

Response to Submissions and Amendment Report 2

IRT Woonona Seniors Housing Redevelopment

4-6 Popes Road, Woonona

Submitted to Department of Planning, Housing and Infrastructure
on behalf of Illawarra Retirement Trust (IRT) Group

Prepared by Colliers Urban Planning

18 March 2026 | 2250296



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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C. Updated Architectural Response Letter	<i>Calderflower</i>
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G. Updated Bulk Earthworks Plan	<i>Innovis</i>
H. Updated Arboricultural Impact Assessment Report	<i>Allied Tree Consultancy</i>
I. Traffic Response Letter	<i>Stantec</i>
J. Flood and Stormwater Management Response Letter	<i>ACOR Consultants</i>
K. Stormwater Flow Response Letter	<i>Innovis</i>
L. Structural Soundness Letter	<i>Innovis</i>
M. Heritage Response Letter	<i>Weir Phillips Heritage</i>
N. Updated Statement of Heritage Impact	<i>Weir Phillips Heritage</i>
O. Flood Peer Review Letter	<i>Martens</i>
P. Flood Emergency Response Letter	<i>Water Technology</i>
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R. Updated Architectural Plans – 50% Design Development (Church)	<i>BREATHE</i>
S. Updated Clause 4.6 Variation Request – Floor Space Ratio	<i>Colliers Urban Planning</i>

1.0 Introduction

This Response to Submissions (**RTS**) and Amendment Report 2 has been prepared by Colliers Urban Planning on behalf of Illawarra Retirement Trust (**IRT**) (the **Applicant**). This report is the second RtS and Amendment Report submitted to the Department of Planning, Housing and Infrastructure (**DPHI**) in response to the DPHI Request for Further Information (**RFI**) letters dated 4 February 2026 and 25 February 2026. The RFI relates to the State Significant Development Application (**SSDA**) for the redevelopment of an existing seniors housing development at 4-6 Popes Road, Woonona (the **site**) (SSD-73910208).

The SSDA, as exhibited, sought consent for the following description of development:

Redevelopment of the existing IRT Woonona Seniors Housing development, comprising construction of 5 buildings with 98 Independent Living Units, new basement parking and additions to the existing Flametree Residential Care Services.

A summary of the project, as exhibited, is provided in **Section 1.1** below.

Public exhibition of the SSDA occurred for 28 days, from 29 July 2025 to 25 August 2025. A total of 8 submissions were received from government agencies and organisations, while 1 submission was received from a member of the public. The DPHI issued the Applicant a letter on 16 September 2025 detailing their requests for additional information based on their review of the Environmental Impact Statement (**EIS**) documentation and submissions received during the exhibition.

A RtS and Amendment Report was prepared by Colliers Urban Planning dated 9 December 2025, hereby referred to as 'RtS and Amendment Report 1'. It provided an analysis of submissions and key issues, actions taken since public exhibition, the Applicant's response to submissions and key issues, and provides an updated justification of the proposed development. A RFI letter was subsequently issued by DPHI on 4 February 2026, followed by an additional RFI letter following the DPHI's independent peer review of the flood documentation, dated 25 February 2026.

This RtS and Amendment Report 2 comprises a consolidated and detailed response to the matters raised in the recently issued DPHI RFI letters, including responses to additional submissions from Wollongong City Council (Council) and other government agencies. Furthermore, it addresses new changes to the design and provides an updated environmental assessment that concludes the changes do not introduce any new adverse environmental impacts (refer to **Section 4.0**). This report is accompanied by revised technical reports where necessary (refer to the Table of Contents).

1.1 Exhibited Development (SSD-73910208)

SSD-73910208, as exhibited, seeks consent for the redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units (**ILUs**), adaptive reuse of existing church, alterations and additions to existing residential care facility (**RCF**), wellness hub, landscaping and car parking, on land at 4-6 Popes Road, Woonona.

Specifically, the exhibited development sought consent for the following:

- Construction of five (5) seniors housing buildings comprising a total of 98 dwellings:
 - Building A - 16 Independent Living Units
 - Building B - 8 Independent Living Units
 - Building C - 27 Independent Living Units
 - Building D - 32 Independent Living Units
 - Building E - 15 Independent Living Units and Social Wellness Centre
- New basement level and at grade car parking for 182 spaces, internal roads and ancillary infrastructure.
- Additions to the existing Flametree Residential Care Facilities and connection to the basement car park.
- Demolition of internal road networks and existing car parking to be replaced in newly proposed basement.
- Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide cafe and staff amenities.
- Retention of existing Camelia Lodge Independent Living Units.
- Landscaping and vegetation management in the riparian corridor.

- Temporary Vehicle Access from Princes Highway during construction for construction vehicles and to service Flametree through stages of construction.



Figure 1 *Artist's impression of the proposed development (as exhibited)*

Source: Calderflower Architecture

1.2 Response to Submissions and Amendment Report 1 (2025)

Following the public exhibition of SSD-73910208 from 29 July 2025 to 25 August 2025, a RtS and Amendment Report 1 was prepared by Colliers Urban Planning dated 9 December 2025. In response to submissions made by government bodies and agencies, Council, and the community, the following key changes were made:

- Architectural Design Changes:
 - Portion of Building D removed and associated reduction in ILUs within Building D;
 - Introduction of end-of-trip facilities and staff bicycle spaces;
 - Redesigning of the basement;
 - Reconfiguration of the bin rooms;
 - Introduction of additional privacy measures;
 - Updated solar access studies;
 - RCF façade updates; and
 - Reconfiguration of unit layouts;
- Landscape Design Changes:
 - Amended landscaping design along the western boundary of the site;
 - Updated landscaping surrounding Building D;
 - Incorporation of additional levels along the pedestrian ramp; and
 - Inclusion of an Outer Riparian Zone offset plan.

2.0 Actions taken since Exhibition

This section sets out the amendments made to the project, following the RtS and Amendment Report 1, which have been made as a result of ongoing design development and project refinement, and in response to matters raised in the DPHI RFI letters. The actions taken since Exhibition were set out further in RtS and Amendment Report 1.

2.1 Project Amendments

Pursuant to Section 37 of the *Environmental Planning and Assessment Regulation 2021*, an applicant may, at any time before a development application is determined, apply to the consent authority for an amendment to a development application. In order to respond to matters raised in the RFI letters, as well as a result of ongoing design development, a number of amendments to the project are proposed, as detailed below.

2.1.1 Reduction in Basement and Car Parking Provision

As a result of the reduction in dwellings from 98 (as originally exhibited) to 92 (as amended under RtS and Amendment Report 1), a reduction in the size of the basement car parking area is proposed. A comparison between the two basement designs is provided at **Figure 2** and **Figure 3**. The numerical difference between the basement parking distribution is provided at **Table 1**.



Figure 2 Basement Floor Plan (as proposed in RtS and Amendment Report 1)

Source: Calderflower

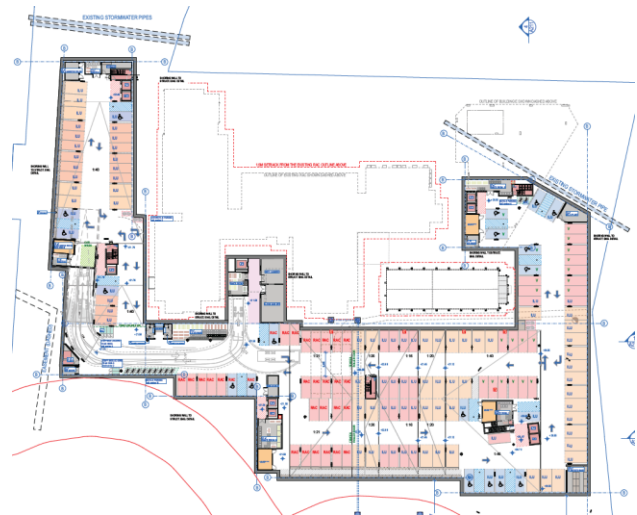


Figure 3 Basement Floor Plan (as amended in RtS and Amendment Report 2)

Table 1 Car parking distribution

Parking type	Submitted Project (as amended in RtS and Amendment Report 1 (2025))	Proposed Amendments in RtS and Amendment Report 2 (2026)	Changes proposed
Basement	172 spaces	145 spaces (92 resident spaces)	-27 spaces
Ground level	4 spaces	10 spaces	+6 spaces
Total	176 spaces	155 spaces	-21 spaces

The reduction in the basement size and in turn, the car parking provision has enabled the proposed development to comply with the development standard relating to resident car parking for ILUs, as set out within Schedule 4(4) of the *State Environmental Planning Policy (Housing) 2021 (Housing SEPP)*. This is summarised in **Table 2** and discussed further in **Section 4.2**.

Table 2 Parking design for resident parking

Parking Design	Proposed ILU resident spaces	Proposed percentage of total provision
Accessible (AS/NZS 2890.6)	14 spaces	15%
3.2m wide	46 spaces	50%
2.4m wide	32 spaces	35%
Total	92 spaces	100%

2.1.2 Reduction in Floor Space

The reduction in the total units and refinements as a result of ongoing design development has resulted in a reduction in total GFA across the site (inclusive of the RCF, ILUs and heritage building) from 19,697m² (as exhibited), to 18,695m² (as amended under RtS and Amendment Report 1), to **18,606m²** (as amended). Further detail is provided in the Updated Architectural Plans at **Appendix B**.

The reduction in floor space is due to both an earlier miscalculation that included plant rooms within the total GFA, which have since been excluded, as well as a release of floor space area to the heritage building, to accommodate outdoor dining areas. As a result, the site’s floor space ratio (FSR) has in turn been revised to **0.64:1**, as discussed further in **Section 4.3**.

2.1.3 Rationalisation of Landscaping

The previous amendments under RtS and Amendment Report 1 sought minor changes to the built form configuration of Building D, to address previous concerns relating to overshadowing to neighbouring properties. This resulted in amendments to remove a portion of the southwestern corner of the building.

This RtS and Amendment Report 2 proposes to rationalise the landscaping approach to reflect the changes to Building D. A visual comparison of the previous landscape plan and the updated landscape plan, with respect to Building D, is provided at **Figure 4** and **Figure 5** below.

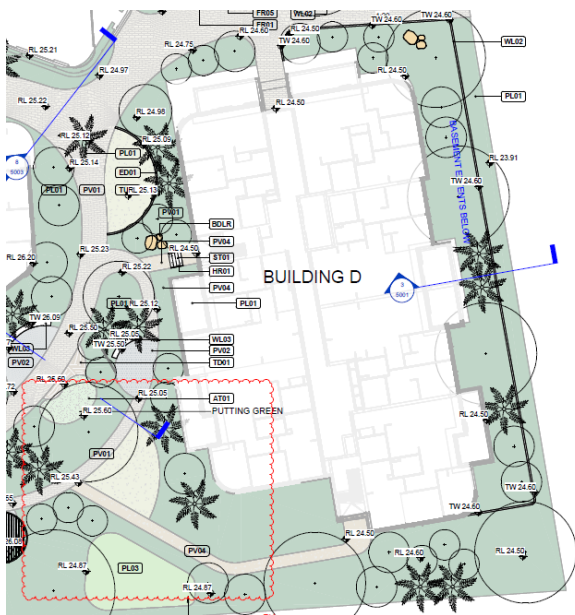


Figure 4 Building D landscape plan (as proposed in previous amendment report)

Source: Arcadia



Figure 5 Building D landscape plan (as now amended)

2.1.4 Redesign of Drainage Channel

The amended scheme proposes a minor redesign of the drainage channel that runs along the northern boundary of the site, between Building E and the neighbouring property. It is noted that the DPH's RFI letter dated 25 February 2026, a 1.2m pipe was recommended in lieu of the proposed diversion channel. As detailed in the Response Letter prepared by Innovis (**Appendix K**), the proposed 1.2m pipe was not deemed appropriate as it would not have sufficient flow capacity to convey the flows.

The proposed amendment therefore seeks to provide a capped stormwater channel, with turf and planting on top, to provide an improved stormwater and visual outcome for the site. A comparison between the previously amended, and proposed landscape plans is provided at **Figure 6** and **Figure 7**, respectively, alongside a visual representation of the channel, provided at **Figure 8**. Refer to **Appendix D** for the full set of updated Landscape Plans. The detailed sections and visualisation of the drainage channel along the eastern boundary of the site is provided in the RtS and Amendment Report 1 (dated 9 December 2025), at Appendix J and Appendix KK.

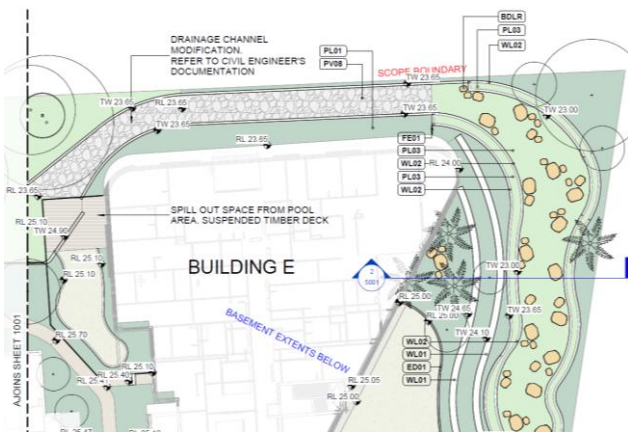


Figure 6 Northern channel landscape plan (as proposed in RtS and Amendment Report 1)

Source: Arcadia

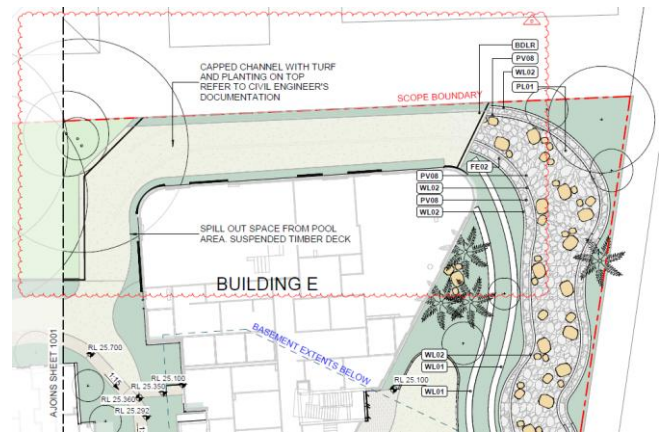


Figure 7 Northern channel landscape plan (as now amended in RtS and Amendment Report 2)



Figure 8 Landscape visual – northern channel

Source: Arcadia

2.2 Revised Proposal Overview

The key project details are outlined in **Table 3** below.

Table 3 Key Project Details

Component	RtS and Amendment 1 (2025) Project	RtS and Amendment 2 (2026) Project
Project Description	<ul style="list-style-type: none"> • Construction of five (5) seniors housing buildings comprising a total of 92 dwellings: <ul style="list-style-type: none"> ○ Building A - 16 Independent Living Units ○ Building B - 8 Independent Living Units ○ Building C - 27 Independent Living Units ○ Building D - 26 Independent Living Units ○ Building E - 15 Independent Living Units and Social Wellness Centre • New basement level and at grade car parking for 176 spaces, 1 at grade ambulance space, internal roads and ancillary infrastructure. • Additions to the existing Flametree Residential Care Facilities and connection to the basement car park. • Demolition of internal road networks and existing car parking to be replaced in newly proposed basement. • Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide cafe and staff amenities. • Retention of existing Camelia Lodge Independent Living Units. • Landscaping and vegetation management in the riparian corridor. • Temporary Vehicle Access from Princes Highway during construction for construction vehicles and to service Flametree through stages of construction. 	<ul style="list-style-type: none"> • Construction of five (5) seniors housing buildings comprising a total of 92 dwellings: <ul style="list-style-type: none"> ○ Building A - 16 Independent Living Units ○ Building B - 8 Independent Living Units ○ Building C - 27 Independent Living Units ○ Building D - 26 Independent Living Units ○ Building E - 15 Independent Living Units and Social Wellness Centre • New basement level and at grade car parking for 176 155 spaces, 1 at grade ambulance space, internal roads and ancillary infrastructure. • Additions to the existing Flametree Residential Care Facilities and connection to the basement car park. • Demolition of internal road networks and existing car parking to be replaced in newly proposed basement. • Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide cafe and staff amenities. • Retention of existing Camelia Lodge Independent Living Units. • Landscaping and vegetation management in the riparian corridor. • Temporary Vehicle Access from Princes Highway during construction for construction vehicles and to service Flametree through stages of construction.
Demolition	Minor demolition of existing parts of buildings and removal of existing hard stand, together with some trees and vegetation on the site.	No change.
Site Area	29,066m ² .	No change.
Gross Floor Area	18,695m ² .	18,606m².
Access	<ul style="list-style-type: none"> • The primary pedestrian access through the site is from the Princes Highway, running east west through the site south of the heritage building. • Vehicle access is from Popes Road, via an internal private road within the site. 	No change.
Car Parking	New basement level and at grade car parking for 178 spaces.	New basement level and at grade car parking for 176 155 spaces.
Tree removal / retention	<ul style="list-style-type: none"> • 35 existing trees retained.* • 83 trees removed.* 	<ul style="list-style-type: none"> • 19 existing trees retained.** • 104 trees proposed for removal.**

* The previous Arboricultural Impact Assessment (AIA) did not include Trees 112-116 in the overall calculations, and therefore the number of trees in the proposed AIA at **Appendix H** of this RtS and Amendment Report includes 123 trees in total.

*** The amended bulk earthworks plan has required greater tree removal in comparison to the plan as exhibited.*

2.3 Revised Project Description

The updated description of development is as follows:

- Construction of five (5) seniors housing buildings comprising a total of 92 dwellings:
 - Building A - 16 Independent Living Units
 - Building B - 8 Independent Living Units
 - Building C - 27 Independent Living Units
 - Building D - 26 Independent Living Units
 - Building E - 15 Independent Living Units and Social Wellness Centre
- New basement level and at grade car parking for **155** spaces, 1 at grade ambulance space, internal roads and ancillary infrastructure.
- Additions to the existing Flametree Residential Care Facilities and connection to the basement car park.
- Demolition of internal road networks and existing car parking to be replaced in newly proposed basement.
- Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide cafe and staff amenities.
- Retention of existing Camelia Lodge Independent Living Units.
- Landscaping and vegetation management in the riparian corridor.
- Temporary Vehicle Access from Princes Highway during construction for construction vehicles and to service Flametree through stages of construction.

3.0 Response to Submissions

Responses to each issue raised in the submissions are provided in this section of the report. IRT request that DPHI consider the responses below, conclude their assessment and provide draft conditions for review.

3.1 Response to DPHI's Key Issues

Table 4 provides a response to the Key Issues letter issued by the DPHI on 04 February 2026. **Table 5** provides a response to the Additional Information Requested letter issued by the DPHI on 25 February 2026.

Table 4 Response to DPHI

Issue Raised	Response
Final version of reports	
The Department notes that several reports submitted with the RtS contain a draft watermark (such as Appendix Z – Heritage Response Letter). The Department requests that these reports are submitted in their final form.	The Heritage Response Letter and Statement of Heritage Impact has been updated to have the draft watermark removed (refer to Appendix M and N , respectively).
Architectural plans	
Appendix B to the RtS does not include all architectural drawings listed on the cover sheet. This includes (but may not be limited to) A330.3 Building C Elevations, A801 Materials, A900 Photomontage. The Department requests that a complete drawing set is submitted.	A complete set of drawings has been provided. Refer to the updated Architectural Plans prepared by Calderflower at Appendix B .
Drawing A702 does not appear to identify the number of units that receive no direct sunlight (less than 15 minutes) mid-winter, as per Objective 4A-1(3) of the Apartment Design Guide (ADG). The Department requests the drawing be revised to include this analysis.	Refer to updated drawing A702 Rev G within the updated Architectural Plans prepared by Calderflower at Appendix B .
Parking	
The Department requests that Drawing A100 at Appendix B be revised to clearly state the number of parking spaces for independent living units (ILUs), the residential care facility (RCF) and visitors. It should also state the number of bicycle parking spaces (both rack and locker types) and motorcycle spaces, and their intended users. The number of ILU parking spaces in tandem form should also be specified.	This information has been provided in the updated Architectural Plans prepared by Calderflower at Appendix B (refer to drawing A100 Rev G).
As per Schedule 4(4) of the <i>State Environmental Planning Policy (Housing) 2021</i> (Housing SEPP), drawing A100 should also clearly state the number of ILU, RCF and visitor parking spaces that are either accessible (AS2890.6) or 3.2m wide.	An assessment against Schedule 4(4) of the Housing SEPP has been undertaken to determine the required accessible car parking provision on site. Drawing A100 has been updated to identify the number of accessible spaces, as well as those 3.2m wide and 2.4m wide (standard). Refer to Appendix B .
	The Addendum Traffic Response Letter has also been prepared by Stantec at Appendix I and confirms compliance with Schedule 4(4) of the Housing SEPP.
	In total, 92 resident car parking spaces are provided for the ILUs at basement level. In accordance with Schedule 4(4), 14 spaces are proposed to be compliant with AS2890.6, which equates to 15% of the total resident car parking provision. An additional 46 spaces have been designed at 3.2m wide, which equates to 50% of the total provision. As such, the scheme is compliant with the standards under Section 2(c) of Schedule 4(4) of the Housing

SEPP. Further, it is confirmed that at least 5% of the visitor parking spaces comply with AS/NZS 2890.6.

The Department requests that Appendix T to the RtS (Traffic Response Letter) address the amended parking provision and related compliance matters.

As noted above, the Addendum Traffic Response Letter prepared by Stantec at **Appendix I** demonstrates that the amended parking arrangement is compliant with the standards concerning accessible car parking spaces for ILUs, as required under Schedule 4(4) of the Housing SEPP. Refer to **Section 4.2.2** for further discussions.

The Traffic Response Letter has also been updated to reflect the reduction in car parking spaces at basement level. Based on a review of the traffic generation previously undertaken as part of the Transport and Impact Assessment alongside the SSDA, the proposed amended scheme results in a net reduction of 1.2 and 2.4 trips in the AM and PM peaks, respectively. As such, the Traffic Response Letter concludes that given the improvement to traffic generation, it is not deemed necessary to undertake further modelling.

Tree removal

The amendment report states that 35 trees are to be retained and 83 trees are to be removed. However, the source of these numbers is not clear, as they do not appear to be coordinated with the bulk earthworks plan (Appendix P), the arboricultural report (Appendix K), the landscape plans (Appendix G) or the Biodiversity Development Assessment Report (Appendix I to the EIS). The landscape plans also include notes stating 'tree to be retained if possible' and the arboricultural report identifies neighbouring trees that will be significantly compromised, which is unclear. The Department requests clarity of the proposed tree removal, tree retention and any impacts to neighbouring trees.

The Landscape Plans (**Appendix D**) and Bulk Earthworks Plan (**Appendix G**) have been updated to remove reference to tree removal, which has been confirmed in the Updated Arboricultural Report at **Appendix H**. This confirms that 19 trees are proposed to be retained (with 3 able to be retained subject to construction mitigation measures).

104 trees are proposed for removal across the site, which is required to facilitate the proposed development footprint.

It is noted that no tree removal is proposed in neighbouring properties. The location of the neighbouring trees is unknown at this stage and has therefore been assumed to be located within the site boundary as a conservative approach, to ensure the protection of these trees. The bulk earthworks plan has been updated to ensure no civil works are proposed within 1.5m of the property boundary to the north, to enable the protection of trees 112-116 (refer to **Appendix G**).

Notwithstanding the above, 208 trees are proposed to be planted in replacement of the trees to be removed, as identified in the updated Landscape Plans at **Appendix D**.

Council and agency review of the RtS

Council have provided a submission on the RtS, and SES, DCCEEW CPHR and DCCEEW Heritage NSW have provided advice on the RtS. These are available at [Seniors Housing – IRT Woonona Redevelopment | Planning Portal - Department of Planning and Environment](#). The Applicant is invited to respond to the issues raised, as the Department will consider Council and agency positions in finalising its assessment of the proposal.

Noted. Refer to the following tables for responses.

Table 5 *Response to DPFI – 25 February 2026*

Issue Raised	Response
Flood and stormwater management	
<p>Wollongong Local Environmental Plan 2009. The Department notes from Section 5 (and associated modelling) of the Flood Report prepared by Acor, dated 26 May 2025 that the proposal is likely to increase flooding impacts upstream of the western boundary. Please investigate and resolve this likelihood of upstream flooding, having regard to clause 5.21 of the</p>	<p>A Response to Submissions Letter has been prepared by ACOR and is provided at Appendix J. It is noted that the flood impact maps were updated and presented in ACOR letter <i>IRT Woonona – SSDA Response</i> dated 4 December 2025, under RtS and Amendment Report 1.</p>

Wollongong LEP which seeks “to avoid adverse or cumulative impacts on flood behaviour and the environment”.

The letter notes that in response to Clause 5.21 of the Wollongong Local Environmental Plan 2009 (**WLEP 2009**), an inspection of the model results shows that increases in water level in the 1% AEP event on 2 Popes Road, upstream of the western boundary, are between 10-43mm and are contained in a localised area of the open channel upstream of the inlet of the culvert under the driveway. These localised impacts are not likely to cause an actionable nuisance and do not have the potential to worsen the use or enjoyment of the land. Flood impacts are not evident upstream of the western boundary for the 20% AEP event, and negligible and localised within the open channel in the 10% and 5% AEP events.

This response has been corroborated by an independent peer review undertaken by Martens and provided at **Appendix O**. The Response to Submissions letter prepared by Martens includes reproduced flood impact maps of the 1% AEP water level afflux and 1% AEP with climate change impacts, to the west of the site, including the maximum water level increases.

The response confirms that the impacts further west are confined to within the open channel. Impacts closer to the site boundary are confined immediately behind a solid brick wall north of the existing fence opening. Further, the letter confirms the existing hazards in this area remain unchanged by the proposed development and will not impact the safe use of the driveway. As such, Martens conclude that the impacts are acceptable.

Diversion of stormwater flow to the north of Building E.

While the Department notes that the proposed stormwater culvert is necessary to divert stormwater around Building E, the Department is concerned with the poor landscape quality, visual appearance and safety of the culvert dominating the northern part of the site which is highly visible from surrounding residences and the Princess Highway. The Department therefore requires design changes (which could take place via condition, if approved) for this culvert to be replaced with 1.2m pipe, with a slight swale feature above with gentle side batters (at 1:4 to facilitate mowing). The Department considers that this change will improve landscape quality, visual appearance and safety.

A Response to Submissions Letter has been prepared by Innovis and provided at **Appendix K**. Innovis explored the alternative suggestion to replace the culvert with a 1.2m pipe, however was found to result in an inadequate carrying capacity. The letter sets out the calculations made to reach the above conclusion. The 1200mm pipe option, as proposed by the Department, has a carrying flow of 5,435.2L/s, whilst the culvert option as proposed by the applicant has a carrying flow of 91,188.6L/s. As such, it is concluded that the culvert has 18 times the flow capacity of the pipe and is not a preferable option.

The proposed amended scheme seeks an enclosed culvert, with a landscaped topsoil and grassed cover that is trafficable. This is deemed to result in a positive landscape outcome for the stormwater infrastructure. A visual representation of this enclosed culvert can be found at **Figure 8**.

A Response to Submissions Letter has also been prepared by ACOR and is provided at **Appendix J**. This confirms that the culvert can be investigated and will require flood model simulations to confirm the size of the box culvert as a condition, if deemed appropriate by the DPHI.

Additional recommended reporting. The Department notes that the Applicant may be preparing an updated Flood Impact Risk Assessment (FIRA) in response to Council's submission to the RtS. The Department requests further updates to the FIRA (which could take place via condition, if approved) to provide the below:

Please refer to responses below.

- a. the 1% AEP post development map (Figures 50 to 52) extent is to be updated to show the entire site

A Response to Submissions Letter has been prepared by ACOR and is provided at **Appendix J**. The 1% AEP post development maps have been updated to include the entire site.

	This response has been corroborated by an independent peer review undertaken by Martens and provided at Appendix O . No further comments are provided.
b. comparison of the 1% AEP pre-development and post-development flood depths/levels and velocity maps reveals differences in flood extent that may be attributed to variations in post-processing methods. To ensure consistency and comparability, all flood maps are to use the same mapping methodology	A Response to Submissions Letter has been prepared by ACOR and is provided at Appendix J . This confirms that the same methodology has been applied, and no further action is deemed necessary. This response has been corroborated by an independent peer review undertaken by Martens and provided at Appendix O . No further comments are provided.
c. the setback from Collins Creek to buildings in the southern portion of the site is to be shown to confirm the minimum 10m requirement is met	A Response to Submissions Letter has been prepared by ACOR and is provided at Appendix J . The setback from Collins Creek to the buildings in the southern portion of the site to show the 10m setback is illustrated on the updated Architectural Drawings prepared by Calderflower (refer to Appendix B). This response has been corroborated by an independent peer review undertaken by Martens and provided at Appendix O . No further comments are provided.
d. flood function and flood risk precinct maps are required to address Council's request for pre and post development flood storage volumes and flood impacts.	A Response to Submissions Letter has been prepared by ACOR and is provided at Appendix J . The letter confirms that flood storage calculations will be undertaken after the completion of flood model simulations for the enclosed channel (culvert). It is agreed that this can be conditioned. The peer review undertaken by Martens (Appendix O) concludes that the culvert is expected to have a negligible effect on site flood characteristics compared to the open channel design. It is noted that updated hydraulic modelling will assess pre- and post-development flood storage volumes and verify that the revised design does not result in material off-site impacts or a loss of site flood storage. It is therefore concluded by Martens that flood function and flood risk precinct mapping is not considered necessary.
Structural soundness. The Department requests a statement from a structural engineer (which could take place via condition, if approved) to confirm that the proposed structures on site can withstand the forces of floodwater, debris & buoyancy up to & including a probable maximum flood (PMF) plus freeboard.	A Response to Submissions Letter has been prepared by Innovis (Appendix L), which confirms that the proposed structures can withstand the forces of floodwater, debris and buoyancy up to and including the flood planning level.

3.2 Response to Government Agencies

This section responds to submissions received from the following local and state government bodies and agencies:

- Wollongong City Council;
- NSW Department of Climate Change, Energy the Environment and Water:
 - Heritage NSW;
 - Conservation Programs, Heritage and Regulation Group; and
- NSW State Emergency Service.

The responses to submissions from each stakeholder are set out in turn below.

3.2.1 Wollongong City Council

Table 6 *Response to Wollongong City Council*

Issue Raised	Response
Building Code of Australia	
The proponent should prepare and submit a National Construction Code Series Compliance Report BCA (Volume1).	A BCA & DDA Capability Statement was lodged at Appendix CC of RtS and Amendment Report 1 (dated 9 December 2025).
Environmental	
<p>Conditions in any approval issued should include:</p> <ul style="list-style-type: none"> • Implementation of sustainable building design measures; • Design of a tanked basement; • A construction environmental management plan; • An erosion and sediment control plan; • A waste management plan; • A construction noise and vibration management plan; • A vegetation management plan; • Restricted hours of work; • Implementation of the recommendations of the biodiversity development assessment report; • Species credit retirement; • Implementation of the recommendations of the detailed site contamination assessment report; • Implementation of the recommendations of the noise impact assessment report; • Discharge of accumulated water during construction; and • Maintenance of water sensitive urban design measures. 	The proposed conditions are acceptable.
Landscape	
The Department should note that the Arborist Report has identified that trees 112-116 are located on the adjoining property and are subject to a major encroachment. Permission must be sought from tree owners for removal of these trees.	The location of the trees 112-116 is currently unknown, but for the purpose of this SSDA, have been assumed to be on the property boundary and retained, as per the Arboricultural Impact Assessment at Appendix H . The bulk earthworks plan has been updated accordingly to provide earthworks at an acceptable distance from, the structural root zone that enable the protection of the trees, included at Appendix G .
Stormwater and Flooding	

- Council is of the view that the proposal will result in the following:
 - Sensitive uses (seniors housing) are proposed within an existing High and Medium Flood Risk Precincts (FRPs) and the Flood Planning Area.
 - Development is proposed within a mapped floodway and High FRP, including realignment of the northern flow path to accommodate Building E.
 - Building over a piped watercourse is proposed, contrary to Chapter E14 WDCP2009 requirements.
 - The Flood Impact Assessment supporting the development should be based on Council's latest adopted flood study (Collins Creek FRMS&P, 2025) to ensure consistency with current policy and data.
 - The proposal includes the redirection of a high hydraulic hazard flow path around a proposed sensitive use.

Please refer to the previous response prepared by ACOR that supplemented the RtS and Amendment Report 1 at Appendix N.

Council is of the view that to redirect a major flow path around a sensitive use such as aged care is not best practice nor consistent with the objectives and controls of both the LEP and DCP, however, this is a matter for the Department to determine in their assessment of the proposal.

DPHI has received independent advice on potential flood risk impacts as part of its assessment in response to the concern of Wollongong City Council and other government agencies. These comments have been addressed in **Table 5** above.

As the determining authority, should the Department support the redirection of the floodway and proposed sensitive use in an area (currently subject to high hydraulic hazard flows), suitable conditions of consent must be implemented.

Community Safety

All footpaths within the plans should be at least 2.5m wide for ease of passing, natural surveillance and perception of safety. Similarly, there should be a subtle clearance of vegetation and trees from all footpaths, to encourage safety and natural surveillance when using the pathways. Safety by design principles should be adopted throughout the development.

A Response to Submissions Letter has been prepared by Arcadia at **Appendix E**. The response confirms that the path network has been designed to ensure hierarchy of paths for ease of wayfinding. Main paths of travel are a minimum 2.5m in width and the main pedestrian spine is approx. 3.5m wide. Egress and courtyard paths are minimum 1.2m wide. The ramp to Popes Road aligns with Australian Standards for a 1:14 ramp.

Health

The proposal should comply with the requirements of the Food Safety Standards and AS-4674/2004: Design, Construction and Fit-Out of Food Premises.

The Applicant accepts a standard condition can be included in the consent if considered appropriate by the DPHI.

Geotechnical

The additional report submitted is considered to build upon the good description of site conditions provided in the previous geotechnical reports undertaken by Soilsrock and demonstrates feasibility of the development from a geotechnical perspective.

Noted. No further action is deemed necessary and the Applicant accepts conditions can be included in the consent if considered appropriate by the DPHI.

It is noted the basement has been redesigned as fully tanked to accommodate the hydrology and flood risk at the site. The single level basement carpark that will extend underneath the entire footprint area of the five new buildings, requiring cut excavation up to approximately 5.9 metres depth.

Amendments to the design are considered insignificant from a geotechnical perspective. The geotechnical report makes appropriate recommendations for the development and it is noted that consideration has been particularly given to the coal seam and high groundwater table conditions present on the site. Geotechnical supervision will be required for management of these conditions and to ensure adequate support is provided during and after construction to protect adjoining development.

Relevant conditions should be included in any future development consent.

Heritage

The applicant has provided: Noted.

- Response to heritage comments prepared by Weir Phillips (Draft).
- Heritage Impact Statement/Letter of Advice prepared by Wier Phillips (Draft).
- Architectural Plans for Restaurant Fit Out.
- Updated ACHAR and Response to Heritage NSW Comments.

It is noted Heritage NSW is the regulatory authority for Aboriginal Heritage under the NSW NPWA and on whether SEARS 19 has been satisfied. Noted.

It is noted the additional heritage documents provided are only in draft form. The Heritage Response Letter and Statement of Heritage Impact have been provided without the draft watermark at **Appendix M** and **Appendix N**, respectively.

View Corridors and Built Form

It is recognised that a number of strategies may be adopted to balance views and built form. The following comments seek to achieve a subtle outcome from a heritage perspective.

The applicant has responded that the existing building to be demolished obscured key views as a justification to Buildings D and E. The significant view corridors are also considered relevant.

The applicant is encouraged to consider improving view lines to the heritage building from the south of Princes Highway by potentially further setting back the north-eastern corner of Building D and increasing the front setback. Viewpoint 11 in the VIA shows the height and scale of Building D impeding all views to the Heritage item including roof forms that were previously visible despite the (now demolished) existing building.

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix C**.

The response notes that the existing and principal view corridors to the former church is from directly in front of it on the Pacific Highway and from the northeast. These views and setting to the church are maintained and enhanced by the proposed landscape works.

Views from the southeast, from the Pacific Highway are currently obscured and blocked by the existing former shop and dwelling, so that no meaningful or clear views of the church are available or expected.

The proposed Building D in this location will maintain similar obscured view corridors to the Church in this location and maintain the existing church setting and presentation from the public domain. Building D has been carefully designed in the context of the Church with a varied palette of materials, colours and restrained architectural detailing to enable able to sit comfortably with but recessive to the contrasting character and style of the Church.

The RFI or HIS does not respond to several key comments regarding built form and key views made in response to DE-2025/70 - see letter prepared by Council dated 25 August 2025. It is unclear why the response is silent on points raised regarding:

- The scale to the ridgeline of the Church Building and retaining views both to the site from the Princes Highway and through the site west to the Illawarra Escarpment.
- Buildings C and D are in close proximity to the Heritage item and will be highly visible from the public domain and impacts on the church building. The argument put forward in the Variation Statement that a reduction in building footprint has retained views to the Escarpment is not supported by the applicant's Visual Impact Analysis.
- The Visual Impact Assessment: Urbain Group June 2025 shows short range views to the Escarpment and Church Building are significantly impacted by the proposed built form arrangement.

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix C**. The letter concludes that the view from the southeastern side of the heritage building is an improvement to the existing location of buildings adjacent to the heritage building on the site. These buildings obscure the church when approaching from the southeast, as shown in plan A340.2, within the updated Architectural Plans prepared by Calderflower and provided at **Appendix B**.

- The height of Buildings D and E shall be more sympathetically designed to step down to the south and north respectively to three stories to better relate to the Heritage item.

Basement Car Parking

The basement car parking plan shows car park and basement construction proposed in close proximity to the Heritage item. The potential construction impacts on the integrity of the Heritage item require careful consideration. Further investigation is required.

A Structural Response Letter was provided at Appendix Q of the RtS and Amendment Report 1, dated 9 December 2025, which confirms that the proposed basement, with a 2m setback from the heritage building, can be designed and constructed without significant structural impacts. Further investigations will be undertaken to determine the heritage building's foundation details as part of the detailed design phase.

Fit Out of the Church Building

Architectural Plans for the café and restaurant fit out have been provided. Based on the plans, a future development application for the fit out of the Church Building (as noted will be required by Weir Philips in the RFI Letter) could be supported. The key impacts to the Church building include:

- Demolition of two windows to be 'reused'.
- Construction of false ceiling and service mezzanine.
- Additional dining pavilions.

The detailed fit out and operation of the heritage item will be subject to a separate approval via a development application at a future stage.

The National Construction Code Report and RFI Letter provided identifies upgrades that will be required to the Church building including widening of openings and fire management solutions. It is recommended that alternative performance solutions are explored and included in detailed plans for the fit out at SSD Stage rather than being conditioned so all heritage impacts can be considered.

The detailed fit out and operation of the heritage item will be subject to a separate approval via a development application at a future stage.

An updated set of the 50% Design Development Architectural Drawings has been provided at **Appendix R** of this RtS and Amendment Report. The plans identify restoration works to the existing church as required.

The Heritage Impact Statement (Draft) dated October 2025 addresses the restaurant fit out, however it does not address Clause 5.10 of the WLEP 2009 or Chapter E11: Heritage Conservation. There appears to be an appendix included separately in the RFI letter which does respond to the E11 controls, however, this is not included in the HIS. It is recommended that the April and October HIS are combined to consider heritage impacts to the site holistically and an assessment against the E11 DCP controls are included addressing the response to VIA assessment and key issue of views from the Princes Highway are not addressed.

The Response to Submissions Letter regarding heritage matters, and the Statement of Heritage Impact have been updated at **Appendix M** and **Appendix N**, respectively. The documentation can be read together and do not require consolidation, as is standard practice for the Response to Submissions process.

As discussed below, the additional information requested such as the Schedule of Conservation Works would address works to the Church building to support a new use, and provide further information on the reuse of existing windows indicated on the plans. Conservation outcomes should be included in the proposal to mitigate significant impacts of the proposed new built form to the Church building.

The Applicant accepts a condition can be included in the consent if considered appropriate by the DPHI.

A historic archaeological assessment was requested in SEARS 20. As previously noted due to the significant excavation that will be required to accommodate the basement car parking, it is recommended that a Preliminary Assessment is undertaken at a minimum to adequately consider the proposed development. It has not been demonstrated there is no historic archaeological potential on the site. Therefore SEARS 20 has not been satisfied in this regard.

The Applicant accepts a condition can be included in the consent if considered appropriate by the DPHI.

The following additional information remains outstanding. Consideration should be given to elements that require assessment vs being conditioned:

1. Historic Archaeological Assessment to satisfy SEARS Condition 20.
2. Schedule of Colours and Materials and Signage Strategy for fit out of Church Building.
3. National Construction Code Report that identifies any upgrades required to the Church Building for the change of use and updated HIS that addresses the potential impacts of the required upgrades. Partially provided, however impacts and performance solutions have not been resolved.
4. Schedule of Conservation Works to be delivered as an outcome of the proposed development to Church Building based on a Condition Report.
5. Schedule of Ongoing Maintenance Works and advice on how this will be implemented in the ongoing operation of the Aged Care Facility.
6. Heritage Interpretation Strategy for whole development site that integrates with the Landscape Concept Plan.
7. Heritage Construction Management Plan and Structural Engineering Plan that considers and mitigates potential basement car parking impacts.

The Applicant accepts conditions can be included to this effect in the consent if considered appropriate by the DPHI.

Architecture / Design

Several previously raised concerns/queries have been provided with adequate modifications, justifications and/or evidence as requested, except for those listed below. Council recognises that design refinement and detail may be addressed via conditions of consent. Elements that require further design resolution may require greater consideration and adjustment.

Noted. Please see responses below.

Insufficient information provided regarding selection and specification of materials. No large-scale details have been provided on architectural drawing A800 Rev F. It should also be noted that architectural drawing A801 Materials as listed on the cover page has not been provided within the architectural drawing package.

A complete set of drawings has been provided. Refer to the updated Architectural Plans at **Appendix B**.

The applicant is encouraged to explore a revised colour palette that incorporates the existing face brickwork to avoid unnecessary paint, render or bagging of brickwork to maintain a low cost and durable finish that requires less ongoing maintenance. The photomontages provided on architectural drawings A900-A902 should also be updated to show the proposed material and colour palette of the RAC to better understand how it integrates with the overall development.

The proposed bagging of existing brickwork has been removed from the application. Refer to A800 Rev G, A300.7 Rev G and A300.8 Rev G within the updated Architectural Plans at **Appendix B**.

The applicant has provided adequate justification for the placement of the basement ramp. As a minimum it is recommended that the applicant should review the landscaping around the base of Building B along the western frontage to minimise the visual impact of the blank wall when viewed from the internal driveway.

A trellis system has been provided to the Building B wall along the driveway frontage, as included in the Landscape Plans at **Appendix D**. Arcadia have confirmed that climbing plants will be planted to grow up the trellis.

The increase of proposed bulk and building width/depth of Buildings C and D remains a concern. The consolidation of Building C into one built form has resulted in a bulky building appearance with dark internalised corridors and convoluted circulation areas that have no access to natural light or ventilation. The perception of bulk and scale has increased. This appears to be a result of filling in the open areas rather than

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix C**. Building C was consolidated into a single more cohesive built form in response to comments from SDRP #2, as noted below: *The separation of Building C into two forms with a narrow breezeway at ground level is currently unconvincing. Explore whether*

redistributing the mass. Consideration should be given to whether an L-shaped configuration, or other alternative, may provide a more appropriate built form outcome than the current triangular wedge arrangement.

The SDRP did not endorse consolidation of the built form as an outcome in itself, but rather requested exploration of whether such an approach could deliver improved amenity outcomes and more usable open space for Building C. The current proposal does not demonstrate that these improved outcomes have been achieved. While a wedge-shaped built form may be acceptable in principle, the resulting building width, depth and internal configuration have produced poor-quality communal areas and common circulation spaces with limited access to natural light and ventilation. These outcomes do not satisfy the relevant amenity objectives of the ADG and do not represent an improvement of the previous scheme. Accordingly, Council maintains its position that the built form of Building C requires further refinement. Alternative massing and layout strategies should be explored to improve building scale, circulation efficiency and internal amenity consistent with SDRP comments.

consolidating the built form will create more usable open space elsewhere and improved outcomes for building C.'

As such, no further action is deemed appropriate.

The proposed rooftop service and plant areas across all buildings are not well integrated into roof designs or overall built forms. They are visually dominant and contribute to the perceived bulk and scale when viewed from surrounding areas, presenting as an additional storey in some instances, breaching the height limit. This is not supported. And Adequate justification has not been provided.

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix C**. The letter notes that the roof plant has been set back from the building edge to reduce the visual impact when viewed from ground level. The plant is enclosed by acoustic screening enhancing amenity for residents and neighbours.

Separate diagrams to support the Clause 4.6 Request showing the height exceedance are provided in the updated Architectural Plans at **Appendix B** (A401.1 Rev B).

Landscape and Outdoor Open Space

Several previously raised concerns/queries have been provided with adequate modifications, justifications and/or evidence as requested, except for those listed below.

Noted. Please see responses below.

The general arrangement landscape plans should be updated to clearly differentiate between new proposed trees and existing trees that are being retained. It should also be noted that wording such as "tree to be retained if possible" is not accepted. A detailed arborist report along with consultant coordination is to clearly determine which exact trees have been identified for retention and TPZs are to be clearly noted and coordinated on all relevant architectural and landscape plans. (This previous comment remains unaddressed.)

This note has been removed from the Landscape Plans, updated and provided at **Appendix D**. An updated Arboricultural Impact Assessment has been updated at **Appendix H**.

There is a lack of separation provided between the south-western end of Building A and the proposed internal road to the west. A more generous area of landscaping is required to provide a sufficient buffer between the habitable areas of the various units and the roadway. Previous comment and concerns remain unaddressed. The applicant's solution to provide a screen fence in the garden area to combat this issue is not accepted. Alternate options should be explored to increase the setback and extent of landscaping between habitable areas and the driveway for ground floor units as a minimum.

A Response to Submissions Letter has been prepared by Arcadia and is provide at **Appendix E**. This confirms that the updated Landscape Plans (drawing 5004) illustrates a section from the driveway to Building A. This shows the clear level difference from the car movements along the driveway, up to the windows at Building A, with screens and planting proposed to block the line of site.

The applicant's response to provide gentle mounding and softer level transitions to reduce visual prominence of the basement ramp below is accepted, however this has not been reflected in the revised landscape plans apart from a general note. Insufficient detail has been provided, and as a minimum, the

As confirmed in the Response to Submissions Letter prepared by Arcadia at **Appendix E**, the updated Landscape Plans include a section over the ramp as requested. Refer to drawing 5004 within the updated Landscape Plans at **Appendix D**.

applicant is expected to provide one or two detailed sections of the area in question to ensure the design intent is fully realised.

Amenity, Safety and Sustainability

Access to natural light in the southern portion of the circulation corridors across all levels of Building D is not provided. There are similar concerns with the lack of natural light and ventilation to circulation corridors and foyer spaces of Building C also. (This previous comment remains unaddressed.)

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix C**.

It is noted that the solar access outcomes for the circulation corridors and foyer spaces are a result of the consolidation of Building C, as requested by the SDRP. This matter was deemed acceptable by the SDRP and preferred over a separated built form, which would have facilitated greater solar access.

Several unit types provide open plan layouts which exceed the maximum 8m room depth requirement as set out in Objective 4D-2 of the ADG. "In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window."

The applicant has responded, stating: "Seniors Housing calls for adaptable housing for all apartments. All apartments in this development are designed to be fully adaptable. The increased spatial requirements needed to achieve a compliance nonetheless provides the desired amenity and meets the objectives within the ADG."

While it is acknowledged that the proposal is for seniors housing and that the apartments are intended to be fully adaptable, this itself does not justify exceeding the maximum 8m habitable room depth specified under Objective 4D-2 of the ADG. It has not been demonstrated how the increased room depths achieve equivalent or superior amenity outcomes, nor has any objective analysis been provided to substantiate the claim that the layouts meet the relevant objectives of the ADG.

Adaptable housing requirements do not necessitate increased habitable room depths beyond the prescribed maximum. Compliant adaptable unit layouts that meet the 8m room depth requirement are commonly achieved across comparable developments. In this instance, the non-compliance appears to arise from the selected layout and internal configuration of the affected unit types, rather than from any inherent constraint associated with adaptability requirements. Accordingly, council maintains its previous position that all unit layouts should satisfy the maximum habitable room depth as outlined in the ADG.

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix C**. It is confirmed that all apartments in this development are designed to be fully adaptable. The increased spatial requirements needed to achieve a compliance nonetheless provides the desired amenity and meets the objectives within the ADG.

The full extent of the basement carpark is unclear on architectural drawing A100, in particular its relationship with the existing RAC building, which should be updated for clarity. On architectural drawing A300.2 it appears that pedestrians accessing the RAC from the basement carpark are required to transverse through the loading, waste and laundry area to access the lifts which is not acceptable and raises concerns in regard to safety and wayfinding, with possible pedestrian and vehicular conflicts, as well as the poor identification and visibility of the lifts from parking areas. (Previously raised and not addressed.)

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix E**. The letter confirms that the basement has been reduced in size and moved further away from the RCF. Drawing A100 shows the outline of a minimum clearance of 1.5m around the RCF building. Drawing A101 has also been updated to show the outline of the basement below. Pedestrians in the basement will make their way to the lift core for Building C and exit the lift at the communal entrance lobby of the Porte cochere. They will then access the entry doors to the RAC via an accessible covered walkway. Suitable wayfinding signage will be incorporated. Refer to updated Architectural Plans at **Appendix B**.

The applicant claims that storage cages have been provided behind car spaces and in storage rooms, however this has not been reflected in the basement plan. The number of storage cages within the basement area does not reflect the number of ILU's within the development.

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix E**. Storage cages are provided in the basement behind car spaces as well as in storage rooms. Notes have been added to the drawing to highlight storage areas. Storage has also been provided at Ground Level of

Building B for additional storage. Refer to the updated Architectural Plans at **Appendix B**.

If waste chutes are being provided, they should discharge into a separate secure waste rooms that are not accessible to residents to avoid potential safety issues. (This previous comment remains unaddressed.)

Waste chutes for Buildings D and E in particular discharge into the basement waste room which houses the recycling and FOGO bins and to which residents will require access. No allowance for these facilities has been provided on the levels above. Ideally a small, dedicated waste room should be considered on each residential level in each building that is well-ventilated and accommodates space for a recycling bin, FOGO receptacle, problem waste receptacle, and access to the garbage chute.

A Response to Submissions Letter has been prepared by Calderflower and is provided at **Appendix E**. Waste chutes have been provided for Buildings C, D & E and discharge into waste rooms where residents cannot access chute area. Refer to the updated Architectural Plans at **Appendix B**.

3.2.2 Department of Climate Change, Energy the Environment and Water

Table 7 *Response to Heritage NSW*

Issue Raised	Response
The responses provided by Colliers International Urban Planning Pty Ltd and Austral Archaeology, November 2025 have adequately addressed comments provided by Heritage NSW on Aboriginal cultural heritage matters related to the above State Significant Development. Heritage NSW does note that correspondence evidence with the Registered Aboriginal Parties (RAPs) in April 2025 (Response #1 by Austral Archaeology) was not included in the revised Aboriginal Cultural Heritage Assessment Report (ACHAR) but all other comments have been adequately addressed. On the basis that the revised documents adequately address prior comments, recommended Draft Conditions of Approval have been provided in Attachment A. With respect to Aboriginal cultural heritage, Heritage NSW has no further comments on the proposal at this time.	Noted. No further action is required.

Table 8 *Response to Conservation Programs, Heritage and Regulation Group*

Issue Raised	Response
Biodiversity	
CPHR recommended that the preparation and implementation of a Vegetation Management Plan (VMP) is to be included as a condition of consent.	Noted. The VMP can be updated as part of a condition of consent to the approval if required by the DPHI.
The proponent has provided a VMP prepared by Biosis dated 20th November 2023. The VMP was lodged with a previous DA for the site (demolition DA consisting of the demolition of several buildings according to the demolition site; DA2023/808). This DA was assessed under Part 4 of the NSW Environmental Planning and Assessment Act 1979 with Wollongong Council as the consent authority. The footprint of this DA is not consistent with the footprint of the proposed SSD – 73910208.	
The detail provided in the VMP in relation to future vegetation management of the site is, however, adequate and will satisfactorily address the requirements of the recommended consent condition.	
Recommendation: - Update heading 1.1 Project Background to describe the current SSD application	Noted. The VMP can be updated as part of a condition of consent to the approval if required by the DPHI.

- Update the VMP area illustrated in Figures 2 and 3 of the VMP to be consistent with the footprint of the current SSD application.
- Revise Management Zones as necessary
- Revise management action schedule and budget as necessary

Flooding

The Flood Impact Risk Assessment maps provided in the initial Flood Report identified adverse flood impacts on Nicholson Road and Collins Creek in the 20% AEP event, and on the Princes Highway from the 10% AEP. The revised report indicates improved PMF levels with reduced impacts on proposed buildings.

Noted. No further action is required.

Recommendation:

- Work with Wollongong City Council on managing its identified flood risk issues on site and consult with NSW SES on the final Flood Emergency Response Plan (FERP).

A Flood Emergency Response Plan has been prepared by Water Technology, which has been updated and provided at **Appendix Q**.

3.2.3 NSW State Emergency Service

Table 9 Response to NSW State Emergency Service

Issue Raised	Response
<p>Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.</p> <p>Any proposed Emergency Management strategy for an area should be compatible with the strategies identified in the NSW State Flood Plan⁴ and the Illawarra (Wollongong) Local Flood Emergency Sub Plan. Evacuation of hospitals and aged care can be complex and is known to be associated with an increased rate of mortality in patients and nursing facility residents. ^{6 7 8} To minimise disruption to essential services, and to reduce the risks associated with evacuation of aged care facilities, the NSW 2022 Flood Inquiry recommends essential services infrastructure is situated as much as possible above the flood planning level and the PMF. The proposal to shelter in place is inconsistent with the NSW Shelter in Place Guidelines and the Flood Risk Management Manual (2023) Principle 9, as the surrounding roads are impacted by high hazard flooding and relates to a sensitive use. Rainfall forecasts have a degree of uncertainty and are not a reliable indication that flooding will occur. Further, the current trigger of 44mm of rain over a 3-hour period⁹ is likely to be a relatively frequent occurrence, and therefore be disruptive, increase complacency and anxiety at best. Please note that NSW SES do not “give all clear”, and therefore this trigger should be removed from any FERP.</p>	<p>A Response to Submissions Letter has been prepared by Water Technology, which has been provided at Appendix P. The Illawarra Flood Emergency Sub Plan (NSW SES, 2023) states that:</p> <p><i>1.6.1 The protection and preservation of human life (including the lives of responders and the community) is the highest priority.</i></p> <p>The proposed development prioritises the protection and preservation of human life. As the driveway and local streets can be subject to hazardous flash flooding with little warning, or in some circumstances potentially with no warning time, the most appropriate flood emergency response strategy for the site is for site occupants to shelter in place in their dwellings beyond the reach of the PMF. This strategy prevents site occupants from coming into contact with hazardous floodwaters.</p> <p>The NSW SES flood plan for the Illawarra also states:</p> <p><i>1.6.2 Evacuation is the primary response strategy for people impacted by flooding.</i></p> <p>However, given the potential for flash flooding in the local streets evacuation is not suitable as a primary flood emergency response strategy for the site as it would require site occupants to evacuate into potentially flooded streets. This would not be conducive to the protection and preservation of human life and would place site occupants at unnecessary risk. This is also the case for many sites within the Wollongong LGA. Therefore, evacuation of the development and the aged care facility is not proposed.</p> <p>All habitable floor levels would be above the PMF level and all buildings subject to the SSDA would be accessible from one another via flood-free routes in the PMF. Therefore, the proposed shelter in place strategy aligns with the relevant controls in the DCP.</p> <p>The FERP has been updated to remove the trigger based on the NSW SES issuing an “all clear”, as included at Appendix Q.</p>

Principle 2 Decisions should be informed by understanding the full range of risks to the community.

Decisions relating to future development should be risk-based and ensure Emergency Management risks to the community of the full range of floods are effectively understood and managed.

Further, risk assessment should consider the full range of flooding, including events up to the Probable Maximum Flood (PMF) and not focus only on the 1% AEP flood. Climate change should also be considered.

The site is identified as a High and Medium Flood Risk Precinct, with hydraulic hazards up to H5. It is noted that the site itself is partially prone to flooding from the stormwater channel to the north and Collins Creek to the south, in both the pre and post development conditions. Flooding and isolation occur at least as frequently as the 20% AEP (likely more frequent because of climate change), with hydraulic hazards reaching H5 and H6 in sections of the site. This is unsafe for people, vehicles and buildings may be subject to structural damage.

The time to onset of flooding is as little as 15 minutes, however duration of potential isolation is anticipated to be less than 6 hours¹¹. We recommend undertaking longer duration flood events to confirm the potential maximum duration of isolation. Historical events often have longer time of isolation than design events due to them often being caused by east coast lows that can be more prolonged.

Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES.

Principle 4 Decisions on development within the floodplain does not increase risk to life from flooding.

Managing flood risks associated with flooding requires careful consideration of development type, likely users, and their ability respond to minimise their risks. This includes consideration of:

- **Isolation** – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- **Secondary risks** – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- **Consideration of human behaviour** – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

The response to submissions is contradictory, particularly in relation to Appendix A Compliance Assessment relating to the Wollongong Local Environmental Plan 2009 (LEP). It is evident that the proposal does not maintain existing flow patterns and overland flow function (5.21(2)(a)), flood mapping has not been produced to indicate no adverse impacts are observed offsite up to the PMF (5.21(2)(b) and 5.21(1)(c)), the proposed shelter in

The Response to Submissions Letter prepared by Water Technology (**Appendix P**) notes that the full range of risk to life up to and including the PMF has been considered in the FERP, updated and provided at **Appendix Q**. Whilst it is noted that the site can be isolated by H1 floodwaters in the 20% AEP flood, occupants of the buildings would not be exposed to hydraulic hazards of H5 or H6 in an event of any magnitude. The primary flood emergency response strategy for the occupants is to shelter within their dwellings or to access the Wellness Centre, which would be accessible from all new ILUs via pathways sited above the PMF level.

A requirement of the FERP is that the buildings will need to remain stable when subject to the forces associated with flooding in a PMF. A Design Intent Statement, outlining the structural design requirements for PMF floodwaters in relation to Buildings A, B, and E, is provided at Appendix E of the FERP.

IRT has acknowledged the NSW SES's recommendation that longer duration events be modelled. It should be noted that all flood-related RFIs have been addressed. Should DPHI require any further clarification, including further flood modelling, these matters could be incorporated as conditions of consent.

The Response to Submissions Letter prepared by Water Technology (**Appendix P**) notes that the primary flood emergency response strategy for the proposed development is to shelter in place using on-site resources. It is concluded that the implementation of the strategy does not require external resources, does not rely on the possibility of mass rescue and does not impact the ability of the existing community to evacuate or refuge in response to a flood.

A Response to Submissions Letter has been prepared by Water Technology to respond to Principle 4, which has been provided at **Appendix P**.

- **Isolation** - Section 2.3.3 of the FERP demonstrates that the site could be isolated for up to approximately 2 hours from the commencement of rainfall in a 90-minute duration PMF. This is significantly below the 12-hour maximum set out in the NSW DPHI's Shelter in Place Guideline for Flash Flooding. Although a longer duration PMF may result in a longer duration of isolation, longer duration events would also have lower flood levels and hydraulic hazard and therefore it is not anticipated that during a longer duration event site isolation would exceed 12 hours from the start of rainfall.
- **Secondary risks** - Should a fire occur during a flood all occupants of the buildings would be able to exit their buildings directly to land above the PMF level. In particular, the north-eastern corner of the site to the east of Buildings E (the Wellness Centre) and the refurbished Blue Gum Sanctuary would remain flood-free and would be accessible from all of these buildings via paths above the PMF level. Although direct ambulance access to the site would be cut in the 10% AEP event and ambulance access to the eastern footpath would be cut in the 5% AEP event, in the event of a medical emergency in a larger flood professional medical care could be provided by a registered nurse on site in the

place emergency management strategy would not result in safe occupation or the ability to evacuate safely (5.21(2)(c)), and the evacuation routes do not remain accessible in design floods (5.21(1)(d), 5.22(1)(a) and 5.22(3)(a)). These inconsistencies should be adequately resolved.

Flametree aged care facility. At least one registered nurse will be on duty at all times in the Flametree aged care facility. On the night shift there is generally one registered nurse rostered, while there are generally 2 or 3 rostered on during the morning and afternoon shifts. The Care Manager, Senior Care Coordinator and Regional Clinical Manager are also all registered nurses and will often be on site. The aged care facility is accessible via flood free routes from all other buildings subject to the SSDA.

- **Consideration of human behaviour** - The flood emergency response strategy set out in the FERP (updated and provided at **Appendix Q**) takes into consideration human behaviour. For example, a communal refuge is provided for seniors living occupants of the redevelopment who do not wish to remain in their dwelling, isolated from the seniors living community. These occupants would also be able to return to their dwellings via pathways beyond the reach of the PMF. Appendix F of the FERP also includes messaging to inform the primary contacts of the aged care residents that the site has been isolated by flooding and that it is not safe to try and reach the site.

Principle 5 Risks faced by the itinerant population need to be managed.

Any Emergency Management strategy needs to consider people visiting the area or using a development.

The Response to Submissions Letter prepared by Water Technology (**Appendix P**) confirms that the flood emergency response strategy set out in the FERP (**Appendix Q**) provides actions and refuge for any visitors to the area or the development. It is noted that any visitors without access to a dwelling would be able to shelter in the Wellness Centre, which is the communal flood refuge.

Principle 6 Recognise the need for effective flood warning and associated limitations.

As the site is subject to flash flooding, there is limited opportunity for the community to respond to a flood threat in an appropriate and timely manner. We emphasise that there are no flood watches or flood warnings issued for this catchment.

The Response to Submissions Letter prepared by Water Technology (**Appendix P**) acknowledges that there may be little or no warning available ahead of the site becoming isolated by flash flooding, and as such, evacuation off site is not recommended. It is reiterated that the main proposed refuges for the buildings subject to the SSDA are the residents' dwellings and the Wellness Centre, which would be accessible from all new ILUs via pathways above the PMF level. As such, the letter concludes that access to the proposed refuge locations for the proposed development is not constrained by flooding and there is sufficient time for residents to access their dwellings or the communal refuge.

Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.

Development within a floodplain will necessitate ongoing involvement from the NSW State Emergency Service (SES) in community awareness, preparedness, and response activities. It is essential that all site users, both during and after the construction phase, are informed of the flood risk and the measures in place to reduce risk to life. This includes:

- Raising awareness of flood risk
- Strengthening community connections
- Promoting preparedness actions
- Installing appropriate signage
- Conducting emergency drills

The Response to Submissions Letter prepared by Water Technology (**Appendix P**) confirms that the FERP (updated and provided at **Appendix Q**) contains actions for informing site users of the flood risk and measures required to reduce risk to life. These actions are proposed to ensure that:

- All ILU residents are made aware of the risk of flooding and of site isolation due to flooding and are encouraged to keep non-perishable food and drinks in their dwellings.
- General flood information about the site is permanently displayed on the facility's website (see Appendix F of the FERP).
- As part of the sales process all new residents are made aware that the site is affected by flooding and may become isolated every few years on average. In large and unlikely events isolation can last for a few hours. ILU residents requiring frequent medical or personal support may need to evacuate more frequently than once per year to ensure they are able to access medical attention.

The FERP (updated and provided at **Appendix Q**) also includes details of flood preparedness actions, flood signage, guidance on staff induction and training for their staff into their flood emergency response responsibilities and instructions on the implementation of the flood emergency response procedures for Flood Wardens.

It is concluded that the proposed redevelopment does not rely on a private flood management plan to address flood risk on the site. Flood risk is primarily addressed through structural flood risk mitigation measures, such as the passive exclusion of floodwaters in an event of any magnitude from all buildings which allows site occupants to safely occupy their dwellings or other parts of their buildings during a flood. This includes the exclusion of floodwaters from the basement, although it is not recommended that site occupants remain in the basement during a flood. Further, given the shelter-in-place strategy, the FERP has been developed to address the residual risk to life, once these structural measures have been put in place.

4.0 Further Assessment of Amended Project

4.1 Strategic and Statutory Context

Since SSDA lodgement, there have been no changes to the statutory and strategic context that would affect the site or the proposed development. The project's key statutory assessment is outlined in the EIS.

4.2 Traffic and Accessibility

4.2.1 Car Parking Provision

As outlined in **Section 2.1.1**, the reduction in basement area will result in a reduction in the total number of car parking spaces in the development. Specifically, the total number of spaces will reduce from 176 car parking spaces to 155 car parking spaces, at basement and ground levels.

A Traffic Response Letter has been prepared by Stantec and provided at **Appendix I**. The letter provides an assessment to demonstrate that sufficient parking will be provided for residents, staff, and visitors and to minimise the potential for off-site parking impacts. The assessment has considered parking rates from the Housing SEPP, the TfNSW Guide to Transport Impact Assessment, and local development standards as a guideline.

The Housing SEPP provides non-discretionary development standards for RCF and ILU floorspace, that if complied with, prevent the consent authority from requiring more onerous standards for the matters. Section 107 of the Housing SEPP notes a non-discretionary standard of 1 space for every 15 beds in a RCF, while under Section 108, a non-discretionary standard of 1 space for every 5 ILUs is provided for social housing providers.

A summary of all proposed basement parking against the relevant standards is provided in **Table 10** below. The car parking spaces for each use on site exceeds the relevant standard.

Table 10 Car Parking Requirements and Proposed Provision

Land Use	User	Size	DCP Parking Rate	SEPP Parking Rate	Community Housing Provider (SEPP)	Adopted Parking Requirement	Proposed Parking Provision	Notes
Residential Aged Care Facility (RCF)	Flametree Non Dementia	68 beds	1 space per 10 beds	1 space per 15 beds		5		
	Flametree Dementia	32 beds	1 space per 15 beds	1 space per 15 beds		2		
	Flametree – Staff	40 staff	1 space per 2 employees	1 space per 2 employees		20		
	Flametree – Ambulance Bays	-	1 ambulance parking space	1 ambulance parking space		1		
	Subtotal					28	30	Including ambulance bay
Independent Living Units (ILUs)	1 bedroom	0 dwellings	-	0.5 space per bedroom		0		
	2 bedroom	46 dwellings	-	0.5 space per bedroom	1 space for every 5 dwellings	10	46	
	3 bedroom	46 dwellings	-	0.5 space per bedroom	1 space for every 5 dwellings	10	46	
	Visitors	98 dwellings	1 space per 5 units or part thereof	-		0		SEPP does not require parking spaces for visitors. Therefore, no visitor parking is proposed.
Subtotal					20	92		
Social and Wellness Centre	Staff	3 staff	1 space per 3 employees	-		1		
	Gym & Yoga	100 m ²	-	-		3		As both SEPP and DCP do not provide suitable rates, historic data provided by TfNSW has been adopted which is 3 spaces per 100m ² .
	Salon	17 m ²	1 space per 25m ²	-		1		
	Office	52 m ²	1 space per 40m ²	-		1		
	Consulting Rooms	1	4 spaces per consulting room			4		
Café	Take-away food premises	268 m ²	1 space per 25m ²	-		11		
Subtotal						21	23	
Total						69	145	

Source: Stantec

4.2.2 Accessible Parking Provision

Schedule 4, Part 1, Section 4(2)(c) of the Housing SEPP specifies the following development standard for a group of 8 or more car parking spaces:

(2) If parking spaces associated with a class 1, 2 or 3 building under the Building Code of Australia are provided in a common area for use by occupants who are seniors or people with a disability, the following applies—

(c) for a group of 8 or more parking spaces—

(i) at least 15% of the parking spaces must comply with AS/NZS 2890.6, and

(ii) at least 50% of the parking spaces must—

(A) comply with AS/NZS 2890.6, or

(B) be at least 3.2m wide and have a level surface with a maximum gradient of 1:40 in any direction.

That is, at least 15% of the total provided car parking spaces for ILUs should be compliant with the requirements of AS2890.6, with a further 50% of spaces to either be compliant with AS2890.6 or be 3.2m in width and have a level surface with a maximum gradient of 1:40 in any direction. Additionally, at least 5% of any visitor parking spaces must comply with AS 2890.6.

An assessment of the proposed car parking provision against these requirements is provided at **Table 11**. Refer to the updated Architectural Plans at **Appendix B** for further details.

Table 11 Assessment of accessible car parking spaces for ILUs

Total spaces proposed	Accessible spaces proposed	Percentage of spaces proposed	Percentage of spaces required	Compliance
ILU resident spaces proposed	AS 2890.6 compliant spaces proposed			
	14 spaces	15%	15%	Yes
92 spaces (basement level)	3.2m wide spaces proposed			
	46 spaces	50%	50%	Yes
Visitor spaces proposed	AS 2890.6 compliant spaces proposed			
33 spaces (basement and at-grade levels)	3 spaces	9.1%	5%	Yes

As demonstrated above, the proposed car parking provision is compliant with the accessible standards under Schedule 4, Part 1, Section 4(2)(c) and Section 4(4) of the Housing SEPP.

4.2.3 Traffic Generation

Based on a review of the proposed development, as amended, in comparison to the exhibited scheme, the Traffic Response Letter confirms that the reduction in car parking spaces will result in a net reduction of 1.2 and 2.4 trips in the AM and PM peaks, respectively (refer to **Appendix I**). The letter therefore concludes that, considering the overall trip generation, the net reduction of trips following the amendments, is considered marginal and would not adversely affect the analysis in the previous assessment. As such, Stantec conclude that updated traffic modelling is not considered necessary, and the revised scheme is considered appropriate and supportable from a transport perspective.

4.3 Floor Space Ratio and Density

The floor space has been further rationalised from the scheme as previously amended under RtS and Amendment Report 1 (18,695m²), to 18,606m² under the RtS and Amendment Report 2, which results in a net reduction of GFA of 89m².

As the site area totals 29,066m² in area, the proposed FSR is **0.64:1**. It is acknowledged that this still represents a non-compliance with the relevant development standard being 0.625:1 (by virtue of Section 87(2)(a)(iii) of the Housing SEPP). An updated Clause 4.6 Variation Request has been prepared by Colliers Urban Planning at **Appendix S**. The Clause 4.6 Variation Request demonstrates that the proposed FSR is less than the non-discretionary standard under Sections 107 and 108 of the Housing SEPP, when calculated proportionately, for sites where RCF and ILUs are proposed. As such, as compliance with the non-discretionary standard is achieved, the consent authority cannot refuse, nor provide more onerous standards for the matters (i.e. FSR).

It is therefore concluded that the exceedance in the FSR for the site does not represent an unsuitable density of built form on site, and the proposed amendments to the design scheme have reduced the built form, visual and amenity impacts of the development in comparison to the exhibited scheme.

4.4 Flooding and Stormwater

The site is partly affected by an overland flow path and an existing flood storage area, specifically in the location of the proposed Building E. It is proposed to realign the overland flow path via a diversion channel around Building E on its northern side.

As per the DPHI's RFI letter dated 25 February 2026, the DPHI requested consideration to the replacement of the culvert with a 1.2m pipe, with a slight swale feature above with gentle side batters (at 1:4 to facilitate mowing). The DPHI considered this change to improve landscape quality, visual appearance and safety.

Following a review of the alternative stormwater strategy, a Response to Submissions letter has been prepared by Innovis, which confirms that the 1.2m pipe would not have the carrying capacity required for the flows (**Appendix K**). A comparison between the flow capacity of the pipe and culvert was undertaken, which demonstrated that the culvert has just over 18 times the flow capacity of the pipe.

As such, the alternate strategy seeks the retention of the culvert as part of the design, topped with landscaped turf treatment that is both trafficable and improves the visual appearance of the channel. This has been reflected in the updated Landscape Plans at **Appendix E**, with a landscape visual of the channel provided at **Appendix F**.

As such, it is considered that the diversion channel successfully managed overland flow through the site without adversely impacting adjacent properties and maintaining equivalent on-site storage capacity.

4.5 Trees and Landscaping

Allied Tree Consulting has prepared an updated Arboricultural Impact Assessment Report, provided at **Appendix H**. The amended scheme results in the removal of 104 trees on site, with the retention of 19 existing trees (three of which are subject to mitigation measures in the construction stage). Tree protection and management recommendations are provided in the Arborist report at **Appendix H**.

Notwithstanding, the proposed development has a significant landscaping strategy that will include the creation of additional new landscaped areas with a significant tree replacement planting, with 208 trees are proposed to be planted across the site.

It is noted that the amended scheme has sought to retain neighbouring trees (112-116), through an updated Bulk Earthworks Plan prepared by Innovis and provided at **Appendix G**. There are no civil works proposed within 1.5m of the property boundary to the north of the site. Updated Landscape Plans have been prepared by Arcadia and are provided at **Appendix D**.

5.0 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole, incorporating any relevant issues raised in submissions and the Applicant's response to these issues.

Any design changes or assessments undertaken are in response to issues raised in submissions or further design development and have not increased the impact of the development. The design changes are minor in nature. As such, the justification for the project as previously outlined in the EIS is reiterated and strengthened through the presented responses which comprise meaningful amendments to the Proposal.

5.1 Ecologically Sustainable Development

The EP&A Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle.
- Intergenerational equity.
- Conservation of biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

An analysis of these principles follows.

5.1.1 Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential environmental impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This RtS and Amendment Report has not identified any serious threat of irreversible damage to the environment and therefore precautionary principle is not relevant to the project. The proposal (as amended) will deliver a high standard of ESD outcomes and initiatives at the site, as described above, and will minimise environmental impacts in areas of energy, water and materials efficiency. Proactive measures to prevent environmental degradation have been included within the design, construction, and operational phases of the redevelopment. The contractor will implement environmental management plans during the construction phase and operational procedures of the redevelopment will actively pursue relevant targets to meet the relevant mitigation measures and mitigate or minimise potential environmental risks.

5.1.2 Intergenerational Equity

Inter-generational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The project (as amended) has been designed to benefit both the existing and future generations by:

- Ensuring the health, diversity and productivity of the environment are maintained through the implementation of passive and active design measures that reduce operational energy and water use from the project.
- Reducing energy, water and waste to ensure that the health, diversity and productivity of the environment is maintained for the benefit of future generations.
- Implementing safeguards and management measures to protect environmental values.
- Facilitating job creation in close proximity to homes and public transport.

The proposed development (as amended) has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

5.1.3 Conservation of Biological Diversity and Ecological Integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area. As demonstrated in the EIS and within this report, the proposed development (as amended) will not result in any significant effect on the biological and ecological integrity of the study area, subject to the mitigation measures of the EIS.

5.1.4 Improved Valuation, Pricing and Incentive Mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

5.2 Likely Impacts of the Development

Having regard to the natural environment, built environment, economic and social impacts of the proposed development, the likely impacts of the development (as amended) are considered acceptable as outlined in the following sections.

5.2.1 Natural and Built Environment

The proposed development (as amended) has demonstrated that the proposal will generate limited environmental impacts, due to the proposed mitigation measures and the design of the development. All potential environmental impacts are thoroughly addressed in the EIS and **Section 4.0** of this report.

5.2.2 Social and Economic

The proposal, as amended, responds to concerns raised within the submissions and will deliver substantive public benefits for the Woonona community and the Wollongong Local Government Area, including that of the following:

- It will contribute to meeting the strategic need for additional housing diversity including the provision of seniors housing in an accessible location;
- Provide onsite services and communal open space to enable social interaction amongst residents;
- It will provide significant investment in the seniors housing sector within the Wollongong LGA that will provide both construction and operational employment opportunities; and;
- It will provide a contemporary, high amenity village, with support services and facilities to provide ILUs and RCF that meets modern day standards, which provides opportunities for residents to age in place and accommodate a continuum of care.

5.3 Suitability of the Site

Having regard to the characteristics of the site and its location, the proposed development (as refined and amended) is suitable for the site as:

- The site is currently an operational seniors housing village and no change of use is proposed.
- The site is zoned R2 Low Density Residential and E3 Productivity Support under the Wollongong LEP, whereby seniors housing is a permissible land use on the site under the Wollongong LEP and Housing SEPP. Shop top housing is an additional permitted use in the E3 zone on this site, which enables the entire site to access the height and FSR bonuses of the Housing SEPP.
- The development has been designed to be undertaken in a manner that minimises impacts on its surrounds, and has been designed to respect the natural, historical, and environmental qualities of the site.
- It will not result in any significant environmental impacts that cannot be appropriately mitigated or managed through adherence to the mitigation measures and standard conditions of development consent.

6.0 Conclusion

Following the receipt of DPHI RFI letters, including additional comments of Wollongong City Council and other government agencies, the Applicant comprehensively reviewed each submission made.

Amendments have been proposed to the project to account for further refinement and enhancement of the proposed design, seeking to minimise impacts and improve amenity. The range of design refinements made in response to submissions from government agencies and Council are summarised in **Section 0**.

The proposed development will not give rise to unacceptable environmental impacts and is supportable from a planning perspective. Therefore, it is recommended that this SSDA be approved subject to standard conditions of consent, given that the proposed development:

- is consistent with the relevant strategic planning framework and guidelines;
- is consistent with the relevant statutory legislation and requirements;
- will not generate unreasonable environmental impacts; and
- is suitable for the site, and in the public interest

