Pittwater Development Control Plan Parking rates should not be applied to the market apartments.*

The proposed number of parking spaces for the development represents a locally responsive approach to parking demand. Given the location and existing character of the area, including higher rates of car ownership and lower rates of public transport vehicle mode share, the inclusion of 164 residential car spaces is considered appropriate and responsive to the likely future tenants within the development.

The development adopts the Pittwater DCP rates, which have been adopted by Council to ensure sufficient parking is provided that meets anticipated user demand within the Northern Beaches LGA. The applicability of these rates has been confirmed within the Northern Beaches Council's submission, dated 29 January 2026 and publicly accessible via the Major Project Portal, which explicitly notes that "the total 164 parking spaces is acceptable".

		<p>Importantly, the non-discretionary car parking rate within the Housing SEPP is a minimum requirement, of which the proposal achieves. The Applicant has reviewed the parking provision for at market and affordable housing provisions and has resolved to retain the already proposed parking rates.</p> <p>Further, 62 unique public submissions requested increased parking spaces, citing the impacts of overflow parking into the street as critical and likely consequences for an undersupply of parking. Therefore, reducing parking any further would result in a lower quality design outcome and traffic outcomes for surrounding residents and visitors.</p>
DPHI-14	<i>Provide a detailed breakdown of the proposed car parking spaces, showing the distribution of car spaces among the market and affordable apartments.</i>	<p>The Updated Architectural Drawings (Drawing DA002) prepared by PBD Architects (<b>Appendix D</b>) include a detailed breakdown of the proposed parking spaces allocated to each apartment, an assessment of compliance with the relevant parking rates, and identification of the location of the allocated parking for each dwelling.</p>
DPHI-15	<i>Confirm the provision of EV charging infrastructure consistent with NCC.</i>	<p>EV charging infrastructure will comply with the relevant provisions of the NCC. This will be confirmed via a condition of consent, pending approval.</p>
DPHI-16	<i>Provide additional information, including swept-path analysis to demonstrate how a car can turn around at the end of each car parking isle without relying on the car parking spaces.</i>	<p>Noted. Technical input from the Applicant's existing civil and structural engineers, CTP, has been prepared to address the vehicular movement matters (refer to <b>Appendix H</b>).</p> <p>Given the proposed development does not make provision for any off-street visitor parking, all car parking spaces will be allocated to respective apartments (i.e. there will not be any visitors (or residents) driving into the car park looking for a vacant space. As such, there is no necessity to provide turning bays at the ends of each parking aisle, and in turn, nor any swept turn paths to demonstrate the manoeuvre).</p>
<b>Building height</b>		
DPHI-17	<i>The uppermost portions of the lift overruns (Buildings A and C) appear to exceed the allowable height in several areas. Please submit additional sections to confirm the building heights at multiple points and demonstrate compliance with the maximum permissible building height for the site. The documentation must include:</i> <ul style="list-style-type: none"><li><i>a) updated sections, elevations and diagrams clearly showing the extent of height, particularly at critical measurement points</i></li><li><i>b) reduced Level (RLs) along the existing ground planes and the corresponding uppermost points of each building (top of the lift overrun, building parapets, etc) to clearly</i></li></ul>	<p>The Updated Architectural Drawings (Drawings DA200, DA201, DA202, DA203, DA300 and DA301) prepared by PBD Architects (<b>Appendix D</b>) display the RLs along the existing ground planes in elevations and sections and the uppermost points of each building, including where the lifts are located.</p>

*demarcate the building heights at various locations and any basement protrusions above ground.*

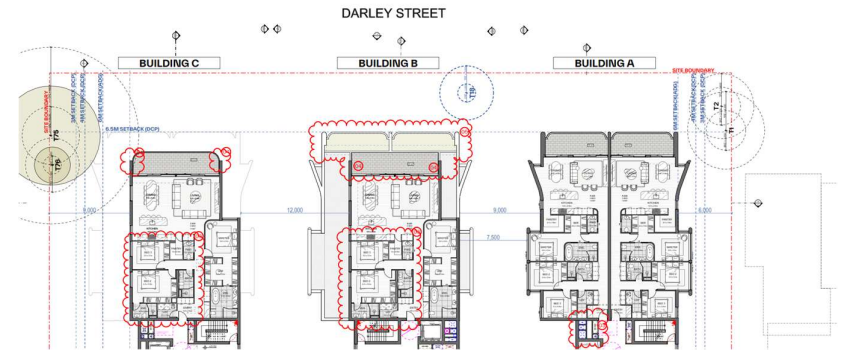
Other matters		
DPHI-18	<i>Clarify how the proposal meets the Tree Canopy Guide for the Low and Mid Rise (LMR) housing guidelines, noting that large, mature trees of good health in deep soil zones are proposed to be removed and replaced with smaller trees.</i>	<p>The Updated Landscape Report prepared by Arcadia (<b>Appendix G</b>) confirms that the proposed tree canopy area is 1,842m<sup>2</sup> which covers 30.1% of the total site area, exceeding the 20% green cover target set for residential flat buildings under the Tree Canopy Guide for the Low and Mid Rise housing guidelines.</p> <p>Tree retention has been considered where feasible, supported by new plantings located around all edges of the property to enhance canopy cover.</p>
DPHI-19	<i>Provide additional landscape plans indicating the planting areas, their soil depth and volumes and the soil volume/depth relationship to proposed species and plant sizes to ensure ongoing viability of proposed landscaping.</i>	<p>The Updated Landscape Plans and Report prepared by Arcadia (<b>Appendix F</b> and <b>Appendix G</b>, respectively) indicate the planting areas, their soil depth and volumes.</p>
DPHI-20	<i>Address Crime Prevention Through Environmental Design (CPTED) principles with details on proposed measures.</i>	<p>The EIS has been updated by Colliers Urban Planning to include an assessment of CPTED principles (refer to <b>Section 6.13</b> of the EIS).</p> <p>Additionally, the architectural design principle of Safety is included within the Updated Design Report prepared by PBD Architects (<b>Appendix E</b>).</p>
DPHI-21	<i>Update the north point on all architectural plans (including shadow diagrams) to reflect the true north point shown on the survey plan.</i>	<p>The Updated Architectural Drawings prepared by PBD Architects (<b>Appendix D</b>) reflect true north as shown on the Survey Plan (Appendix K to the EIS).</p>

## 1.2 Northern Beaches Council

The Applicant's response to the Northern Beaches Council submission is outlined in **Table 2** below.

**Table 2 Northern Beaches Council Submission**

Item	Matters Raised	Responses
<b>Development Assessment</b>		
NBC-1(a)	<p><b><i>The proposal does not provide appropriate Landscaped setting, has excessive bulk, scale and massing, and does not provide suitable setbacks and separation.</i></b></p> <p><i>The provisions of SEPP Housing 2021 allow for a scale of built form significantly greater than the established character in the area. However, concern is raised with the extent of built form, lack of integration with the landscaped setting, and lack of appropriate separation and setbacks to neighbours. Surrounding development responds to a development standard for building height of 8.5m. A building of the proposed scale, in this context, should provide greater separation (to respond to the guidelines under ADG), and provide greater areas of landscaping and planting to mitigate the visual impact of building bulk, particularly within the front setback area. Areas with extensive wall lengths should be provided with greater articulation and stepping.</i></p>	<p>The design incorporates several key strategies to moderate building scale and articulate the built form. These include breaking the Darley Street elevation into three well-separated buildings, introducing vertical bays to reduce perceived mass, adopting stepped building heights that follow the site's natural topography, and providing recessed upper levels and articulated façades to reduce visual impact.</p> <p>The proposal complies with ADG separation requirements, and Council setback controls (where relevant).</p> <p>Total landscaped area of 50% meets Council DCP recommendations and significantly exceeds 30% requirement of the Housing SEPP.</p>
NBC-1(b)	<p><b><i>The proposal provides insufficient response Building Separation (including at the zone interface) and Visual Privacy under Apartment Design Guide (ADG).</i></b></p> <p><i>Concern is raised with the lack of separation of the upper levels from the northern boundary. The ADG requires an additional 3m (total 9m) in separation be provided for the lower density zone interface. Separation of at least 9m should be provided for the upper two levels to minimise privacy and amenity impacts on adjacent development.</i></p>	<p>Amended Architectural Drawings have been prepared by PBD Architects (<b>Appendix D</b>) which provide an additional 3m (total 9m) setback to the upper levels of Building C, addressing the zone interface to the west. Additionally, the setbacks for upper floors have also been increased to 9m from the western boundary. Please refer to Level 5 Plan and Level 6 Plan at <b>Appendix D</b>.</p>



*Level 5 plan as proposed to be amended*

Source: PBD Architects



*Level 6 plan as proposed to be amended*

Source: PBD Architects

It is acknowledged that the rear section of Building C does not achieve a 9-metre setback. However, this non-compliance occurs only in relation to non-habitable rooms. In accordance with the ADG, the 9-metre minimum setback requirement applies to habitable rooms only, and therefore is not activated in this instance. As such, the reduced setback is considered appropriate as it does not result in any unacceptable adverse amenity impacts.

**Section 6.2** of the EIS outlines that the western boundary can no longer be characterised as a zone interface. While the adjoining land is zoned R2 Low Density Residential, the applicable LMR planning controls permit the development of residential flat buildings on that land. As such, the potential built form outcomes on both sides of the boundary are comparable in scale and intensity, and the interface should be assessed as a like-for-like residential context rather than a transition between different zones. As such, the western interface is not considered to warrant the application of increased separation.

NBC-1(c) ***The Siting of Development (Orientation) does not allow for appropriate Solar Access in accordance with ADG.***

*The siting, design and scale of the built form would have significant impacts on solar access for properties to the south. As well as providing greater separation to the north (as above), consideration should be given to siting and orientation the building to provide greater levels of solar access to neighbouring properties.*

Multiple built form scenarios were modelled and tested to identify the most effective approach for minimising overshadowing while achieving a feasible development outcome. This iterative process concluded that locating the tallest components of the development at the lowest point of the site, combined with increased rear setbacks, recessed upper levels and a stepped massing strategy, maximises the ability for the solar plane to project beyond the proposed built form. This approach successfully retains as much solar access as possible for both the Park Street properties to the southwest and the 155-157 Darley Street West properties to the southeast, as illustrated in the Sun Eye view diagrams included in the Updated Architectural Drawings at **Appendix D**. While some overshadowing is unavoidable due to the site's orientation, topography and proximity to neighbouring dwellings, the resultant impacts are considered acceptable. This is due to the strategic placement of height, the use of stepped massing, existing solid fencing that results in self-shadowing of neighbouring townhouse backyards, and the presence of mature trees within the site that already contribute to a shaded environment. Overall, the proposed design represents a balanced and well-considered response that optimises solar access to neighbouring properties to the greatest extent achievable.

NBC-1(d) ***There is inconsistent information provided for Building height and affordable contributions.***

*The proposed contributions are based on a building height of 21.175m. However, the maximum building height on the sections is approximately 22m.*

PBD Architects have amended section plans to detail the maximum height of 21.175m. Please refer to Updated Architectural Drawings at **Appendix D**.



North and South Elevation as proposed to be amended

Source: PBD Architects

**Traffic**

NBC-2(a) **Parking**

The off-street parking requirements would be as per the Pittwater DCP. i.e. 2 spaces per dwelling. The total of 164 parking spaces is acceptable. However, with up to 10% of dwellings needing to be adaptable, the parking space for each dwelling should be designed as an accessible parking space.

No visitor parking is available on site in line with the requirements of the Housing SEPP. A parking study has not been undertaken to demonstrate there is available street parking to offset the lack visitor parking within the development site. There is angle parking on the opposite side of Darley Street West that currently has an 8-hour timed restriction, which may need to be adjusted to provide suitable turnover to support the development. This should be subject to further Council approval and at the developer's cost.

Eight (8) adaptable dwellings are proposed as part of the development. As such, the proposed car parking includes eight accessible parking spaces as shown on the Updated Architectural Drawings project information sheet (**Appendix D**).

CAR PARKING REQUIREMENTS	Housing SEPP Parking Rate (per unit)	Pittwater Council Parking Rate (per unit)	No. of Units / Area	Housing SEPP Min. Required	Pittwater Council Min. Required	Proposed
<b>Residential</b>						
Affordable 2 Bed	0.5	2	6	3	12	12
2 Bed	1	2	20	20	40	40
Affordable 3 Bed	1	2	4	4	8	8
3 Bed	1.5	2	52	78	104	104
			<b>Total residential</b>	<b>105.0</b>	<b>164.0</b>	<b>164</b>
Visitor	Not Required					
Accessible	10% dwellings	10% dwellings	82	8	8	8
			<b>TOTAL</b>	<b>105</b>	<b>164</b>	<b>164</b>
<b>OTHER PARKING REQUIREMENTS</b>						
Bicycle		1 / 3 per dwellings	82		27	27
Motorcycle		1 / 100 Car Bays	176		1.76	2

Architectural Drawings Project Information Sheet Car Parking Requirements

Source: PBD Architects

Visitor parking is not mandated under the Housing SEPP applicable to this application and, accordingly, no off-street visitor parking spaces are proposed. Sufficient on-street parking is available in the vicinity to accommodate visitor demand. On this basis, a parking study is not warranted and is also not a requirement of the SEARs.

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NBC-2(b)	<b>Traffic Generation</b>	<p>CJP Consulting Engineers have prepared a response report as part of this RFI (<b>Appendix H</b>).</p> <p>CJP Consulting Engineers have assessed the proposal for high-density residential dwellings with low public transport accessibility, where it is concluded that the proposed development is expected to generate approximately 33 vph during the weekday morning peak and 26 vph during the weekday afternoon peak.</p> <p>Traffic surveys indicate existing two-way flows on Darley Street West of approximately 50–70 vehicles per hour during weekday peak periods. The proposed development is expected to generate a further 26–33 peak-hour trips, resulting in cumulative flows of approximately 85–90 vph, well below the 200 vph environmental capacity for a local residential street.</p> <p>Assessment of traffic impacts focuses on maintaining the existing level of service, having regard to traffic volumes, delays and manoeuvrability. The operational effects of the additional traffic have been assessed using SIDRA 10, a modelling tool widely adopted by TfNSW and most LGAS. The SIDRA modelling confirms that the intersection is currently operating at Level of Service A &amp; B and will continue to do so under the proposed development scenario.</p> <p>Accordingly, the proposed SSDA is supportable on traffic impact grounds.</p>
NBC-2(c)	<b>Loading/servicing</b>	<p>CJP Consulting Engineers have prepared a response report as part of this RFI (<b>Appendix H</b>).</p> <p>As outlined in the Traffic &amp; Parking Assessment Report (TPAR) submitted with the SSDA, Council will collect general waste, recycling and FOGO on a weekly basis in accordance with Council's collection schedule.</p> <p>Prior to collection, the building manager/caretaker will transfer bins from the communal bin rooms to the level 1 bin holding room using a bin tug, ensure bins are correctly arranged, and confirm the loading area is clear of obstruction.</p> <p>On collection days, Council vehicles will park on Darley Street West adjacent to the site, with Council staff accessing the bin holding room to service and return bins. Council's waste officer confirmed satisfaction with these kerbside collection arrangements at the pre-lodgement meeting between Council and the applicant's project team. The site benefits from a nett frontage of 70 metres, excluding the 6-metre driveway crossover.</p>

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		<p>Following the initial move-in period, removalist activity will be infrequent. Other servicing will be limited to occasional SRVs and light commercial vehicles, which can be accommodated within the available frontage and on-street parking opposite the site.</p> <p>Consistent with surrounding medium- and high-density developments on Darley Street West, all waste collection and servicing will occur on-street.</p> <p>Accordingly, the proposed SSDA is supportable in terms of waste collection and servicing</p>
NBC-2(d)	<p><b>Circulation</b></p> <p><i>The access road should be designed for the largest vehicle that would access the subject site, noting the waste collection vehicle is 10.5m and the development is likely to be serviced by this size vehicle, circulation should be provided to address the HRV design vehicle.</i></p> <p><i>Vehicle circulation throughout the carpark must be demonstrated for a B85 vehicle passing a B99 vehicle. With all critically located parking spaces demonstrated to provide acceptable access for a B85 vehicle.</i></p>	<p>Council's reference to "the access road" is assumed to mean the site access driveway. As outlined in the column above, the site's 70-metre nett frontage is more than sufficient to accommodate servicing demands, particularly given the level of off-street parking provided. This approach is consistent with existing medium- and high-density residential developments along Darley Street West, none of which provide on-site truck loading bays, with waste collection and servicing occurring on-street.</p> <p>Swept path analysis in the TPAR confirms that a B99 vehicle can pass a B85 vehicle at regular intervals within the car park. While opposing paths overlap at some locations, convex mirrors will be provided to improve intervisibility, allowing vehicles to briefly give way where required; an arrangement that is common and acceptable in modern car parks.</p> <p>The development is expected to generate low traffic volumes (approximately 33 vph in the weekday AM peak and 26 vph in the PM peak), with predominantly tidal flows. Accordingly, the likelihood of opposing vehicle conflicts is low, and sufficient passing and waiting opportunities are available.</p>
NBC-2(e)	<p><b>Sight lines</b></p> <p><i>Adequate sight lines consistent with AS/NZS2890.1 clause 3.2.4 should be present where the new road meets the property boundary (for pedestrian sight lines) and the kerb alignment (for vehicles).</i></p>	<p>CJP Consulting Engineers have prepared a response report as part of this RFI (<b>Appendix H</b>). The amended Level 1 architectural plan (DA102) now indicates pedestrian sight lines adjacent to the driveway at the front boundary line.</p> <p>In terms of sight lines at the kerb alignment for vehicles, AS2890.1 Figure 3.2 states that the desirable "5 second gap" sight distance requirement for a 40km/h frontage road (which would be the prevailing vehicle speed at this location) is 55m which is also satisfied.</p>
NBC-2(f)	<p><b>Works required in the public domain</b></p> <p><i>As part of the development, the proponent should undertake the following works to support the residents of the proposed development:</i></p>	<p>The applicant does not object to the construction of a footpath of a minimum width of 1.5m along the site frontage from Kunari Place pathway to the existing footpath network to the east. It is requested that this be included as a condition of consent.</p>

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- Construction of a footpath of a minimum width of 1.5 metres along the site frontage from Kunari Place pathway to the existing footpath network to the east.
- Redesign the intersection geometry in Darley Street West to accommodate two eastbound lanes, one dedicated left and one right and straight through lane. This may require reconstruction of the pedestrian facilities in Darley Street West to meet compliance with TfNSW standards.

CJP Consulting Engineers have prepared a response report as part of this RFI (**Appendix H**). The response report outlines that SIDRA results indicate that the intersection is currently operating at Level of Service A & B and will continue to do so under the proposed development scenario. Furthermore, the traffic survey also indicates that the maximum queue length extending back along Darley Street West from the traffic signals in a 5-minute interval is 5 vehicles, however, the vast majority of the time the queue lengths are 0-2 vehicles. As such, there is no nexus to upgrade the intersection to accommodate two eastbound lanes.

NBC-2(g)

**Other Matters**

*The Construction Traffic Management Plan (CTMP) submitted not endorsed. If the application is approved, the applicant must apply to Council for a CTMP approval after engaging with the Transport Team at Northern Beaches Council to provide guidance on suitable travel routes and construction staging.*

*Any changes to parking restrictions required to facilitate the proposed development would need to be submitted to Council at least 8 weeks prior to the proposed implementation to allow the matter to be considered by the Northern Beaches Council Local Transport Forum.*

Noted.

**Waste**

NBC-3(a)

*The only access to the waste holding bay is across the ramp to the basement parking through roller doors and the loading dock for the transfer of domestic waste, commercial tenants to deposit waste and RACF staff. This is not acceptable without marking out a designated clear marked pathway for movement of bins to and from the bin holding area across the vehicular pathway. An alternative would be to have an access where the building managers room currently sits.*

N/A – based on references in these comments it appears these comments are not relevant to the proposal (for example the comments refer to the following items which are not part of the SSDA proposal; chute discharge rooms, Operational Waste Management Plan prepared by Elephants Foot Consulting in March 2025, commercial waste room, RACF waste).

NBC-3(b)

*The Operational Waste Management Plan and the Architectural Plans do not show:*

- 1. The pathway for movement of domestic waste bins from the chute discharge rooms to the waste holding bay and how this will be achieved safely and not via a conflicting vehicular pathway. If bin moving equipment is to be used which would be necessary to move 660l bins from the basement to the ground floor holding bay, this needs to have a dedicated storage point shown on the plans.
- 2. The pathway for movement of domestic recycling from individual levels to the waste holding area by the building manager/caretaker.

- 3. The pathway for bulky goods to be moved to the ground level for collection and where they will be temporarily stored awaiting collection.
- 4. The pathway for movement of food organics bins to the waste holding area.
- 5. The pathway for the commercial tenants to access the commercial waste storage
- 6. The pathway for the RACF operators to access the RACF waste storage
- 7. The vehicular pathway must be sufficient to accommodate Council's standard waste collection vehicle which is 10.5m long, 3.5m wide and requires 4.5m clearance throughout its path of travel.
- 8. Swept path for Council's standard waste collection vehicle (10.5m long & 4.5m high) should be shown

NBC-3(c)

**Chute and waste storage details**

*Chute inlets within a recycling cupboard which have sufficient room to house a 240L paper recycling and a 240L containers recycling cupboard are present on each level in each core building.*

*Chutes discharge into four basement waste storage rooms with chutes, and a bulky waste storage room can be identified in the basement of the building on the architectural plans. Plans should be updated to show actual 660L bins in chute room and that there is sufficient room for a linear track and for manoeuvring of bins. Bin and track dimensions should be shown.*

*Doors to all waste storage rooms and bulky storage should be a minimum of 1.5m wide (to accommodate the larger sized bins), open outwards and be able to be latched in an open position.*

*The individual chute rooms for each core are acceptable provided doors are of sufficient width. Each chute room will house a 2-bin linear track 660L chute discharge system with a spare service bin. Compaction is not permitted due to damage caused to bins. Residents must not have access to the chute discharge rooms at any time. The Building Manager will be responsible for managing the chute and their bins.*

*Separate FOGO bin storage rooms required as per EFC Operational Waste Management Plan of March 2025. Each building core should have a FOGO waste storage room sufficient to house sufficient 240L bins for that core based on 24L per dwelling per week adjacent to or close to the lifts for each core. Required provisions follow:*

- *Building A – 1032l/week = 4.3;*
- *Building B 1152l/week = 4.8;*
- *Building C1 – 1632l/week = 6.8*
- *Building C2 – 984l/week = 4.1*

*Door openings to recycling bin rooms on each individual level to be minimum 1,200mm (each leaf) opening outwards. Recycling bins will be collected from each level by the building manager as required and moved to the bin holding bay the day prior to collection day. Paper and container recycling will both be weekly.*

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NBC-3(d) **Access and design requirements**

*There should be a separate pathway for access to bin rooms and for moving bins to the waste holding area that does not conflict with a vehicular pathway. Any pathway should accommodate any bin moving equipment and where necessary traffic lights or mirrors be incorporated for safety.*

*The operational waste management plan prepared by Elephants Foot Consulting in March 2025 indicates there is a commercial waste storage room in the basement (page 28). This is not the case. A commercial waste storage holding room of 36m<sup>2</sup> is shown adjacent to the waste holding bay on the Ground floor that is enclosed with a roller door for access. A separate area for the RACF waste is indicated next to the commercial waste storage. Commercial operators must not have access to the domestic waste holding area at any time.*

*There appears to be a column in the waste holding area which is not acceptable. The domestic waste holding bay should be walled off or caged. The column could be incorporated into a wall or cage to enclose the domestic waste holding area. Doors must be a minimum of 1.5m wide opening outwards and able to be latched in an open position for servicing. This is to ensure that the residential waste storage and holding rooms must be secured and must not be accessible to commercial operators within the development at any time.*

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NBC-3(e) **NSW FOGO requirements**

*Provision should also be made to accommodate the NSW FOGO mandate legislated in 2025, Space for food recycling bins would also be required for commercial tenants and the RACF.*

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NBC-3(f) **Service Provision**

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*The standard domestic waste service for MUDs is provided as a wheel in / wheel out service using 240L MGB's from a loading bay adjacent to a waste storage room or waste holding bay. For a development of this size collection is required to be on-site which has been accommodated with the loading bay and waste holding area.*

*The architectural plans and the Operational Waste Management Plan specify 660L bins for putrescible waste collected twice weekly. As stated, NBC Standard service uses 240L bins but use of 660L bins for putrescible waste can be accommodated for this development. Compaction is not supported due the damage caused to the bins and the cost to council of replacement bins. Standard 240l bins will be used for recycling streams and for food organics.*

*Collection of domestic waste, recycling, garden organics\* (\*FOGO) will be by council's domestic waste contractor using a 10.5m HRV requiring 4.5m clearance throughout twice weekly.*

*Bulky waste will be collected on a 5 weekly cycle by council's domestic waste contractor. An enclosed area of 40m2 for presentation of bulky waste at ground level will need to be identified that is accessible for the collection contractor from the loading bay. Doors should be minimum 1.5m wide opening outwards and able to be latched in an open position. Said collection area needs to within 10m access for a collection vehicle*

**NBC-3(g) Advice on building of waste storage rooms**

*All waste storage rooms and holding areas must be built as per the Northern Beaches Waste Management Guidelines and free of any service and utilities infrastructure, pipes, vents, columns or obstructions and have only 90o angle corners.*

**Landscape**

**NBC-4(a) Front setback to Darley Street West**

*Concerns are raised that the landscape setting outcomes within the front setback is restricted by the proposal for structures and utilities, resulting in a poor streetscape presentation, as documented on Plans including the Landscape Plans.*

*Retaining walling and planters of limited width is proposed to support low height planting only. The proposed taller planting within private open space, in areas that an occupant will*

Arcadia have prepared amended Landscape Plans (**Appendix F**) and an Updated Landscape Report (**Appendix G**) which now include mature cabbage tree palms. The inclusion of mature cabbage tree plans offers immediate landscape amenity at the site.

The proponent is open to installing a number of new street trees in Council's road reserve verge. It is requested that this be included as a condition of consent.

*seek greater outdoor useable space may be altered and thus the front setback as documented is unlikely to soften the built form presentation to the streetscape. As documented it is considered the proposed Cabbage Tree Palm planting within the front setback will require decades to provide any landscape amenity and there is limited canopy tree planting proposed.*

*To provide a more suitable landscape setting within the front setback, it is suggested an appropriate outcome is to deliver taller tree and palm planting within a 3 metre wide unobstructed zone across the front boundary frontage, requiring walling/planter layout to be re-organised.*

*Furthermore, the wider landscape zone will allow greater species variation (groundcovers, shrubs and trees) more in keeping with the character of the local area. Tree species should be able to achieve a mature height commensurate to the proposed built form height, and be at suitable and dense planting centres to establish a manageable and effective screening character.*

NBC-4(b)	<p><b>Streetscape Amenity</b></p> <p><i>A footpath extension is required fronting the length of the development site to adjoin to the existing footpath that continues to the Pittwater Road intersection. Additionally, tree planting should be provided within the road reserve verge.</i></p>	<p>The applicant does not object to the provision of a footpath extension and associated tree planting within the road reserve verge. It is requested that this be included as a condition of consent.</p>
NBC-4(c)	<p><b>Eastern side boundary</b></p> <p><i>The basement setback of approximately 2.4 metres from the side boundary limits the long-term establishment of tall tree planting along this boundary and it is noted that the Landscape Plans include both large and small-medium tree planting. Given the restricted deep soil, proposed structures and existing and proposed building alignments, it is suggested that only small-medium trees should be proposed with increased planting centres to establish a manageable and effective screening character.</i></p>	<p>Arcadia have prepared an amended Landscaping Planting Schedule (<b>Appendix F</b>) which shows that all oak trees have been removed from the side boundary. The removal of oak trees guarantees that only small-medium trees are proposed with increased planting centres, which establishes a manageable and effective screening character.</p>
NBC-4(d)	<p><b>Existing trees</b></p> <p><i>No concerns are raised on the recommendations of the Arborist Report.</i></p>	<p>Noted.</p>
<b>Biodiversity</b>		
NBC-5(a)	<p><i>No concerns are raised from a biodiversity perspective as the Pre-Lodgement Meeting recommendations have generally been considered in the submitted documentation.</i></p>	<p>Noted.</p>

NBC-5(b)	<i>It is recommended that the Biodiversity Development Assessment Report (SLR Consulting, November 2025) be resubmitted to ensure strict compliance with the requirements of the requirements of the Biodiversity Conservation Act 2016 – Part 6 division 3 clause 15 (b): “(b) the report is submitted within 14 days after the certification date.”</i>	The BDAR (Appendix X of the EIS) will be amended to ensure compliance with the requirement to submit within 14 days after the certification date. The BDAR will be resubmitted at the earliest opportunity once the updates have been completed.
NBC-5(c)	<i>The section of Avoidance and minimisation of impacts included in the submitted Biodiversity Development Assessment Report (SLR Consulting, November 2025) states that the development footprint has been selected to avoid impacts to areas of higher retention value. However, design options shown in Appendix C – Concept Designs do not highlight the retention of higher value vegetation it is recommended that this point is made clearly evident and that the changes in the footprint of the buildings be highlighted.</i>	The BDAR (Appendix X of the EIS) will be amended with updated concept plans that clearly highlight the retention of higher value vegetation. The BDAR will be resubmitted at the earliest opportunity once the updates have been completed.
NBC-5(d)	<i>Impact mitigation measures included in section 8.4 of the submitted Biodiversity Development Assessment Report should be integrated and referred to in Appendix E – Consolidated Mitigation Measures (Colliers). These mitigation measures will not only reflect the importance of the management of impacts to vegetation but also impact mitigation measures and management strategies in place where adverse events with protected fauna could occur.</i>	The mitigation measures included in Section 8.4 of the submitted BDAR are included within Appendix E of the EIS. Therefore, the mitigation measures reflect the importance of the management of impacts to vegetation but also impact mitigation measures and management strategies in place where adverse events with protected fauna could occur.
NBC-5(e)	<i>It is recommended that the Landscaping Planting Schedule presented in Appendix I (Arcadia, November 2025) be revised to ensure strict compliance with the requirements of Pittwater DCP B4.7 where at least 80% of plants selected belong to the Pittwater and Wagstaffe Spotted Gum Forest Endangered Ecological Community. The inclusion of hybrid and cultivar species is to be avoided and their numbers should not be counted towards the percentage of native plants included in the proposal.</i>	The Updated Landscape Plans prepared by Arcadia ( <b>Appendix F</b> ) include an amended Landscaping Planting Schedule confirming that 89.3% of the proposed landscaping schedule now includes plants belonging to the <i>Pittwater and Wagstaffe Spotted Gum Forest Endangered Ecological Community</i> , ensuring full compliance of Pittwater DCP B4.7.

**Flooding**

NBC-6(a)	<p><b>Flood Level Data</b></p> <p><i>The following flood data comes from the 2019 Newport Flood Study:</i></p> <p><i>The flood characteristics vary across the property due to its natural slope. It is within a Flood Storage precinct and has a floodway bisecting the site. The proposal must account for the effects of climate change, incorporating this into its planning levels and evacuation plans. All FPLs in this document use a CC 1% AEP + 0.5m freeboard.</i></p> <p><i>A Flood Management Report prepared by a suitably qualified engineer should be submitted with the DA. The Flood Management Report should demonstrate compliance with all</i></p>	<p>The FIRA (Appendix Z to the EIS) addresses all LEP and DCP flood controls. Specifically:</p> <ul style="list-style-type: none"> <li>• B3 – All new electrical equipment, power points, wiring, fuel lines, sewerage systems or any other service pipes and connections should be raised and/or located above the FPL details will be provided at CC stage.</li> <li>• C1 – All habitable floor levels are above the PMF level.</li> <li>• C3 – The southern section of building C has been suspended with minimum supporting columns and large spacing to maximise the clear passage of floodwaters and ensure no adverse impacts.</li> </ul>
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requirements in Section B3.11 of the Pittwater DCP and Clause 5.21 of the Pittwater LEP. In particular, please note the following controls:

B3 – New electrical equipment, points, wiring, fuel lines or any other service pipes and connections must be waterproofed and/or located above the FPL of 7.91m AHD for each location.

C1 – The proposed flood levels, including for building C, are at or above the FPL of 7.91m AHD.

C3 – Building C is constructed so that it's above the floodway. The proposed ground floor is an acceptable height, but they will need to ensure no structural support pillars are within the flow path.

D6 – The driveway crest should be at the PMF CC height, with no water entry points into the basement in the FPA.

Guidelines for development on flood prone land and how to prepare a Flood Management Report are available on Council's website.

- The perimeter of the suspended section of building C can be as open design as possible at natural ground level up to each planter level all flood vents.
- Louvre fencing beneath the suspended structure will be designed in accordance with flood-compatible requirements (i.e. ≥50% open) to avoid obstruction of floodwaters. Detailed fencing design will be provided at CC to demonstrate full compliance.
- D6 – The proposed basement driveway entrance on Darley Street remains flood free for all events up to and including the PMF with climate change (i.e. no crest required).

Contributions		
NBC-7(a)	The proposal is to provide for the delivery of a 5% affordable housing contribution to Council (being 5% of the total residential gross floor area (GFA) of the development) in accordance with Councils Affordable Housing Contributions Scheme (the Scheme), Pittwater Local Environmental Plan (LEP) 2014 and Affordable Housing Contributions Scheme Map.	The 5% of the total affordable housing GFA to be provided in accordance with the Pittwater LEP 2014, will be fulfilled as a cash contribution.
NBC-7(b)	The application is to identify 5% of the total GFA to be provided as affordable housing as an equivalent monetary contribution in accordance with the Scheme and PLEP 2014.	As above.
Water Management		
NBC-8(a)	<p><b>Incorporation of Vegetated Stormwater Treatment Elements</b></p> <p>While the proposed stormwater quality treatment system utilising cartridge filtration is noted, it is recommended that, where site constraints allow, the proposal incorporate vegetated stormwater treatment measures (such as bioretention systems, raingardens, vegetated swales, or bio-filtration basins) either:</p> <ul style="list-style-type: none"> <li>• Upstream of cartridge filters as pre-treatment, or</li> <li>• As part of a treatment train in combination with cartridge systems.</li> </ul>	<p>Samana Blue has prepared a letter in response to the incorporation of vegetated stormwater treatment elements at <b>Appendix I</b>. The letter outlines that the site's constraints (flooding to the rear and the provision of deep landscaping requirements to the front and sides) prevent the installation of a bioretention basin of approximately 400 m<sup>2</sup>.</p> <p>In relation to cartridges being proposed, it is noted that:</p> <ul style="list-style-type: none"> <li>• Higher density sites (such as the proposal) typically represent a challenge to incorporate natural surface treatments due to the large area of filter media, the batter requirements of a basin, the incorporation of OSD into a basin, the depth of</li> </ul>

*The rationale for this is that vegetated stormwater systems provide multiple water quality and environmental benefits, including:*

- *Effective reduction of suspended sediments, nutrients, hydrocarbons, and metals*
- *Enhanced hydraulic attenuation, reducing pollutant mobilisation during rainfall events*
- *Improved system resilience and reduced reliance on mechanical filtration alone*
- *Alignment with water sensitive urban design (WSUD) and ecologically sustainable development principles under the Water Management Act 2000*

*Where cartridges are retained, vegetated systems can act as pre-treatment, extending cartridge lifespan and improving long-term performance.*

the outlet needed to connect to Council's pit/pipe system, landscaping requirements, maintenance requirements and others. For these reasons, most infill development sites incorporate proprietary treatment devices within a tank.

- Both RWT reuse and OSD mitigation are required for the larger storm events and a tank was by far the simplest solution for combining this with water quality.
- Once the stormwater is treated within the tank the runoff is then discharged into Council's stormwater system which, within a matter of metres, is conveyed through the adjacent golf course which provides additional further treatment from the large amount of grass and various water bodies (this is in addition to the clean site discharge).
- The Ocean Protect cartridges have been modelled using MUSIC and confirmed to meet Council's pollutant reduction targets (see extract below).

**Table 5 – General Stormwater Quality Requirements**

Pollutant	Performance Requirements
Total Phosphorous	65% reduction in the post development mean annual load <sup>1</sup>
Total Nitrogen	45% reduction in the post development mean annual load <sup>1</sup>
Total Suspended Solids	85% reduction in the post development mean annual load <sup>1</sup>
Gross Pollutants	90% reduction in the post development mean annual load <sup>1</sup> (for pollutants greater than 5mm in diameter)
pH	6.5 - 8.5
Hydrology	The post-development peak discharge must not exceed the pre-development peak discharge for flows up to the 50% AEP

<sup>1</sup>The percentage reduction in the post development mean annual loads are relative to the loads from the proposed development without treatment applied.

Given the above, a cartridge system is deemed to be the most appropriate in this instance.

### 1.3 Government Agencies

The Applicant's responses to the received government submissions are outlined in **Table 3** below.

**Table 3 Government Agency Submissions**

Item	Matters Raised	Responses
<b>NSW Department of Climate Change, Energy, the Environment and Water</b>		
DCCEEW-1	<p><i>The NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and makes post determination recommendations in regard to water licensing and exemption requirements.</i></p> <p><i>DPHI requests the proponent to obtain a water access licence (WAL) to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2025.</i></p>	<p>The Groundwater Impact Assessment (Appendix Q of the EIS) confirms that, as the anticipated dewatering volume is less than 3ML per year, an exemption from requiring a Water Access Licence will be sought.</p>
<b>Conservation Programs, Heritage and Regulation Group</b>		
<b>Biodiversity</b>		
CPHR-1	<p><b><i>Pittwater and Wagstaffe Spotted Gum Forest Ecological Community</i></b></p> <p><i>The Biodiversity Development Assessment Report (BDAR) does not identify that Pittwater and Wagstaffe Spotted Gum Forest (PWSGF) is listed as an entity at risk of serious and irreversible impacts (SAIL).</i></p> <p><i>Section 9.2 of the BDAR states "no candidate SAIL entities have been considered as relevant to the project", however PWSGF is listed as a SAIL entity.</i></p> <p><u><i>Recommended action:</i></u></p> <p><i>Revise the BDAR to:</i></p> <ul style="list-style-type: none"> <li><i>recognise PWSGF as being a SAIL entity</i></li> <li><i>include discussion that addresses Section 9.1.1 of the Biodiversity Assessment Method (BAM) for PWSGF.</i></li> </ul>	<p>The BDAR will be updated to recognise PWSGF as a SAIL entity and will include discussion addressing Section 9.1.1 of the Biodiversity Assessment Method (BAM) in relation to this vegetation community.</p> <p>The updated BDAR will be resubmitted at the earliest opportunity once these updates have been completed.</p>
CPHR-2	<p><b><i>Assessment of planted native vegetation for threatened species habitat under Section D.2 of the BAM</i></b></p>	<p>The BDAR will be updated to clearly reflect the use of both the small area and planted native vegetation streamlined modules and will specifically address Section D.2 of Appendix D of the BAM, including an assessment of the suitability of planted native</p>

*The BDAR does not include an assessment of planted native vegetation for threatened species habitat in accordance with D.2 of Appendix D of the BAM. While the BDAR title states that the streamlined assessment – small area module has been applied, the title does not include mention of the planted native vegetation module.*

*Section 1.2.2 of the BDAR states that areas of planted native vegetation “will be assessed under the streamlined assessment module – planted native vegetation.” However, the BDAR does not clearly identify if the assessment was undertaken or if it is within a separate document. Also, the BDAR does not specifically address the requirements under Section D.2 of Appendix D of the BAM.*

Recommended actions:

- *If the BDAR is intended to combine both the small area and planted native vegetation modules, the title and headings in the BDAR must reflect this.*
- *Specifically address Section D.2 of the BAM in the BDAR including an assessment of the suitability of planted native vegetation for use by threatened species and record any incidental sightings or evidence, for example, scats, stick nests and so on, of both fauna and flora threatened species credit species using, inhabiting or being part of the planted native vegetation.*

vegetation for threatened species habitat and will document any incidental sightings or evidence of threatened species within these areas.

The updated BDAR will be resubmitted at the earliest opportunity once these updates have been completed.

CPHR-3

**Vegetation management plan (VMP) implementation and responsibility details are missing from the EIS and BDAR**

*Section 8.4.1 of the BDAR states that a VMP will be prepared to guide management of the retained areas of vegetation. However, there is no commitment in the EIS, including Appendix E Consolidated Mitigation Measures, and the BDAR does not specify who will be responsible for implementing the VMP and its duration.*

*The VMP should be implemented in perpetuity.*

Recommended action:

- *Include in the EIS a commitment to implement the VMP in perpetuity.*
- *VMP to outline specific implementation actions and assign clear responsibilities for the actions.*

The BDAR will be updated to clearly reflect the use of both the small area and planted native vegetation streamlined modules and will identify the responsible entity for its implementation, with the plan outlining the specific actions and responsibilities required to manage retained vegetation.

The updated BDAR will be resubmitted at the earliest opportunity once these updates have been completed.

The EIS has been updated to include a commitment to implement the VMP in perpetuity (Refer to **Section 6.8** of the EIS).

**Flooding**

Technical input from the Applicant’s existing qualified flooding engineer, Martens, has been prepared to address and respond to the following flooding matters raised by CPHR (refer to **Appendix K**).

CPHR-4 **Flood impacts**

The Flood Impact Risk Assessment (FIRA) provides flood impact mapping for the 1% Annual Exceedance Probability (AEP) and the probable maximum flood (PMF). However, the figures included in the FIRA do not show impacts for less than 0.02m. These figures should be revised to show impacts greater than 0.01m. Flood impacts greater than 0.01m are considered genuine impacts and should be mitigated.

Recommended action:

- Revise the FIRA to include figures showing flood impacts greater than 0.01m and measures to mitigate any significant impacts.

In accordance with Pittwater 21 DCP A1.9, flood level increases of up to 20 mm during the 1% AEP event and 50 mm during the PMF event are not considered to constitute an adverse flood impact.

Nevertheless, the updated flood impact mapping (Attachment B of **Appendix K**), revised to display the 10 mm impact trigger for the 1% AEP event, demonstrates that the proposal results in flood level increases of no more than 10 mm outside the site, indicating no adverse flood impacts to neighbouring properties or the surrounding local area.

CPHR-5 **Floor levels**

Map 19 of the FIRA shows 1% AEP flood levels around Building C at approximately 6.5m Australian Height Datum (AHD) and a floor level of 5.82m AHD. However, the Architectural Drawings show a floor level of 5.62m AHD. CPHR advises that the required freeboard to the 1% AEP flood level has not been provided in the Architectural Drawings.

Map 26 of the FIRA appears to show PMF inundation immediately adjacent to the main area of Building C. The basement and any areas connected to the basement should be protected against PMF inundation.

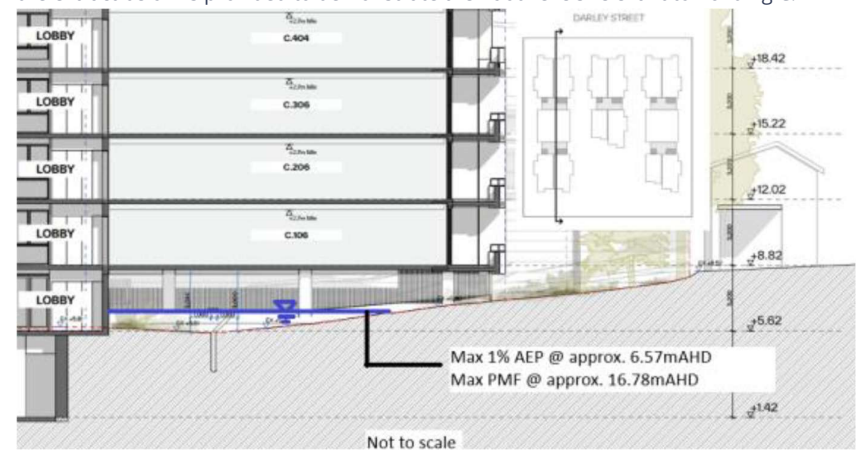
Showing flood levels on the relevant architecture drawings, including Elevation – Building C on DA202 and Section A on DA300, would assist in the review of the floor level requirements.

Recommended actions:

- Revise the floor level of Building C to be above the flood planning level.
- Ensure all openings to the basement are above the PMF level.

The ground floor area of Building C is separated from the flood-affected area beneath the suspended structure by a wall and is not hydraulically connected to the overland flow path beneath the building, which is at approximately RL 6.5 m AHD. The separating wall will be designed as a flood-proofed wall to prevent floodwater entering the building.

Updated Architectural Drawings (Drawing DA300) have been prepared by PBD Architects (**Appendix D**). These include a building section, identified as Section A, and the extract below is provided to demonstrate the floor levels relevant to Building C.



CPHR-6	<p><b>Building C designed with piers and associated fencing/louvres both proposed to be located over overland flow path</b></p> <p><i>Building C is proposed to be suspended over an overland flow path that is classified H5 flood hazard in the PMF, with the structure supported by piers located within the floodplain. High hazard flooding during extreme events would present a risk of structural failure and therefore, the ability of occupants to remain in the building during and after extreme flood events.</i></p> <p><i>Installing piers over an overland flow path represents a poor design outcome. If it is necessary for Building C to extend further south, CPHR recommends that a smaller cantilevered structure would present a better design solution.</i></p> <p><i>Under proposed conditions, the flood hazard under Building C has been increased to H5 in the PMF. To prevent risk to occupants, fencing is proposed across the entire flow path, which is not considered good practice. While the FIRA refers to this as fencing, drawing DA801 appears to show louvres attached to the building. CPHR is concerned that either standalone fencing or louvres attached to the building could lead to blockage and consequently higher flood levels upstream as well as greater potential for structural failure.</i></p> <p><i>CPHR strongly recommends against maintaining Building C over the flow path. However, if it is to remain, it must be demonstrated that the building is able to withstand the forces of floodwaters and debris resulting from a PMF event. This assessment should also consider failure of fencing or louvres and their mobilisation as debris.</i></p> <p><u>Recommended actions:</u></p> <ul style="list-style-type: none"><li>• <i>Reconsider the design of suspended piers at Building C over the overland flow path.</i></li><li>• <i>Reconsider the placement of piers within the overland flow path.</i></li><li>• <i>Reconsider the design of louvres attached to Building C.</i></li><li>• <i>Revise the FIRA to include a blockage assessment for any fencing or louvre arrangement.</i></li><li>• <i>Revise the FIRA to provide preliminary information on structural adequacy, including the consequences of a PMF on structural integrity.</i></li></ul>	<p>Building C is proposed to be partially suspended over the existing overland flow path to maintain flood conveyance beneath the structure. This design approach is consistent with Pittwater 21 Development Control Plan (DCP) B3.11 Clause C3, which permits suspended pier or pile-supported structures provided the underfloor area allows clear passage of floodwaters and remains of an open design.</p> <p>Open-style louvre fencing is proposed beneath the building to restrict access to the high-hazard area while maintaining flood conveyance. The fencing design complies with Clause F1, which requires fencing in flood-prone land to be at least 50% open and not impede flood flows.</p> <p>A conservative 50% blockage factor has been adopted in the hydraulic modelling to account for potential obstruction or debris accumulation, and structural advice (Attachment A of <b>Appendix K</b>) confirms that the suspended structure has been designed to withstand hydraulic and debris loading associated with the PMF event.</p>
CPHR-7	<p><b>Emergency Management</b></p> <p><i>The FIRA includes a section titled Preliminary Flood Emergency Response Plan (FERP). CPHR agrees with the preliminary comments provided in this section. However, it may be</i></p>	<p>Flood warning signage will be installed within flood-affected areas of the site to inform occupants of potential flood hazards during extreme rainfall events. The details of the signage will be confirmed during the detailed design stage and implemented in accordance with the relevant conditions of consent.</p>

*unnecessary and onerous for future occupants to maintain a FERP. Regardless, providing flood warning signage would be useful and be required as a condition of consent if approved.*

*CPHR advises that structural adequacy should not form part of a FERP. Instead, structural adequacy should be included in the FIRA on the basis of Item 6 which is discussed above.*

Recommended action:

- *Include in the conditions of consent the provision of warning signage.*

## Sydney Water

SW-1

### **Critical Assets – Wastewater**

- *The development is opposite a Sydney Water wastewater pumping station, with three (3) associated ventshafts.*
- *There is a risk of odour issues due to the location of the ventshafts in relation to the proposed building and height.*
- *An odour risk assessment on two (2) of the circled ventshafts in diagram 1 will need to be undertaken to understand if the proposed development will experience odour issues which may inform further amendments to the development.*
- *The proponent is advised to defer SSD-91496958 and re-refer to Sydney Water once an odour risk assessment has been undertaken.*

An Odour Risk Assessment (ORA) has been prepared by EnvironOdour and is provided at **Appendix L**. The ORA provides an odour impact assessment for the two identified vent shafts and has been confirmed to have been undertaken in accordance with the relevant EPA technical frameworks and regulations including compliance with a one-second nose-response-time concentration of 2 OU/m<sup>3</sup> as standard for urban areas.

Four elevation planes, in respect to the building's vertical height, have been selected for the assessment to provide a detailed analysis for the entire development. Across these four planes, the modelled odour concentrations do not exceed the regulatory criteria, indicating the proposed development will not experience adverse odour impacts under the meteorological conditions assessed.

Specifically, at the sensitive receptor, the predicted odour concentration increases from 0.4 OU/m<sup>3</sup> at ground level to 0.9 OU/m<sup>3</sup> at an elevation of 9 metres and then plateaus at the worst-case elevation plane of 11 metres. The results have confirmed that the odour concentrations at the sensitive receptor are less than 2 OU/m<sup>3</sup> odour performance criteria specified by NSW EPA.

On this basis, the odour impact assessment for the proposed development is considered compliant with the NSW EPA odour performance requirements. The odour assessment is a pass.

## 1.4 Organisations

The Applicant's responses to the organisation submissions received are outlined in **Table 4** below.

**Table 4 Organisation Submissions**

Item	Summary of Matters Raised	Responses
<b>Mona Vale District Association</b>		
MVDA-1	<i>Scale and type of development inconsistent with surrounding low-rise housing</i>	Refer to <b>NBC-1(a)</b> and <b>PS-1</b> .
MVDA-2	<i>Overshadowing and overlooking of neighbouring properties</i>	Refer to <b>DPHI-10</b> .
MVDA-3	<i>Street parking and traffic over-load particularly movements through the Pittwater Rd - Darley St intersection</i>	Refer to <b>DPHI-13</b> , and <b>NBC-2(a) - (g)</b> .
MVDA-4	<i>Objections made by residents and property owners in Darley Street West, Mona Vale</i>	Refer to responses to public submissions in <b>Section 1.5</b> .
MVDA-5	<i>Affordable housing in one building rather than spread through the 3 residential flat buildings</i>	Refer to <b>DPHI-2</b> and <b>DPHI-3</b> .
MVDA-6	<i>Building over a sewer main and water way</i>	Refer to <b>DPHI-4</b> .
MVDA-7	<i>No mitigation of existing flood and drainage issues</i>	Refer to <b>DPHI-5</b> and <b>NBC-6(a)</b> .
MVDA-8	<i>Loss of tree canopy and non-compliances with LMR Canopy guidelines</i>	Refer to <b>DPHI-18</b> . As per <b>NBC-4(d)</b> , Council raises no issues with the recommendations for existing trees.
MVDA-9	<i>Insufficient common open areas</i>	Refer to <b>DPHI-6</b> .
MVDA-10	<i>No stormwater drain in Darley St according to residents</i>	A stormwater drain inlet is located on Darley Street West at the frontage of 163 Darley Street West as confirmed within the Integrated Water Management Plan (Appendix O of the EIS).
MVDA-11	<i>Developers record of prior consultation with residents is challenged by some residents</i>	Refer to <b>PS-32</b> .
<b>Save Mona Vale</b>		
SMV-1	<b><i>Incompatibility with Local Character and Zone Intent</i></b> <ul style="list-style-type: none"> <li><i>The proposed 6-storey buildings exceed the typical height limits expected in low-density residential zones</i></li> </ul>	Refer to <b>NBC-1(a)</b> and <b>PS-1</b> .

- *The scale of the proposed development is incompatible with the existing suburban, low-rise character of Mona Vale and runs counter to the policy's goals of maintaining the area's residential identity.*

SMV-2	<b>Traffic and Infrastructure Capacity</b> <ul style="list-style-type: none"><li>• <i>The development does not address critical infrastructure upgrades, particularly in terms of transport and parking, which are essential to accommodate the increased population.</i></li><li>• <i>It risks the overloading of local roads and public transport, leading to congestion and increased demand for services like education, healthcare, and water treatment, for which no funding has been committed.</i></li></ul>	Refer to <b>NBC-2(a) - (g)</b> .
SMV-3	<b>Environmental and Ecological Considerations</b> <ul style="list-style-type: none"><li>• <i>The development could strain local environmental infrastructure, such as Warriewood Treatment Plant, potentially contaminating coastal ecosystems, surf breaks, and local marine life.</i></li><li>• <i>Stormwater runoff from such a large-scale development could pollute nearby waterways and harm local flora and fauna, particularly given the development's proximity to the coast.</i></li></ul>	An Integrated Water Management Plan is provided at Appendix O of the EIS.  This confirmed that the proposed development is consistent with the relevant flood management provisions and capable of appropriately responding to flood events. This includes minimising impacts to surrounding developments as a result of runoff. Of note, water sensitive urban design features such as OSD tanks have been implemented to ensure that stormwater impacts are mitigated.
SMV-4	<b>Lack of Community Consultation and Social Sustainability</b> <ul style="list-style-type: none"><li>• <i>The lack of community consultation for this large-scale development is a significant oversight. Without engagement, the proposal risks ignoring local concerns and fails to align with the needs of existing residents. The 14-day exhibition period is clearly not enough time when Pittwater Council for low rise (2 storey) Multi Unit Housing DA's had a minimum of 28 days.</i></li><li>• <i>Without appropriate consultation, the development risks creating social tension and does not adequately address the local expectations regarding the scale, character, and infrastructure required.</i></li></ul>	Refer to <b>PS-32</b> .
SMV-5	<b>Economic and Housing Supply Considerations</b> <ul style="list-style-type: none"><li>• <i>The proposal fails to adequately demonstrate how increased density can be achieved without negatively affecting the liveability of Mona Vale. With insufficient infrastructure and the potential to overwhelm local services, the development could lead to poor long-term outcomes for both existing and new residents.</i></li></ul>	Refer to <b>DPHI-2, DPHI-3, PS-2</b> and <b>PS-9</b> .

- *There is also no clear guarantee that the development will provide affordable housing options or meet the broader needs of the community for this.*

SMV-6

**Precedent for Further High-Rise Development**

Refer to **PS-26**.

- *Approval of this development could create a slippery slope, paving the way for future mid-rise developments. Once a 6-storey development is approved, it will set a precedent for even taller and denser projects, fundamentally altering the character of Mona Vale forever.*

**Strata Plan 3181**

SP-1

**Overdevelopment and Incompatibility with Local Character**

Refer to **NBC-1(a)** and **PS-1**.

- The proposed development will be visually dominant over the existing low-rise/detached dwellings.
- Although visual impact analysis (VIA) impacts are concluded to be “acceptable”, it relies heavily on future policy intent rather than existing lived character, and expressly excludes consideration of visual privacy, outlook, and impacts on private property.
- The development would permanently destroy the local character, alter the sense of openness and seclusion that defines this part of Mona Vale.

The Visual Impact Analysis (Appendix L of the EIS) has been prepared in accordance with the SEARs and relevant NSW guidelines and has included an assessment of the sensitivity and magnitude of the nature of change anticipated by the proposed.

SP-2

**Loss of Privacy and Residential Amenity**

Refer to **DPHI-8**.

- The height, massing, and proximity of the proposed building will result in increased overlooking into neighbouring homes and private open spaces, loss of visual and acoustic privacy, and increased noise transmission both during construction and operation.
- The VIA explicitly excludes visual privacy and outlook from its scope, despite these being critical amenity considerations under section 4.15 of the EP&A Act.

SP-3

**Parking, Traffic, and Local Congestion**

Refer to **DPHI-13** and **NBC-2(a) - (g)**.

- The addition of 82 apartments to a street with limited capacity and constrained access will add to a local experiences that already includes overflow parking into surrounding streets, increased congestion during peak periods, and pressure on emergency vehicle access.

- These impacts are not adequately address when considered cumulatively with other recent approvals/under review developments.

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SP-4

***Construction Impacts and Ongoing Noise***

Refer to **PS-19, PS-20, and PS-21.**

- Residents will be exposed to:
  - Extended construction noise and vibration
  - Heavy vehicle movements along narrow residential streets
  - Dust, disruption, and loss of quiet enjoyment
  - Mechanical plant including air conditioning units, hot water pumps & lift overrun noise
  - Electrical sub-station noise “humming” and electromagnetic field levels given the proposed location on north-western boundary directly adjacent to 10 Kunari Place.
  - Fire alarms, sump / pump alarms

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SP-5

***Flooding Risk and Inadequate Stormwater Management***

Refer to **DPHI-5, NBC-6(a), CPHR-4 - 7, and PS-15.**

- The site is located within a sensitive catchment draining toward Cahill Creek and Pittwater. Residents already experience:
  - Localised flooding during heavy rainfall
  - Surface water runoff and pooling recently contributed to the collapse of the retaining wall on boundary between 10 Kunari Place and the public walkway to Darley Street West
  - Surface water runoff along Darley Street West
- There are serious concerns that stormwater detention and management measures will be insufficient in extreme weather events, increasing downstream impacts.
- Contrary to the Flood Impact & Risk Assessment, the north-western corner of the site is not a paved road but rather the adjoining residences on Kunari Place. An increase in impervious area will further exacerbate run-off. Other miscalculations are believed to be present in the Stormwater Concept Design.

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SP-6

***Environmental Harm and Loss of Biodiversity***

Refer to **NBC-5(a) - (e).**

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- The proposal involves tree removal and site disturbance that will reduce urban canopy and habitat, increase urban heat impacts, and risk sediment and pollutant runoff into Cahill Creek and ultimately Pittwater waterway.
- Accompanying environmental technical reports fail to adequately address the site.

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SP-7	<b><i>Sewerage Infrastructure and Odour Impacts</i></b>	Refer to <b>SW-1</b> .
	<ul style="list-style-type: none"><li>• The site is adjacent to sewerage infrastructure / pumping station (SPS414) that already produces intermittent but strong odours, particularly in warm weather with north-easterly winds. The development raises concerns in relation to this but is not meaningfully addressed.</li></ul>	
SP-8(a)	<b><i>Incompatibility with Neighbouring Character at the Interface</i></b>	Refer to <b>NBC-1(a)</b> and <b>PS-1</b> .
	<ul style="list-style-type: none"><li>• The proposal fails to respond to the dual character condition on the immediate area and instead applies a uniform, high-density built form across the entire site.</li><li>• This results in a development that does not respect the established low-rise scale, introduce visually intrusive built form, and permanently alters the character and amenity of Kunari Place.</li></ul>	
SP-8(b)	<b><i>Privacy, Overlooking, and Visual Dominance at the R3-R2 Boundary</i></b>	The Visual Impact Analysis (Appendix L of the EIS) has been completed in accordance with the relevant visual impact guidelines. Under common planning principles from the GLVIA-3, views towards sky are not iconic elements and therefore do not warrant a detailed VIA assessment.  The proposal appropriately addresses overlooking through mitigation measures that have been adopted to minimise the visual privacy impacts on neighbouring residents. This is further discussed in <b>DPHI-8</b> .
	<ul style="list-style-type: none"><li>• The proposal will not meet overlooking, dominance, bulk, and sky view expectations.</li><li>• These items are not addressed in the VIA.</li></ul>	
SP-8(c)	<b><i>Excessive Height and Ground Level Disparity at the Interface</i></b>	Refer to <b>PS-12</b> .  Updated Architectural Drawings are provided at <b>Appendix D</b> .
	<ul style="list-style-type: none"><li>• Meeting the maximum height under the Housing SEPP does not mean the height is acceptable at a sensitive R3-R2 boundary.</li><li>• The proposed development is located approximately 1.5 metres above the natural ground level of 10 Kunari Place, resulting in a material increase in perceived height, bulk, and visual dominance when viewed from the adjoining R2 property.</li><li>• The building setbacks noted in the EIS are different to those shown on plans.</li></ul>	

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SP-8(d)	<b><i>Failure to Provide an Appropriate Transition in Built Form</i></b>	The proposed development is entirely compliant with height and density controls on the site afforded through the Housing SEPP. The proposal is also consistent with the objectives of the ADG to provide high amenity outcomes for surrounding development.
	<ul style="list-style-type: none"><li>• The development presents a full-scale R3 outcome directly to the R2 boundary, contrary to sound planning practice and the objectives of both zones.</li><li>• Reliance on compliance with Housing SEPP numerical standards does not remove the requirement to manage amenity impacts at sensitive zone interfaces.</li></ul>	
SP-8(e)	<b><i>Public Interest Considerations</i></b>	The emerging character of Mona Vale is for low and medium density housing, as envisioned through the NSW Government's LMR policy. As such, the proposed development entirely aligns with both the housing delivery objectives and the future medium density character of Mona Vale. Notwithstanding, the proposal has implemented design responses to deliver a development outcome that does effectively manages its impacts on the existing surrounding context, and balances this with the need to deliver new housing, including affordable housing.
	<ul style="list-style-type: none"><li>• Housing delivery objectives do not justify avoidable and permanent amenity loss to established low density communities, particularly where alternative design responses are available.</li></ul>	
SP-9(a)	<b><i>SEPP Affordable Housing Height Bonuses and Limitations</i></b>	The proposed development will deliver 10 affordable dwellings, equivalent to 10.5% of the total GFA. This affords the site a height of building and FSR bonus of 21% under the Housing SEPP. The proposal incorporates these bonuses in a sustainable way through setbacks, stepping, and building articulation. Notwithstanding, a comprehensive assessment against the ADG, including solar access and privacy which have been provided in the Updated Design Report prepared by PBD Architects ( <b>Appendix E</b> ). Additionally, the proposal includes a monetary contribution that will be provided in accordance with the Northern Beaches Council's Affordable Housing Contribution Scheme.
	<ul style="list-style-type: none"><li>• The development achieves six storeys through application of SEPP provisions but does not materially demonstrate adequate affordable housing delivery with sustainable community benefit, nor does it satisfactorily justify why this bonus should apply given the undue impacts on adjoining R2 properties such as loss of privacy, visual dominance, and character impacts.</li></ul>	
SP-9(b)	<b><i>Low &amp; Mid-Rise Housing Reforms Do Not Remove Amenity Responsibilities</i></b>	The proposed development represents a high-quality built form that is responsive to both the existing character of its surroundings and the emerging character intended through the LMR. The proposal includes a façade treatment and materiality that is consistent with the seaside nature of Mona Vale while generous setbacks and modulation ensure that the building does not dominate the streetscape or buildings within its immediate context.
	<ul style="list-style-type: none"><li>• The proposal's failure to provide appropriate interface treatment calls into question the suitability of applying LMR reforms to this site, particularly where impacts are not mitigated.</li></ul>	
SP-9(c)	<b><i>Public Transport Justification Is Unsound in this Local Context</i></b>	Noted. Public transport cancellations are not within the remit of the Applicant. The height sought through the proposal is consistent with the bonuses afforded to the site through both the LMR policy and affordable housing bonus.
	<ul style="list-style-type: none"><li>• The policy assumption that the site benefits from "good public transport" is flawed. Reliance on buses that are frequently cancelled or under threat of service cuts does not equate to high-quality, sustainable transport connectivity that would justify significantly higher density. This inconsistency suggests that justification for height</li></ul>	

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increases based on transport proximity is weak in this context and should be weighed carefully.

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1.5 Public

The Applicant's responses to the public submissions received are detailed in **Table 5** below.

**Table 5** Public Submissions

Item	Summary of Matters Raised	Raised in	Responses
<b>Character of the area</b>			
PS-1	<p><b>Bulk and scale</b></p> <ul style="list-style-type: none"> <li>The bulk and scale of the development was considered excessive for the area given the existing low-density character and nature of Darley Street West as a cul-de-sac street.</li> <li>The development represents overdevelopment, appearing out of scale and inconsistent with surrounding housing mix. Incompatibility with the surrounding development will detrimentally change the fabric of the suburb.</li> <li>The bulk and scale of the development will impact upon the costal values of Mona Vale, including tourism and sense of relaxation.</li> </ul>	65 submissions	<p>Refer to <b>NBC-1(a)</b>. The proposed built form seeks to deliver a high-quality urban design outcome and has considered the emerging character of the surrounding development.</p> <p>The proposal represents a high-quality approach to bulk and scale, falling entirely within the applicable planning controls afforded through the site's proximity to Mona Vale town centre under the LMR policy. The proposal recognises the development potential of the site to sustainably uplift residential dwellings in a well-serviced and located area.</p> <p>The density of the development is consistent with the emerging character of Mona Vale that is envisioned by the policy, which intends to increase density and housing supply near nominated town centres. The proposal employs a range of architectural features and design elements, including stepped heights, façade articulation, and generous setbacks, that have been implemented to break up bulk and contribute to a built form that responds to its local context.</p>
<b>Existing infrastructure</b>			
PS-2	<p><b>Insufficient existing infrastructure</b></p> <ul style="list-style-type: none"> <li>Additional strain is placed on road and transport networks (active, public, private) which already underservice the area.</li> <li>Existing social/community infrastructure including schools, hospitals and open are not equipped to accommodate the increase in residents.</li> </ul>	64 submissions	<p>The Applicant will pay contributions in line with the Northern Beaches Section 7.12 Contributions Plan, Affordable Housing Contributions Scheme, and the state Housing and Productivity Contributions. These contributions will go towards a range of local, regional, and state infrastructure including transport, health, education, and open space. The Sydney Water Anticipated Notice of Requirements also requires payments of Sydney Water DSP contributions.</p> <p>An Odour Impact Assessment has been prepared by EnvironOdour (<b>Appendix L</b>) in relation to the existing sewage service in Darley Street West. Refer to <b>SW-1</b>.</p>



- Servicing infrastructure including electricity, stormwater, and drainage will be unable to cope with increases in population and usage.
- The proximate existing sewage service already emits strong and unpleasant odours in Darley Street West. Increases in population will result in worse outcomes. Sewage treatment and infrastructure need to be increased.
- Infrastructure upgrades should occur before development construction begins.

It is intended that the proposal will include standard augmentation of servicing infrastructure. Notably, the Anticipated Notice of Requirements from Sydney Water confirms the site can be serviced by existing infrastructure.

Transport and access			
PS-3	<b>Parking</b> <ul style="list-style-type: none"><li>• The proposal does not include any off-street visitor parking which will cause increased demand for on-street parking. On-street parking is already limited, with additional parking demand as a result of the proposed development likely to contribute to parking stress in surrounding streets and Mona Vale town centre.</li><li>• Additional on-street parking will result in increased traffic and congestion in an already busy cul-de-sac road, leading to unsafe parking behaviours that block views and create tight/narrow conditions.</li></ul>	62 submissions	The proposal provides a quantum of parking that exceeds the applicable minimum requirements set out in the Housing SEPP. Visitor spaces are not mandated under the Housing SEPP and therefore are not a requirement. While no visitor spaces are provided, it is anticipated that existing on-street parking is capable of accommodating the proposal given there is unrestricted kerbside parking permitted along the majority of the Street and the site frontage, and the there is angled parking directly opposite the site.

PS-4	<p><b>Traffic generation, congestion, and safety</b></p> <ul style="list-style-type: none"> <li>• The proposal is located on a cul-de-sac meaning there are no alternative routes that are capable of absorbing extra traffic. This means that all additional trips will defer to existing roads and cumulate into congestion.</li> <li>• The cul-de-sac limits circulation, increasing congestion and turning movements within Darley Street West. Often, due to the constant on-street parking on both sides, Darley Street West operates as a single lane road.</li> <li>• The increase in cars and traffic will result in existing residents struggling to exit and enter their driveways. Additional resident vehicles, deliveries, and waste-collection movements will worsen congestion and reduce amenity.</li> <li>• Traffic signalling (traffic lights) and calming devices need to be considered or better managed to ensure that vehicles can complete safe turns without safety risks or congestion.</li> <li>• Darley Street West is a narrow, constrained, and heavily parked street resulting in limited passing opportunities and poor sightlines.</li> <li>• The site is within a cul-de-sac meaning all traffic enters and exits at the same point leading to increased risk and congestion.</li> <li>• Darley Street West intersection is already dangerous and will be exacerbated by the development.</li> <li>• Increased density in the already busy Mona Vale town centre and on Darley Street West is dangerous due to high pedestrian activity.</li> <li>• Proximity to schools must be considered in regard to pedestrian safety.</li> </ul>	100 submissions	<p>Traffic considerations have been extensively addressed above. Refer to <b>NBC-2(a)</b> to <b>NBC-2(g)</b>.</p>
PS-5	<p><b>Traffic and Transport Assessment Report</b></p> <ul style="list-style-type: none"> <li>• The Traffic and Transport Assessment:                     <ul style="list-style-type: none"> <li>- Does not model real world conditions or assess cumulative impacts.</li> <li>- Does not account for bus service capabilities.</li> </ul> </li> </ul>	21 submissions	<p>The Transport Impact Assessment at Appendix M of the EIS was completed in alignment with the SEARs requirements and the <i>Guide to Transport Impact Assessment</i> published by TfNSW. The report provided an accurate assessment of the relevant matters for consideration including:</p> <ul style="list-style-type: none"> <li>• An overview of the existing conditions and proposed development;</li> </ul>

- Uses outdated modelling and data.
  - Has errors such as incorrect street names and parking provision.
  - The report should be reviewed by Transport for NSW.
  - The traffic report accompanying the SSDA is not a Traffic Impact Assessment and does not comply with the Guidelines for TIA or the SEAR requirements in that no traffic counts or directional flow data is provided, no SIDRA modelling, parking rates are ignored, level-of-service assessments are omitted.
- Traffic generation and impact;
  - Parking assessment and accessibility;
  - Design assessment; and
  - A Preliminary Construction Traffic Management Considerations.

PS-6	<p><b>Public transport services</b></p> <ul style="list-style-type: none"> <li>• Public transport accessibility is question given closest services are located over 1km away from the site.</li> <li>• Mona Vale has no other public transport or mass transit alternatives meaning that all residents will use the existing, congested options.</li> <li>• Existing transport services are limited and infrequent resulting in restricted coverage with no indication of extension/improvement.</li> <li>• Increasing density without corresponding transport capacity will worsen congestion and reduce access to employment.</li> </ul>	35 submissions	<p>As discussed in <b>DPHI-1</b>, the proposed development benefits from a pedestrian link to Kunari Place, affording the site walkable access to Maxwell Street bus stop 341m away. This bus stop is serviced by regular 182 and 155 bus services, with at least one (1) bus per hour servicing the bus stop between 6am and 9pm each day from Monday to Friday, both days inclusive, and 8am and 6pm on each Saturday and Sunday.</p> <p>Notably, the site is also located within 800m of Mona Vale town centre which is serviced by frequent services that connect the area to key employment precincts.</p>
PS-7	<p><b>Emergency vehicle access</b></p> <ul style="list-style-type: none"> <li>• Emergency vehicle access will be compromised (as a result of congestion in both Darley Street West and broader Mona Vale area).</li> </ul>	26 submissions	<p>Traffic considerations have been extensively addressed above. This includes a response to the circulation of large vehicles and their access to the subject site, as well as sightlines for vehicles. Refer to <b>NBC-2(a)</b> to <b>NBC-2(g)</b>.</p>
PS-8	<p><b>Topography</b></p> <ul style="list-style-type: none"> <li>• Steep topography makes walking impractical for older residents and children.</li> <li>• Older residents will be functionally car-dependent, despite being technically within 800m of Mona Vale Village.</li> <li>• Route to public transport has insufficient infrastructure, path is muddy, with uneven surfaces, not well lit and lack shelter facilities, not suitable for persons with disabilities.</li> </ul>	6 submissions	<p>The topography of site is pre-existing and changes to the public domain are outside of the scope of works on the land owned, including access to public transport. Notwithstanding, the site remains within 400m walking distance to a frequent bus service, access via Kunari Place.</p> <p>Allocated parking is provided per apartment to service the transport requirements of the residents, including vehicular access for older residents.</p>

**Housing**

PS-9	<b>Affordable housing</b> <ul style="list-style-type: none"> <li>Affordable housing is considered unrealistic given the prevailing property values of the area – affordable housing isn't “genuinely affordable”.</li> <li>Height bonuses as a result of affordable housing provision is unjustified given the limited number of dwellings.</li> <li>Affordable housing allocation is too low and should be higher.</li> </ul>	41 submissions	<p>The proposed development will provide 10 affordable apartments, equivalent to 10.5% of the overall GFA of the proposed development. This qualifies the site for height and floor space ratio bonuses in accordance with Chapter 2 of the Housing SEPP.</p> <p>Additionally, the proposal includes a monetary contribution that will be provided in accordance with the Northern Beaches Council's Affordable Housing Contribution Scheme.</p>
PS-10	<b>Housing diversity and equity</b> <ul style="list-style-type: none"> <li>Displacement of residents becomes a risk as a result of strata renewal scheme.</li> <li>Mona Vale is unlikely to ever be affordable for young families, undermining young buyers.</li> </ul>	6 submissions	<p>The proposal includes a mix of sizes and housing types (including adaptable and affordable apartments) that are capable of catering to all family structures and individuals. Notwithstanding, the increase in dwelling capacity on the site aligns with a myriad of State strategic directions to promote housing stock and affordability within Greater Sydney. The increased supply of housing on the site represents a high-quality outcome for future residents, including young families.</p> <p>The proposed development is not a strata renewal site.</p>
PS-11	<b>Need for housing</b> <ul style="list-style-type: none"> <li>Other housing developments in the area have high vacancies, making it evident that there is little need for new development of this scale.</li> </ul>	2 submissions	<p>The size, configuration and mix of apartments appropriately responds to current and projected demand and includes accessible and affordable housing in proximity to public transport and social infrastructure.</p>
<b>Height</b>			
PS-12	<b>Height of building</b> <ul style="list-style-type: none"> <li>The height of buildings is inappropriate given local context, especially within a cul-de-sac with only one point of entry and exit.</li> <li>The tall building will stand above the prevailing single and double storey development, resulting in visual dominance, loss of views, and elevated outlook impacts.</li> </ul>	32 submissions	<p>The height of building proposed is entirely compliant with the relevant height controls contained within Chapter 6 of the Housing SEPP that apply to the site. The proposal also includes the provision of 10.5% affordable housing which affords bonus height controls under Chapter 2 of the Housing SEPP.</p> <p>Given the applicability of the Housing SEPP controls to the LMR area, which encompasses all R2 and R3 residential zoned areas within 800m of Mona Vale town centre, the height of building is consistent with the emerging character of the area and future height datum. Notwithstanding, the proposal has been designed to respond to its unique site location and topography through stepping and articulation which reduce built form impacts on the public domain.</p>

PS-13	<b>Overshadowing</b>	39 submissions	Overshadowing impacts have been addressed above. This includes a discussion of the proposal's consistency with the ADG. Refer to <b>DPHI-10</b> .
	<ul style="list-style-type: none"> <li>The proposed development will result in increased overshadowing and reduced solar access to surrounding development. This will reduce residential amenity, quality of life, and impact health as a result of increased mould growth, damp conditions, reduced light, etc.</li> <li>Neighbouring properties with reduced sunlight will have a higher dependency on artificial heating.</li> </ul>		
PS-14	<b>Privacy</b>	20 submissions	Visual privacy impacts have been addressed above. This includes a discussion of the proposal's consistency with the ADG. Refer to <b>DPHI-8</b> .
	<ul style="list-style-type: none"> <li>Adjoining properties will suffer from loss of privacy and amenity as a result of overlooking.</li> </ul>		
<b>Natural Disasters</b>			
PS-15	<b>Flooding</b>	54 submissions	<p>A Flood Impact and Risk Assessment and Integrated Water Management Plan have been appended to the EIS at Appendix Z and Appendix O, respectively. A Flood Management Response has also been provided in response to DPHI and Council submissions as part of the response to submissions stage at <b>Appendix K</b>.</p> <p>These inputs confirm that the proposed development is consistent with the relevant flood management provisions and capable of appropriately responding to flood events. This includes minimising impacts to surrounding developments. Of note, water sensitive urban design features such as OSD tanks have been implemented to ensure that stormwater impacts are mitigated.</p>
	<ul style="list-style-type: none"> <li>The proposed development will result in a net reduction in grassed areas and increase in hard surfaces, contributing to increased runoff. Downstream impacts on the broader drainage network and surrounding properties are not adequately considered or mitigated.</li> <li>The site is low-lying, putting the proposed multi-level basement at risk of flooding and property damage.</li> <li>Climate change is resulting in more frequent and worse flooding events which require consideration.</li> <li>Relevant accompanying technical reports are not provided including a groundwater impact assessment, dewatering management plan, hydrostatic uplift modelling, contamination risk assessment, long-term pump-out strategy leading to insufficient information in regard to structural soundness and human safety in event of flooding events.</li> </ul>		
PS-16	<b>Bushfire</b>	15 submissions	The site is not located within a bushfire risk area as confirmed through the NSW RFS Property Search. A Bush Fire Assessment was not considered to be required for the development.
	<p>Bushfire impacts and risk as a result of the site's adjacency to bushland and bushfire prone vegetation.</p>		

PS-17	<b>Emergency response and evacuation</b> <ul style="list-style-type: none"> <li>Limited evacuation routes out of Mona Vale, which have already demonstrated bottlenecking and gridlock in previous events, will be severely impacted by the increase in population.</li> <li>Emergency response and evacuation strategies are hindered.</li> </ul>	14 submissions	Evacuation strategies on a regional scale falls outside the remit of the Applicant.
<b>Sustainability</b>			
PS-18	<ul style="list-style-type: none"> <li>The proposal appears to have heavy reliance on mechanical heating and cooling with no strong commitment to passive solar design, natural ventilation, or a climate responsive layout.</li> </ul>	3 submissions	The proposal is supported by an Environmentally Sustainable Development (ESD) Report which confirms that the proposed development meets the relevant energy and water reduction targets and incorporates a range of initiatives into the development such as thermal insulation, efficient lighting systems, energy monitoring, rainwater re-use, and reduced greenhouse gas emissions.
<b>Construction</b>			
PS-19	<b>Construction noise impacts</b> <ul style="list-style-type: none"> <li>Additional noise generated through truck movements, demolition, building.</li> </ul>	7 submissions	Construction noise impacts including levels of noise activity and construction hours are to be addressed in standard conditions of consent.
PS-20	<b>Construction traffic impacts</b> <ul style="list-style-type: none"> <li>Darley Street West is unsuitable for construction of this size, including accommodating increased workers and vehicles during construction, large trucks and their swept paths/turning circles.</li> <li>Increase in heavy vehicles will reduce safety for pedestrians, cyclists, and other motorists.</li> </ul>	15 submissions	A Construction Traffic Management Plan would be provided prior to Construction Certificate (CC).
<b>Operational noise and light impacts</b>			
PS-21	<b>Acoustic and light impacts</b> <ul style="list-style-type: none"> <li>Noise impacts of proposed servicing, air conditioning, lifts, balconies, communal areas, etc. on surrounding development.</li> <li>Light spill generated by the proposal.</li> </ul>	8 submissions	Operational acoustic and light impacts would be addressed as part of CC.
<b>Waste management</b>			

PS-22	<ul style="list-style-type: none"> <li>The proposal fails to consider impacts of increased waste collection vehicles on constrained streets and cumulative impacts from multiple high-density developments.</li> <li>Insufficient bin volumes are provided for the development.</li> </ul>	12 submissions	An Operational Waste Management Plan has been provided at <b>Appendix Y</b> of the EIS. The report was prepared in accordance with the relevant State legislative requirements.
<b>Environmental impacts</b>			
PS-23	<p><b>Negative environmental impacts</b></p> <ul style="list-style-type: none"> <li>The proposed development's construction and operation will result in the loss of tree canopy, disruption of biodiversity, and ground conditions as a result of significant cut and fill.</li> <li>The site and surroundings are considered environmentally sensitive and habitat to a range of sensitive fauna species. The development will result in habitat fragmentation and disturbance of the natural environment.</li> <li>The disruption of acid sulfate soils may create unhealthy conditions.</li> </ul>	18 submissions	Biodiversity impacts have been addressed above. Refer to NBC-5(a) to NBC-5(e) in Council Submission at <b>Section 1.2</b> . An updated BDAR will be resubmitted at the earliest opportunity.
PS-24	<p><b>Insufficient environmental assessment</b></p> <ul style="list-style-type: none"> <li>Reports and plans demonstrate disparities in relation to tree removal details.</li> <li>Omission of important considerations (shadowing impacts on the environment, microbat surveys).</li> <li>Inaccurate flood surveys and groundwater assessment.</li> <li>Biodiversity report claims limited connectivity to vegetation with Kuring-gai National Park which is incorrect.</li> </ul>	3 submissions	<p>The Applicant has provided a range of updated plans including updated shadow diagrams within the Updated Architectural Drawings at <b>Appendix D</b>, Updated Landscape Plans at <b>Appendix F</b>, and responses to flood matters raised by DPHI and Council in Flood Management Response at <b>Appendix K</b>.</p> <p>Biodiversity impacts have been addressed above. Refer to <b>NBC-5(a) - (e)</b>. An updated BDAR will be resubmitted at the earliest opportunity.</p>
<b>Community/public impacts</b>			
PS-25	<p><b>Fails to deliver public benefit</b></p> <ul style="list-style-type: none"> <li>The development fails to deliver lasting community benefit and prioritises density over community wellbeing.</li> <li>Concerns over the tenancy of affordable housing after 15 years.</li> </ul>	9 submissions	<p>The proposal includes the provision of 10 affordable dwellings, equivalent to 10.5% of the total GFA. Additionally, the proposal includes a monetary contribution that will be provided in accordance with the Northern Beaches Council's Affordable Housing Contribution Scheme.</p> <p>Separate to the affordable housing provision, the proposed development will also make relevant monetary contributions in accordance with the Council's s7.11 plan and the State Governments Housing and Productivity</p>

Contributions. These monetary contributions will go towards improvements to local and state infrastructure.

Moreover, the proposal provides significant communal open space which is able to improve way of life and sense of belonging for residents. Future residents will also benefit from the site's excellent walkability, contributing to a healthy built environment.

### Future development

PS-26	<p><b>Sets a precedent for future development</b></p> <ul style="list-style-type: none"> <li>The increased density and height proposed will set a precedent for future development which will alter the current urban fabric of Mona Vale.</li> </ul>	11 submissions	<p>The character of Mona Vale is subject to change following the introduction of the NSW Government's LMR policy, which includes Mona Vale as a designated town centre. Development within an LMR area is afforded increased height and floor space ratios above those stipulated within the LEP. As such, it is the intent of the NSW Government that the site and its surrounds will be uplifted to provide increased housing in a well-located area. This development represents the first to utilise these controls and will therefore lead the emerging character of the area.</p>
PS-27	<p><b>Future demand trends</b></p> <ul style="list-style-type: none"> <li>Development should be restricted to existing urban areas and focussed on communities outside of Greater Sydney.</li> </ul>	2 submissions	<p>The proposal responds to national and state strategic objectives to increase housing supply in Greater Sydney, responding to population forecasts that demonstrate demand for housing in existing urban areas such as Mona Vale.</p> <p>The size, configuration and mix of apartments appropriately responds to current and projected demand and includes accessible and affordable housing in proximity to public transport and social infrastructure.</p>

### Heritage

PS-28	<ul style="list-style-type: none"> <li>The proposal will disturb heritage items and the history of Mona Vale Village.</li> </ul>	1 submission	<p>The site is not identified as a heritage item nor is it located in a heritage conservation area. The closest heritage item is 500m north of the site, opposite Bayview Golf course, and the design of the development has been carefully considered to reflect the surrounds and existing context. This includes adopting a high-quality materiality and façade that does not dominate its surroundings and appropriately reflects the seaside locality of Mona Vale.</p>
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### Planning controls and standards

PS-29	<p><b>ADG, LEP, DCP guidance</b></p> <ul style="list-style-type: none"> <li>The proposal does not adhere to or consider the ADG or DCP. Non-compliance with these provisions including setbacks, separation, overshadowing, and parking result in negative impacts for the community and residents.</li> <li>Previous changes in zoning on the site has enabled the overdevelopment.</li> <li>Height exceedances over the controls within the LEP.</li> </ul>	15 submissions	<p>Given the proposal is an SSD, compliance with or consideration of the DCP is not a statutory requirement. Notwithstanding, the development attains a high-quality design outcome that generally aligns with the objectives of the Pittwater DCP in that a high level of amenity is provided for both residents of the proposal and surrounding developments.</p> <p>The proposal includes a comprehensive assessment of the ADG (within <b>Appendix E</b>) and is compliant with, or provides an alternative solution, to all relevant controls.</p> <p>Of note, the proposal's height is compliant with State legislation which grants the site additional height and floor space ratio as a result of its proximity to Mona Vale town centre and its provision of affordable housing. As such, the height of building is permitted to exceed the control stipulated in the LEP.</p>
PS-30	<p><b>Inconsistencies with state directives and Housing SEPP</b></p> <ul style="list-style-type: none"> <li>The proposal does not align with the strategic intent of the Low and Mid-Rise Housing reforms.</li> <li>The proposal is located outside of the LMR zone.</li> <li>The site and its conditions/constraints make it unsuitable for increases in height and density afforded by the LMR reforms.</li> <li>Council has demonstrated past opposition to the LMR and previous rezonings, beckoning questions as to how even further development has been considered.</li> <li>The Housing SEPP does not mandate affordable housing resulting in affordable housing provisions that are too low.</li> <li>The proposal departs from Council and State strategic documents and targets.</li> </ul>	20 submissions	<p>The proposal utilises height of building and floor space ratio increases attained through Chapter 6 of the Housing SEPP. Given the site is located within 800m of a designated town centre, Mona Vale town centre, the proposal is afforded a built form and scale of development that reflects the strategic intent of the NSW Government's LMR policy – to increase housing supply within well-located areas.</p> <p>Importantly, the proposal includes affordable housing provision that aligns with the requirements of Chapter 2 of the Housing SEPP to receive height of building and floor space ratio bonuses.</p>
<b>Plans</b>			
PS-31	<ul style="list-style-type: none"> <li>Architectural Plans are inaccurate, showing the incorrect scale, building positioning, and location.</li> </ul>	1 submission	Updated Architectural Drawings are provided at <b>Appendix D</b> .

## Community engagement and consultation

PS-32	<b>Insufficient community engagement</b> <ul style="list-style-type: none"><li>• Throughout the SSDA process, minimal community engagement has been undertaken and limited evidence has been provided on completed activities.</li><li>• Engagement that took place was generalised and not meaningful, with limited evidence base and targeted consultation. "Questionable" information was provided throughout the engagement activities and some questions were not addressed at all.</li><li>• Exhibition period occurred during school holidays and a public holiday, making it more difficult to provide responses.</li></ul>	14 submissions	<p>The community consultation undertaken throughout the duration of the SSDA has been completed in accordance with the SEARs requirements and the <i>Undertaking Engagement Guidelines for State Significant Projects</i>, including:</p> <ul style="list-style-type: none"><li>• Engaging with the relevant NSW Government agencies, services providers, Council, close neighbours and targeted members of the community who are most likely to be impacted or interested in the proposal;</li><li>• Informing the surrounding community to the site about the proposal and providing opportunities to engage directly with the project team;</li><li>• Explaining how community feedback will be considered and documented;</li><li>• Providing relevant information in plain English so that potential impacts and implications can be readily understood; and</li><li>• Providing channels of communication to gather feedback.</li></ul> <p>An Engagement Report and Community Engagement Table has been provided at Appendix G and Appendix D of the EIS respectively. These confirm the engagement activities have been completed to a high standard.</p>
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