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**Contact: Luke Donovan**

**Ref:**

SSD-73603959

26 March 2025

Department of Planning Housing and Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

Via: NSW Major Projects portal

**Attention:** Mia Mills

Dear Madam,

**RE: SUBMISSION TO SSD-73603959, UPA WAHROONGA SENIORS HOUSING**  
**Address: 1610, 1614-1634 Pacific Highway and 5 Munderah Street, Wahroonga**

Thank you for the opportunity to comment on State Significant Development (SSD) application (SSD-73603959) for the proposed alterations and additions to a seniors housing development at 1610, 1614-1634 Pacific Highway and 5 Munderah Street, Wahroonga.

This submission should be considered as an **objection** to the proposal. The submission (**Attachment 1**) gives a detailed explanation of the reasons for Council's objection.

The key issues with the proposal include the scale and setback of Building 6 to Munderah Street, overshadowing to and overlooking of 1-3 Munderah Street, lack of articulation to Building 3 fronting Pacific Highway, the subterranean condition of apartments within Building 2, building separation between Buildings 1 and 2, building footprint and setbacks to biodiversity mapped lands, Aboriginal Heritage, excessive car parking, lack of bicycle parking and inadequacies of the construction and traffic management plan.

It is requested that the Applicant's Response to Submissions (RtS) is forwarded to Council for review prior to a determination being made. Council will be able to provide recommended conditions of consent following review of the RtS, unless there are substantial unresolved issues.

Subject to satisfactory resolution of the issues raised in this submission, Council may withdraw its objection to the proposal.

Should you have any further enquiries, please contact Luke Donovan, Executive Assessment Officer on 02 9424 0920.

Yours sincerely,

Shaun Garland  
**Manager Development Assessment Services**

## ATTACHMENT 1

### Ku-ring-gai Council's objection to SSD-73603959, UPA Wahroonga Seniors Housing at 1610, 1614-1634 Pacific Highway and 5 Munderah Street, Wahroonga

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#### A. BUILT FORM CHARACTER

##### 1. Building setback and scale to Munderah Street – Building 6

Part 5, Division 5, Section 97 (2) of SEPP (Housing) 2021 states *“Development consent must not be granted to development for the purposes of seniors housing unless the consent authority is satisfied the design of the seniors housing demonstrates that adequate consideration has been given to the design principles for seniors housing set out in Schedule 8.”*

Council raises concerns with the following aspects of Building 6—

- i. The protruding car parking level with 5 residential levels above on the western side of Building 6. This will effectively present as 6 storeys from Munderah Street and is incongruous with the established 4 to 5 storey scale of residential flat buildings along Munderah Street.
- ii. The proposed 10 metres setback (minimum) to Munderah Street is inadequate to reduce the visual bulk of Building 6 when viewed from Munderah Street. The proposed 10 metres setback to Munderah Street is also inconsistent with the front setback of the existing residential flat buildings at 1-3 and 7 Munderah Avenue which is a minimum of 12 metres on average.
- iii. The proposed height and setback of Building 6 to Munderah Street is inconsistent and incompatible with the existing residential flat buildings that front Munderah Street. The design of Building 6 therefore fails to maintain an appropriate residential character and is inconsistent with Cl.1 (d) (i), (ii) and (iii) ‘Neighbourhood amenity and streetscape’ in Schedule 8 of SEPP (Housing) 2021 –
  - (d) *to maintain reasonable neighbourhood amenity and appropriate residential character by—*
    - (i) *providing building setbacks to reduce bulk and overshadowing, and*
    - (ii) *using building form and siting that relates to the site's land form, and*
    - (iii) *adopting building heights at the street frontage that are compatible in scale with adjacent buildings,*
- iv. The entry foyer does not face Munderah Street, instead turning its back on the street to face the inside of the site, creating inconsistency in the streetscape.
- v. Consideration should be given to how Building 6 can better address Munderah Street, for example inclusion of an entry lobby facing the street and sinking the basement to relate the ground floor and its entry to the street.



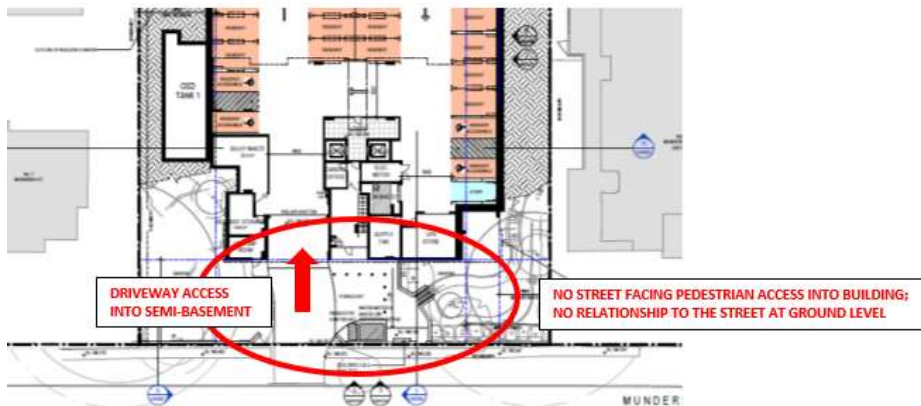
**Figure 1 - Extract from the south elevation of Building 6 fronting Munderah Street, area of concern heightened in red**



**Figure 2 - Extract from the Visual Impact Assessment submitted with the SSD – View 1**



**Figure 3 – Extract from Ground Floor Plan of Building 6 indicating pedestrian access from the rear of the building**



**Figure 4 – Extract from Part Basement Level, indicating address of Building 6 to Munderah Street**

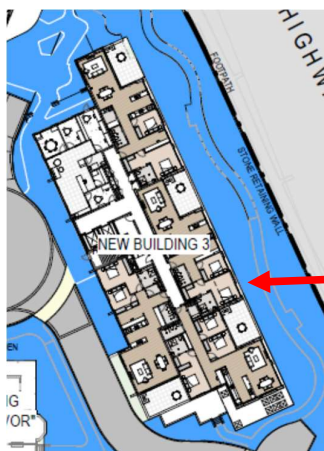
## **2. Lack of articulation to Building 3 – fronting Pacific Highway**

The north-eastern elevation of Building 3 is particularly long with only minimal recessed elements by way of winter gardens and window reveals. There is a strong vertical presence with Building 3, which is accentuated by the limited stepping back at the upper levels. The design of Building 3 should consider greater building articulation particularly in the way it presents to Pacific Highway to ensure a built form outcome that better respects the existing built form character along this section of Pacific Highway and to ensure consistency with Cl.1 (b) and (d) 'Built form and scale' of Schedule 8 of SEPP (Housing) 2021. This could be achieved through splitting this building into two and providing different modulation and finish treatments to that of Buildings 1 and 2 and provision of upper level built form step backs.





**Figure 5 – Extract from photomontages looking north-west up Pacific Highway towards Buildings 4 and 3**



**BUILDING 3 HAS AN EXCESSIVELY LONG FAÇADE WITH LIMITED MODULATION TO REDUCE THE BULK, SCALE AND MASS OF THE BUILT FORM  
THE BUILDING WILL PRESENT IN A SIMILAR MANNER TO THE EXISTING REDLEAF BUILDING EXCEPT MORE IMPOSING DUE TO ITS DOUBLED HEIGHT**



**Figure 6A and B – Extract from Pacific Highway elevation/floor plan of Building 6**

## **B. INTERNAL AND EXTERNAL AMENITY IMPACTS (INCLUDING ENVIRONMENTAL)**

### **1. Overshadowing to northern apartments – 1-3 Munderah Street**

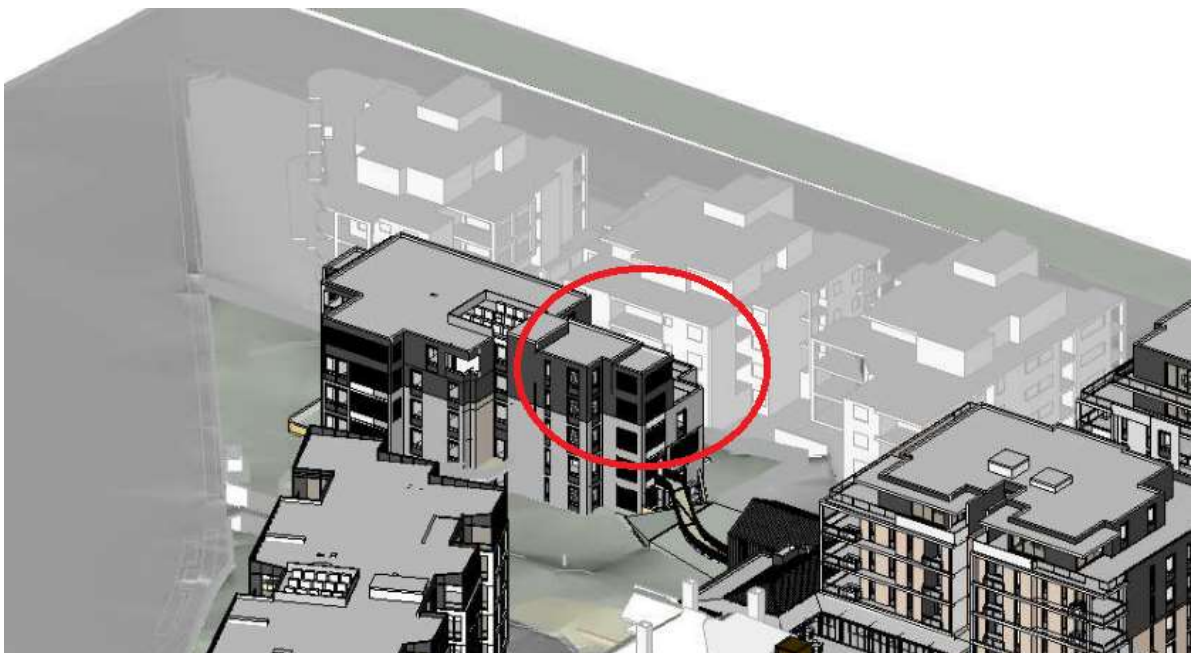
Council raises concerns with the overshadowing of the private open spaces of Block B within the adjoining development to the south at 1-3 Munderah Street. A review of the shadow diagrams would indicate that several of the private open space (balconies) of the northern units (Levels 1 and 2) of Block B within the adjoining development at 1-3 Munderah Street would not receive the required 2 hours of solar access between 9am and 3pm on 21 June (mid-winter) and therefore would be adversely impacted by the proposed development. This is inconsistent with the requirements of Cl.3(a) of Schedule 8 of SEPP (Housing) 2021 which states as follows:

### **3 Solar access and design for climate**

*The design of seniors housing should—*

- (a) for development involving the erection of a new building—provide residents of the building with adequate daylight in a way that does not adversely impact the amount of daylight in neighbouring buildings,*

This impact on solar access to the neighbouring property is largely due to the design and siting of proposed Building B.



**Figure 7 - An extract from the 1.45pm sun eye diagram. The area of concern is the northern balconies to the apartments within Block B of 1-3 Munderah Street**

## 2. Overlooking – 1-3 Munderah Street - - Building 5

The top level eastern terrace (Level 6) to Building 5 is only 6 metres from the eastern boundary. A 9 metres setback is required under the ADG. The design of this terrace will not maintain visual privacy with the rear of Block C within the adjoining development at 1-3 Munderah Street.

## 3. Solar access – Building 3

The north-western corner apartments on Levels 4 and 5 of Building 3, particularly the private open spaces (balconies) which are recessed behind the north-western bedrooms, will not receive the required 2 hours of solar access on 21 June between 9am and 3pm, contrary to the subsection (2)(g) of Section 108 of SEPP (Housing) 2022.

## 4. Building separation – Buildings 1 and 2

Council raises concerns regarding the non-compliant building separation between apartments within Buildings 1 and 2. Council does not agree that the windows to the living rooms and bedrooms are appropriately offset/angled to avoid visual privacy impacts. The area of concern is illustrated in the following extract. This occurs at all levels of the buildings, within this corner of the buildings.



**Figure 8- Extract from Level 3 plan (as an example) of the non-compliant building separation and potential privacy impacts between apartments**

## 5. Building setbacks and footprints

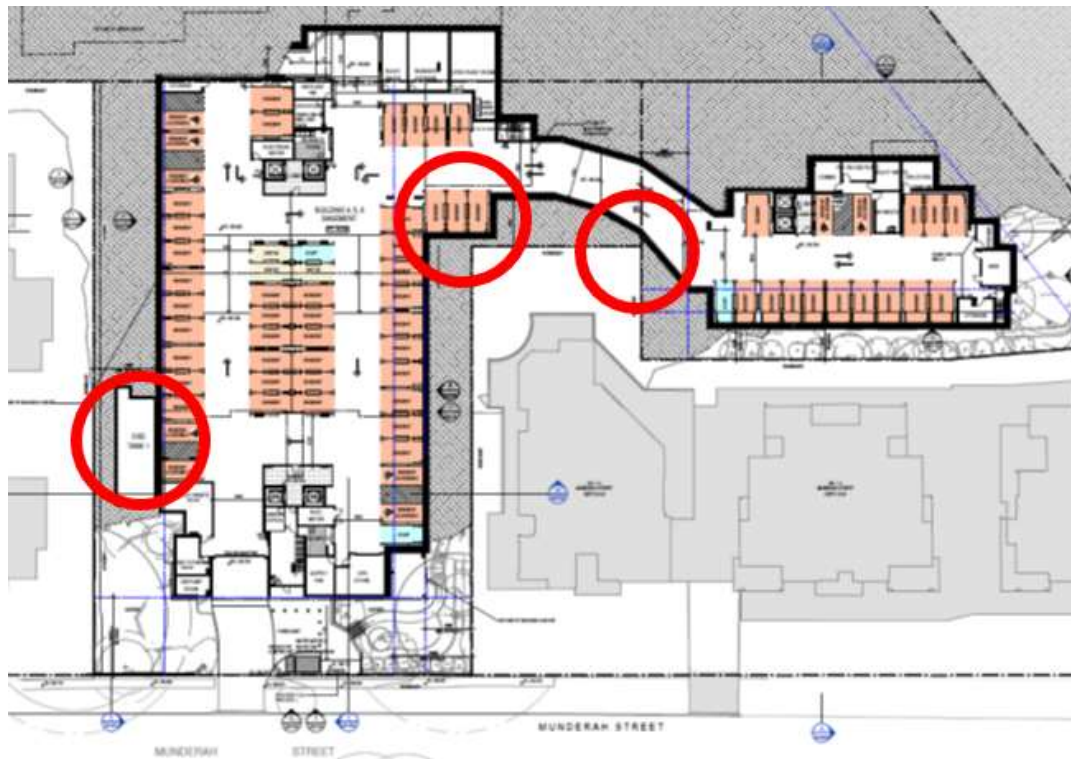
Council raises concerns with the proximity of basement excavation to the boundary line, circled in **Figures 9, 10A and 10B** below. Specific concerns are raised regarding the proximity of basement excavation to areas mapped as having biodiversity value (also circled in Figures below). In Council's opinion –

- The basement should sit directly under the building line to allow sufficient deep soil that can support tall tree planting in the side setbacks capable of buffering visual impacts to adjacent



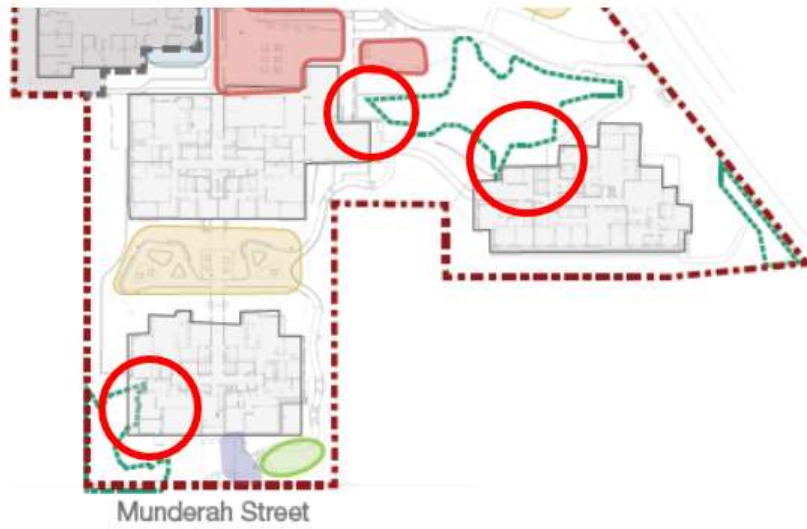
properties, particularly given the bulk and scale of this development when compared to the neighbouring developments.

- The OSD tank to the west of Building 6 is to be placed directly under the building footprint within the basement area.
- Consideration should be given to provision of a partial extra basement level to accommodate the subterranean works within the building footprint.
- It is unclear how the building footprint and landscape design protect the Biodiversity Protection area at the front setback. The building footprint appears to sit on top of the northern portion of the mapped area.
- The building front and side setbacks are to be increased to avoid overlap and impacts to the mapped Biodiversity Protection area. Pathways and hard stands are to be avoided within the mapped area.
- The 6 metres wide ramp/underground passage connecting Building 6 and Building 4 carpark is not supported. It is understood that access into the basement of Building 4 is difficult, however, the width of the connecting underground roadway should be reduced to a single lane width utilising traffic signals to control directional movement. This will reduce excavation close to the boundary line and biodiversity areas.



**Figure 9 – Extract from Basement Plan indicating the areas of the basement that are of concern to Council**



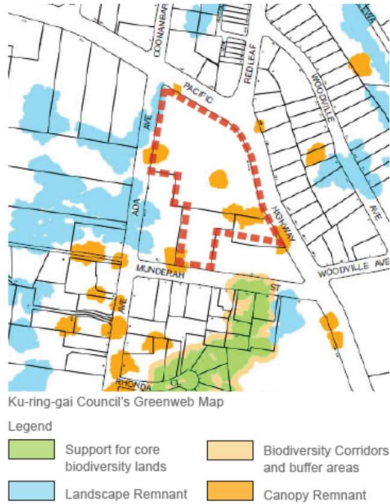


#### Biodiversity Areas

There are three biodiversity areas that have been mapped on the NSW Government Biodiversity Values Map and are also present on Ku-ring-gai Council's Greenweb Map.

The vegetation in these biodiversity protection areas form part of the BC Act listed Critically Endangered Ecological Community (CEEC) Blue Gum High Forest in the Sydney Basin Bioregion.

No works are to occur in these areas except rehabilitation works as outlined in the VMP prepared for the site.



NSW Government Biodiversity Values Map

**Figures 10A, B and C – Extracts indicating relationship of Buildings to Biodiversity Mapped Areas**

#### 6. Subterranean condition of ILUs

Council raises concerns regarding the subterranean conditions of several apartments, particularly those ground floor apartments fronting Pacific Highway in Building B.

#### C. GROSS FLOOR AREA (GFA)

The Department should confirm GFA and Floor Space Ratio having regard to the definition in Section 82 of SEPP (Housing) 2021. Areas to check include –

- parking spaces in excess of 1 space per dwelling, noting excess parking numbers (see (b) of Section 82 of SEPP (Housing));
- whether storage areas that are excluded are “ancillary storage spaces”, particularly those within Building 5;
- screening to a number of the balconies, particularly to north-western side (Level 2) of Building 5 and
- 1.8 metres high screening to balcony southern side of Carise Building (Level 1).

#### D. CAR PARKING REQUIREMENTS

Council's Traffic Engineer has reviewed the application and provides the following comments with respect to the proposed number of car parking spaces within the development -

SEARs requirements include (emphasis added):

*Proposals to promote sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, **minimising car parking provision, encouraging car share and public transport**, providing adequate bicycle parking and high-quality end-of-trip facilities, and implementing a Green Travel Plan.*

Section 7.4 provides a summary of the minimum parking requirements according to the Ku-ring-gai DCP,

LEP and the SEPP:

**Table 5: Car Parking Requirements Summary**

Use	DCP		LEP		SEPP	
	Rate	Req.	Rate	Req.	Rate	Req.
ILU	2 spaces per 3 self-contained units plus 1 visitor space for every 5 units.	114	NA	0	At least 1 car space per 5 dwellings.	27
RCF	NA	0	NA	0	At least 1 parking space for every 15 RCF beds and at least 1 parking space for every 2 employees who are on duty at the same time.	14
<b>Total</b>	<b>114</b>		<b>0</b>		<b>41</b>	

Despite a minimum DCP requirement of 114 car parking spaces for the Independent Living Unit (ILU) component, the applicant is proposing to provide 159 car parking spaces, even though sections 5.4 and 5.5 of the Transport and Accessibility Impact Assessment allude to good accessibility to trains and buses. Section 7.6 (Summary of Proposed Parking Provision) notes that the proposed parking provision is considered an acceptable outcome partly because of 2021 ABS household vehicle ownership analysis for Ku-ring-gai which suggests that 41.1% of households within the Ku-ring-gai local government area own 2 or more motor vehicles, which is significantly higher than the Greater Sydney average of 31%.

However, such relatively high car ownership across the entire LGA is partly a function of location/accessibility, with large parts of Ku-ring-gai not located close to reliable public transport and amenities. Given this site is located close to public transport and amenities, reliance on motor vehicles is reduced. Therefore, using vehicle ownership data from ABS Census Statistical Areas near the site would be a better guide to future parking provision.

<b>Vehicle ownership per household - 2021 Census</b>						
SA1 Location	Location	approx address	Comment	Number of vehicles per household		
				0	1	2+
12103141241	Wahroonga	Pacific Hwy, Ada Ave, Munderah St	includes existing site and high density residential apartments	8%	65%	27%
12103141223	Wahroonga	Pacific Hwy, Redleaf Ave, railway line, M1 Motorway	includes high density residential apartments	9%	57%	34%
		<b>Average</b>		<b>8%</b>	<b>61%</b>	<b>31%</b>

If the car parking allocation is proportioned as above, then approximately 11 ILUs could be provided without car parking (supplemented by on-site car share vehicles), 81 ILUs could be provided with 1 space and 41 ILUs could be provided with 1.5 spaces, for a total 142 car parking spaces.

This is still high considering surveys of the Anglicare Rohini Village Turrumurra ILUs in 2022 indicate that 58% of the respondents never drive or drive a few times a year, and residents are attracted to this facility because of the proximity to public transport. This suggests that provision for car parking for this proposal should be reduced. In terms of vehicle ownership in the statistical area of the Anglicare Rohini Village, the 2021 ABS Census data shows the following:

Vehicle ownership per household - 2021 Census						
				Number of vehicles per household		
SA1 Location	Location	approx address	Comment	0	1	2+
12103141122	Turrumurra	Pacific Hwy, Rohini St, Eastern Rd, St James Lane	includes existing ILUs and high-density residential apartments	31%	55%	14%

If the car parking allocation is proportioned as above, then approximately 40 ILUs could be provided without car parking (supplemented by on-site car share vehicles), 73 ILUs could be provided with 1 space and 19 ILUs could be provided with 2 spaces, for a total 111 car parking spaces. This suggests the DCP requirement for 114 car parking spaces is more reasonable and aligned with car usage of surrounding ILUs.

#### E. BICYCLE PARKING REQUIREMENTS

Section 7.9 of the Transport and Accessibility Impact Assessment notes that no new bicycle parking facilities are provided and that if DPHI request staff/visitor bicycle parking spaces be provided, there is ample area within the site to accommodate appropriate provision. Council recommends that separate bicycle parking be provided for visitors and staff in accordance with the provisions in AS2890.3

#### F. CONSTRUCTION TRAFFIC MANAGEMENT PLAN

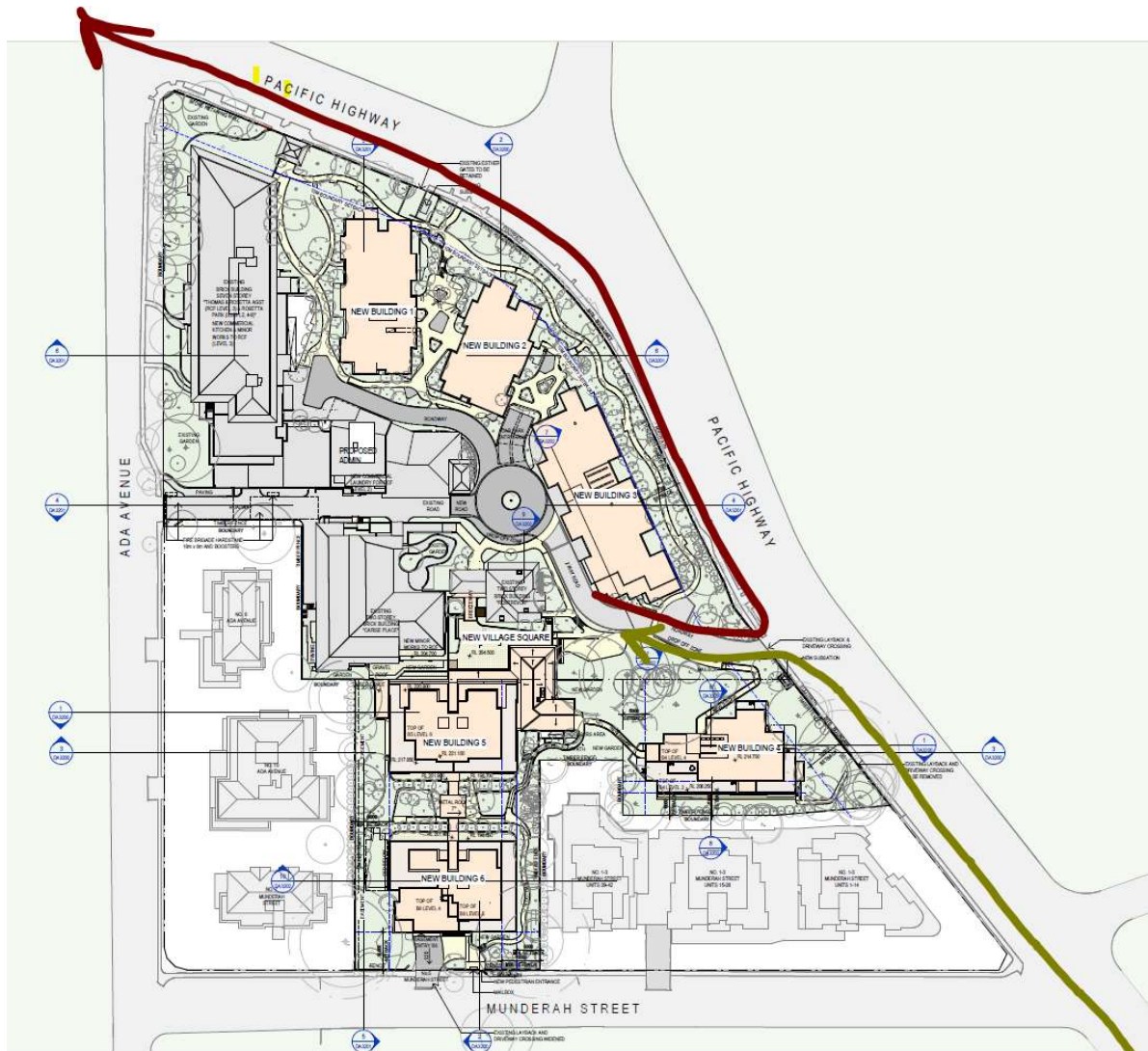
The submitted Construction Traffic and Pedestrian Management Plan proposes the following construction vehicle access routes:





**Figure 11: Truck routes as proposed by the applicant**

In order to protect the amenity of residents in Ada Avenue and Munderah Street and to minimise heavy vehicle activity around the Abbotsleigh Senior School frontage on Ada Avenue, it is requested that temporary construction access be provided on Pacific Highway frontage at the existing layback crossing and gate (see **Figure 12**). Vehicles exiting this construction will turn left onto Pacific Highway to head either further north, or to travel south (via NorthConnex).



**Figure 12: Council's preferred construction access/egress (first preference)**

If this cannot be achieved, it is requested that for vehicles exiting the Munderah Street construction access point be required to turn left into Munderah Street and left onto Pacific Highway (see **Figure 13**), rather than access Pacific Highway via Ada Avenue to head either further north, or to travel south via NorthConnex. This will help to protect the amenity of residents in Ada Avenue and Munderah Street, as well as avoid heavy vehicle activity in front of Abbotsleigh Senior School:



and may also be located on the roof.

It is recommended that an updated acoustic report considers and assesses all noise impacts from all proposed locations, including the roof, given this is an identified location for housing of air conditioning units.

#### H. HERITAGE (INDIGENOUS)

Council notes that a response from the Metropolitan Land Council (Metro LALC) was not received. Council recommends that a short, simple language, respectful follow up email be sent to the appropriate person by name in Metro LALC (attaching the first email and details of the AHIMS search). In addition, Council recommends the proponent make the necessary phone calls to build the relationship and demonstrate a rigour of effort to connect with this body and to obtain their input. Confirmation of the above is required to ensure due diligence has been conducted on statutory matters regarding Aboriginal Cultural Heritage. In addition, there needs to be a commitment that should anything of significance be discovered during the works, that they be reported and appropriately treated.

#### I. HERITAGE (NON-INDIGENOUS)

##### Heritage listing

Part of the subject property is listed on the State Heritage Inventory – see table below.

SHI reference	Address	Item
1880111	1614-1634 Pacific Highway	Gateposts to the former Estha - dwelling house
1880111	1614 Pacific Highway	Rostrevor

The northern section of the property is also listed as a heritage item in Schedule 5 Part 1 of the KLEP 2015.

Ref	Address	Item	Ranking
1976	1614-1634 Pacific Highway	Gateposts to the former Estha, dwelling house	Local

The property is in the vicinity of the following heritage items:

- 28-30 Woodville Avenue
- 1565 Pacific Highway
- 1551 Pacific Highway

The property is in the vicinity of the following Heritage Conservation Area:

- C2 - Heydon Avenue, Warrawee and Woodville

##### Significance

The Statement of Significance for the item is as follows:

*Two storey Federation house in face brick with hipped and gabled terracotta tile roof and high brick chimneys with stepped cappings. Two storey, wrap-around, timber verandah to the northeast with hipped terracotta tile roof on turned timber posts and timber balustrade at the first floor and lattice valance and decorated timber valance brackets. Second verandah/porch to the south with stone steps to the garden*

*Projecting gable to the front with faceted bay window. Single storey hipped roof wing to the rear. Double hung sash windows some full height with solid lower panels.*

*High quality interiors with rooms off a central stair hall with arched openings. Timber floors,*



*plastered masonry walls with moulded timber skirtings. Plaster and lath ceilings with decorated cornices and roses. Polished timber stair with turned newel posts and balusters. High waisted, five panel doors in polished timber with glazed fanlights. Marble fireplaces with cast iron inserts. Partly altered and modernized internally.*

Council's Heritage Advisor has reviewed the proposed development and has raised the following concerns:

### **Ku-ring-gai Development Control Plan**

#### **19D.3 Gardens and landscaping**

Control 2 states that new gardens should be horticulturally and stylistically sympathetic to the period of the Heritage Item. The use of similar materials such as sandstone, brick and gravel is encouraged.

The proposed planting adjacent to and within the immediate vicinity of the heritage item 'Rostrevor' is very limited and is not sufficiently detailed. There is design opportunity to provide landscape amenity and ornamental tree planting within the immediate vicinity of Rostrevor to soften the visual impact of the proposed surrounding residential flat buildings. Proposed plantings should include a predominance of exotic ornamental species consistent with the architectural era of Rostrevor.

### **J. LANDSCAPE ASSESSMENT**

Council's Senior Landscape Assessment Officer has reviewed the proposed development and has raised the following concerns:

#### **SEPP (Sustainable Building: BASIX) 2022**

BASIX Certificate 1377483M\_03 dated 13/01/25 is submitted. The development proposal is inconsistent with the certificate in the following areas:

- Common lawn area. The proposal does not include 6323sqm of common lawn area.
- Common garden area. The proposal includes extensive common areas of garden, whereas the certificate proposes 0sqm of common garden.
- Units 4G.02, 4G.04 include areas of private garden and lawn which is not depicted within the description of project tables

NOTE: Areas of garden and lawn have differing water use needs, and therefore are separate entities as per the BASIX requirements.

An amended certificate consistent with the proposal is required.

#### **SEPP (Housing) 2021 Part 5 – Housing for seniors and people with a disability**

##### **Schedule 8 – Design principles for seniors housing**

##### ***Section 1 - Neighbourhood amenity and streetscape***

***(f) to include plants reasonably similar to other plants in the street***

The proposal does not satisfy this design principle for the following reasons:

- Planting of native tree species along the Pacific Highway site frontage does not reflect the established landscape character which includes exotic deciduous canopy/tall tree species. There is design opportunity to include exotic canopy tree species that reflect the broader established landscape character.
- The planting of a predominantly native landscape aesthetic along the public domain to the Pacific Highway does not reflect the established urban landscape character, which has a predominance of exotic species reflective of the urban development within the suburb. There is design opportunity to increase exotic plant species to reflect the established landscape character.

Further, the submitted Landscape plans fail to provide sufficient detail to ensure neighbour amenity is maintained and enhanced with the increase of built density proposed. Planting plans do not detail understorey plantings and do not provide pot sizing at planting.

*(g) to retain, wherever reasonable, significant trees*

The proposal does not satisfy this design principle. The removal of the following trees is not an acceptable landscape outcome:

**Tree: 89 Liquidambar styraciflua (Sweet Gum)** a mature specimen located adjacent to the southern site boundary. The tree is approximately 26 metres tall, in good health and condition, with no structural defects and a long-life expectancy. The tree is assessed as having high significance and high retention value.

Tree 89 provides valuable amenity between an existing high density residential flat building and the development site. Being a deciduous species, the tree provides valuable summer shade and winter sun. The species is consistent with the established landscape character of the location.

Due to its large dimensions, design amendment is required to enable its viable retention with increased development setbacks.

**Tree: 157 Cedrus deodar (Himalayan Cedar)** located within the Munderah Avenue site frontage. The tree is in good health and condition with no structural defects, approximately 16 metres tall, and assessed as having high significance and high retention value.

Tree 157 provides valuable amenity to the established streetscape and in turn will provide valuable amenity to the increased development scale if retained.

The viable retention of tree 157 requires design amendment to the proposed large forecourt area and the location of the retaining wall and steps. The retention of tree 157 does not impact the building footprint.

**Trees: 209, 210, 211 Liquidambar styraciflua (Sweet Gum)** located within an existing and proposed landscape area between the existing Rosetta Park Building and the proposed Building 1. The trees are assessed as having high significance and high amenity value. The trees are in good health and condition, with no structural defects. The species reflects the established landscape character providing valuable amenity within the site and can be viewed from the public domain. There is design opportunity to viably retain these trees.

It is requested Trees 89, 157, 209, 210 and 211 be viably retained.

## **Ku-ring-gai Development Control Plan**

### Part 7A.6 Deep soil landscaping

The site area is 21,910m<sup>2</sup>. Control 1 of Part 7A.6 requires 50% of the site area to be provided as deep soil area (10,995m<sup>2</sup> in this instance). The proposal does not appear to meet this requirement.

Control 2 of Part 7A.6 requires deep soil zones are to be configured to retain healthy and significant trees on the site and adjoining sites. The proposal does not comply with this requirement as the removal of Trees 89, 157, 209, 210 and 211 is not acceptable.

Control 5 of Part 7A.6 states that driveways are not to dominate the street setback area. Deep soil landscaping areas in the street setback are to be maximised. The proposal does not satisfy this requirement. The proposed driveway and adjacent expansive forecourt area within the Munderah Avenue site frontage forward of Building 6 results in a visually dominant expanse.

Control 7 of Part 7A.6 states that lots are to support a minimum number of tall trees capable of attaining a mature height of at least 18 metres on shale transitional soils or 15 metres on sandstone derived soils. The proposal is required to support 73 canopy trees. Plant quantities have not been specified within the plant schedule and therefore it cannot be accurately determined whether the proposal is consistent with the

minimum tree replenishment planting requirements.

It is unlikely that the proposal is consistent with the DCP requirement. The site can accommodate minimum tree replenishment outcomes.

Control 9 of Part 7A.6 states that trees are to be planted within all setback areas. At least 30% of the required number of tall trees are to be planted within the front setback. The proposal does not satisfy this requirement, noting that the proposal is unlikely to accommodate 30% (22) tall trees within the site frontages.

#### Part 21.2 Landscape Design

The landscape plan is not acceptable due to the following:

- The native planting aesthetic is inconsistent with the established landscape character.
- Tree replenishment planting requirements have not been satisfied.
- There is insufficient planting proposed immediately adjacent to and surrounding the heritage item 'Rostrevor'.
- The plant schedule is incomplete as no plant quantities or pot sizes have been specified/detailed.
- Nominated tree removal is not an acceptable landscape outcome. The removal of Trees 89, 157, 209, 210 and 211 cannot be supported due to their high significance, good health and high amenity values.

The design for an expansive driveway and forecourt within the Munderah Avenue site frontage results in the visual dominance of the built form and inhibits the ability of the proposal to accommodate tall trees forward of Building 6.

#### Stormwater

The proposal includes the location of OSD Tank 1 within the side setback, which should be otherwise utilised for deep soil landscape area within a side setback. There is design opportunity for the OSD tank to be relocated beneath proposed hard surface treatment areas and outside of development setback areas.