



5 February 2026

Lucinda Craig  
Social and Affordable Assessment  
Department of Planning, Housing and Infrastructure  
E: [lucinda.craig@planning.nsw.gov.au](mailto:lucinda.craig@planning.nsw.gov.au)

Dear Madam,

***Mingara Recreation Club Seniors Housing, Tumbi Umbi (SSD-63475709) – Council Submission***

I refer to your email of 15 January 2026 where a time extension was granted until 4 February 2026 for Council to provide the comments on SSD-63475709.

Council raises the following outstanding concerns in relation to the amendments undertaken by the applicant regarding the proposed development:

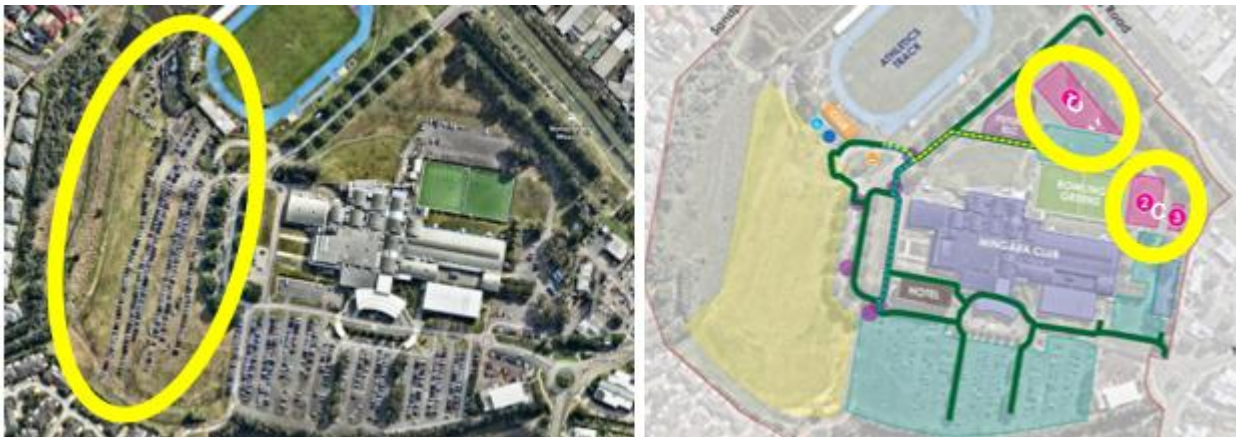
- The proposal to utilise existing grassed areas on the site for car parking which is impacted by flooding, is not supported. The proposed car parking should be re-located within the site which is not impacted by flooding. Refer to the Development Engineering comments provided below for further information.
- Council has identified several outstanding issues which were previously raised regarding the architectural design and overall access and circulation of the proposed development. Refer to the Urban Design comments provided below for further information.
- The proposed Vegetation Management Plan (VMP) in its current form does not meet Council's Flora and Fauna Guidelines nor does it demonstrate best-practice standards for riparian ecological restoration associated with a State Significant Development. Council recommends that the VMP be revised and conditioned as a mandatory, enforceable, ecological management document, including a 5-year maintenance period, along with the recommendations outlined in Council's previous submission regarding this proposal. Refer to the Ecological comments provided below for further information.
- Council's Water and Sewer Section have provided information pertinent to the proposed development and recommendations for the proposed development which the applicant is required to implement. Refer to the Water and Sewer comments provided below for further information.



## DEVELOPMENT ENGINEERING

The proposal to utilise existing grassed areas on the site for car parking which is impacted by flooding is not supported by Council. Council considers the proposed car parking will not be an adequate solution to the displacement of the existing parking currently adjoining the south western boundary of the athletics track and on the north west of the site (refer to Figure 1).

The proposed car parking should be re-located within the site which will not be impacted by flooding. This will require amended plans and potentially a revised Traffic and Parking Impact Assessment Report in order to demonstrate that the revised car parking area will not be impacted by flooding and the layout will be satisfactory in terms of manoeuvrability and traffic movements.



**Figure 1:** Cars parked on the grass near the athletics track on Thursday, 18 August 2022 and proposed car parking relocation

## ECOLOGY

Council advise that several key elements of the Vegetation Management Plan (VMP) have not been resolved in the amendment.

The applicant's amendments to the VMP do not satisfy the ecological intent or technical restoration requirements outlined in Council's earlier submission.

The following issues remain with VMP:

- The VMP is framed incorrectly as voluntary landscaping rather than an ecological mitigation measure to alleviate the direct and indirect impacts to biodiversity resulting from the SSD
- The VMP does not meet a 5-year maintenance period,
- The VMP does not adopt SMART principles or multi-phase staging,
- The VMP offers insufficient detail on local provenance planting, planting densities and weed management, and

- The VMP minimises opportunities for community education.

As a result, the VMP in its current form does not meet Council's Flora and Fauna Guidelines nor does it demonstrate best-practice standards for riparian ecological restoration associated with a State Significant Development.

Given these deficiencies, Council recommends that the VMP be revised and conditioned as a mandatory, enforceable, ecological management document, including a 5-year maintenance period, along with the recommendations outlined in Council's previous submission.

## **URBAN DESIGN**

### Visual dominance of car parking

- The issue of visual dominance of car parking remains. Two (2) spaces are provided for each villa in the form of stacked parking, which also needs to accommodate visitors. The garages to each villa are external to the building form and are located in front of the villas, then the secondary car spot is located in front of the garage. This is unlike general housing where garages are located within the building form. The protrusion of the garages exacerbates the visual intrusion of the car parking. In addition, the driveway needs to accommodate a second vehicle or visitor parking meaning it will nearly always be in use. It is also common for people to use their garage as a storage area and park in their driveway or in the street. This common scenario will not be possible in this development.
- The issue of visual dominance of car parking remains and is not assisted by updates to the CGIs. The drawings are contradictory with respect to the provision of villa arbours and cannot be relied upon for an accurate reflection of the actual appearance of the development. The architectural plans show no arbours in front of villas, the elevations and the landscape plans show the occasional arbour for every 4 villas, and the CGI image shows 2 arbours for every 4 villas. Regardless of the discrepancies in information, the occasional arbour does little to disguise the fact that the garages protrude like small industrial sheds in front of the villas, and are not an appropriate design response for a residential development. The villas should be redesigned to incorporate adequate parking within the building form and allow for sufficient visitor spaces external to the villas.

### Distance from visitor parking

- The issue of the distance of visitor parking from the villas remain. As discussed above, two (2) spots are provided for each of the villas in the form of an external garage and a driveway. If the garage is used for storage, or the occupants have 2 cars, then visitor parking in the driveway is not possible. The laneway is not wide enough to provide any 'on-street' parking, so visitors may need to park elsewhere. It is important to recognise that the proposed development is in an area not well-



serviced by public transport and cars will be required by visitors and residents alike. The development needs to be redesigned to suit the local area and allow for visitor car parking adjacent to the villas

#### Absence of Masterplan

- The absence of a masterplan for the precinct is evident in the number of issues within the seniors living development. A masterplan for the site would have assisted in the identification of activity areas and guided the planning of the provision of adequate circulation for both vehicles and pedestrians, at the very least. It would have resulted in a development that is a better fit for the precinct as a whole. A development of this size and density cannot be thought of in isolation.

#### Inadequate indoor communal facilities

- The indoor communal facilities appear to be limited to a couple of multi-purpose rooms and a café servery with communal lounge. The seating in the café is for 44 people and there are 4 seats in reception. These areas seem enough for only the residents and visitors to the aged care facility. The types of indoor facilities only provide one form of recreation. If the access to the club facilities are not available or residents can't make it to the club, their options are very limited.

#### Inadequate communal facilities

- The statement that the space in Building 2 is more than adequate to accommodate all residents is clearly incorrect. There are 215 villas or units and 39 aged care beds. This gives a potential maximum population of 469 residents. There is seating for 48 people shown in the areas of Building 2 on the ground floor. Even if the multi-purpose rooms were seated to capacity, these areas could only contain half of the potential maximum population of residents only.

#### SK302 and SK303

- It is agreed that these sketches have now been provided and that landscaping is indicated in some areas in front of the ground level parking. However, landscaping can't be relied on to screen the parking as fire fighting regulations often require a clear space around the building to stop vegetation and fire fuel building up and to allow a clear space for fire fighters to access the external faces of the building. Suggest that the development needs to be redesigned to provide ground level apartments to provide surveillance at ground level, and that parking needs to be screened behind the apartments or located in a basement. At the very least, the parking for the buildings should be located in a partially submerged basement that projects no more than 1m above ground level. This will provide a much less of a visual intrusion than a 3-4m high masonry wall surrounding the buildings. The current appearance of the building with the wall of car parking is evident in the drawing provided showing the materials Drawing noDA3.20 Building Aesthetics Concept (apartments). In this drawing the

materials of the apartment facades appear to be in shades of brown sitting on a brown masonry podium. The podium is punctuated by wire mesh or openings in the block work for doors. The design looks quite brutalist and depressing and does not have the appearance of a new building. The junction between the podium and the tower element seems poorly resolved. It would be concerning if this is the vision for the development the whole way around.

#### Visual dominance of car parking

- Issues of visual dominance of car parking remains. The statement that the protruding garages are common to suburbs is false. A lot of LGAs go to great lengths to reduce the presence of garage dominance in development, and certainly do not allow the garages to protrude forward from the building form continuously as part of a streetscape. Refer to the Sun-Eye diagrams DA7.02 and DA7.03 for 3D images of the protruding garages.

#### Lack of surveillance

- The addition of a single bedroom window does not resolve the fundamental issues in the design, where the garages protrude forward from the building form and obstruct any possible views of the street.

#### Lack of differentiation between buildings

- Concern still remains regarding the external aesthetic of the buildings. Perspectives of each building should be provided to demonstrate that each building will have a clear different identity and that the design has been thought about in the round. Entry ways should be articulated in building form in the façade, not just by using a glazed brick. The buildings need a higher design resolution and changes to the layout to ensure that blank walls are not the dominant feature, particularly at ground level.

#### Solar access

- The additional information and the Sun-Eye diagrams assist in providing a better idea of the solar access available to the units in the buildings. A solar video or screen shots would further assist in a detailed assessment. The development still seeks to rely on skylights to satisfy solar access requirements where these are only a secondary light source and can't be included in the calculations. A lot of the villa dwellings appear to have living areas which face away from the sun. This issue could be addressed through a redesign while resolving the other issues in the development.

#### Vehicle Access

- Appendix A and Appendix C are very large documents. No drawing reference no. is provided in the response. The overall ground floor plan of the development has no dimensions on the drawing.



#### No turning heads

- The Ground Level plan DA2.01 shows no turning heads to any of the dead ends in the internal laneway. Basic turning areas are required, especially for a laneway that is narrow, has dead-ends, will need access by service vehicles, and is expected to service 50+ villas.

#### 3.5m wide laneway

- It is not clear which plan is referred to and where this is located in the documentation.

#### Lack of access for removalist vehicles

- It is not acceptable to rely on vehicles manoeuvring on lawns and driveways to access a development. Children or the elderly could be on the lawns and cars will be parked in the driveways as the parking is stacked and there is no on-street parking. It is a basic requirement of a development of this density to have safe and separate vehicle areas to service the development. The development needs urgently to be redesigned with safety in mind.

#### Lack of access for fire service vehicles

- A redesign is required as a matter of priority. The fire truck may well park in the designated spot initially, but more than likely will go straight to the location of the fire. Often there will be more than one truck attending as well as police and ambulance services. A suitably qualified person should be engaged directly with the designers to inform the provision of appropriate vehicle access.

#### Lack of access for ambulances

- The response provided by the applicant seems to be evident of the failure to understand the core issues of emergency vehicle access to a development of this scale that is not readily accessible from a street. An additional ambulance bay will not solve the issue. Ambulances will still need to park as closely as possible to the patient, especially if they are unconscious in a villa in the rear of the development.

#### No continuous pedestrian pathway

- It may be appropriate to have shared zones in a small villa development of say 10 villas where surveillance is good and there will be ample room and time to allow for sharing between pedestrians and vehicles. But in a higher density development with a lot of villas, units, residents and visitors, where vision is obstructed by the presence of parked cars, it is essential that pedestrian and vehicle zones are separated to avoid any accidents. Bearing in mind that this is a seniors living development where seniors may have mobility issues and cannot get out of the way of cars by running onto the lawn. A pedestrian only pathway is essential to the provision of this development.

## WATER AND SEWER

- The “appendix R updated sewer servicing plan” indicates a sewer main extension from existing 225 mm gravity sewer main along Wyong Rd. Please note that the whole development (both stage 1 & 2) will be required to connect to this sewer and it is applicant’s responsibility to ensure the proposed development is designed accordingly.
- For water servicing, the proposed development will be required to connect to the existing water main along Silver Gull Place due to the proposed height is greater than 4 storey (but less than 8). Pipe works beyond Council water meter will be considered as private plumbing and will need to comply with AS3500 and inspected by Council plumbing and drainage team. Applicant can apply for the new water service on Council website via Property Application Portal.
- “Appendix L Electrical and Hydraulics Report” indicates a water service connection for the proposed display suite on site.
- Water and Sewer Developer Charges will be applicable for the proposed development.
- Applicant is required to lodge a S305 application under the Water Management Act and obtain a S307 Certificate prior to issue of the subdivision certificate and occupation certificate.

## TRAFFIC

- The proposal includes stacked parking in front of the villa garages and some within ground floor parking in building 1,3 and 4. Council's DCP permits stacked parking for only a dwelling houses and dual occupancies.
- The amended proposal includes an Event Traffic Management Plan that will manage traffic, parking and pedestrian movements within the precinct during special events like athletics carnival.
- The amended proposal now includes turning provision at the dead ends of the access driveways and demonstrated through swept paths that an ambulance (largest vehicle expected to access road) can turn around using these turn-around provision. Swept paths also demonstrated that fire truck, waste vehicle, and removalist trucks can turn around onsite at appropriate locations within the site and drive-in and out in a forward direction.
- It is noted that the development site is part of a larger precinct and land locked and there is no option for direct separate access to a public road, as result must rely on the existing private road network within the precinct for access. The proposed development is a low traffic generating development. The SIDRA modelling demonstrates that the additional traffic has negligible impact to the surrounding road network.



- The amended proposal provides internal roads with a trafficable width of 5.8m, along the majority of the length. This width exceeds the minimum width for two-way internal roads (5.5m). The 5.8m width comprises a road and trafficable turf system. There is ample passing opportunities provided along the roadways.
- It is noted that commercial vehicles larger than an SRV or ambulance will not be permitted to enter the roadways, except for 12.5m Fire Trucks which can complete a 3-point turn at the intersection between Building 3 and Villas7/6.
- The proposed development provides a number of additional pedestrian linkages connecting to the existing pedestrian network within the club precinct. All internal roadways will be sign posted as shared zone areas with a mandatory 10km/h speed limit.
- As part of the Event traffic Management Plan visitors will be advised to utilise the designated short term drop off/pickup (DOPU) bays located adjacent the Athletics Track Club entrance for all DOPU activities. Five (5) accessible parking spaces are provided adjacent to the Athletics Track Club entrance for visitors requiring these spaces. During special events visitors and all other athletics track users will be informed of the available all-weather and overflow visitor car parking areas.
- As part of the amended proposal and Event Traffic Management plan proposed coach/bus drop off/pick up area has been designed in accordance with Austroads and AS2890.2 (2018) with sufficient turning area to allow a 12.5m long coach/bus to complete a turning manoeuvre. Three (3) x 12.5m long coaches/buses can park nose to tail within the roadway.

**Please note this submission has been provided by Councils technical staff and further comments may be provided once the proposal has been reviewed by Councils Environment & Planning Committee.**

Should you have any questions please contact Council's Senior Development Planner, Kirra Hartley on 0436 522 371 or via email [Kirra.Hartley@centralcoast.nsw.gov.au](mailto:Kirra.Hartley@centralcoast.nsw.gov.au)

Regards

A handwritten signature in black ink, appearing to read "AS Stuart".

Antonia Stuart  
**Section Manager**  
**DEVELOPMENT ASSESSMENT**



