PEGASUS ADVISORY

Environmental Impact Statement

State Significant Development Application (SSD-101444458)

810 Pacific Highway, Gordon

Prepared for:

Ecove Group Pty Ltd

February 2026

Project Director

Brendan Nelson – RPIA (Fellow) REAP GAICD
Managing Director, Pegasus Planning & Advisory Pty Ltd

Contributors

Stuart McIntosh OLY – MPIA – Solve Property Group (SPG)

Revision	Revision date	Status	Authorised
1.0	09/01/26	SPG Final	Bn, SM
1.1	19/01/26	Final for Review	Bn
1.2	06/02/26	Updated Draft	Bn
1.3	23/02/26	Final for Submission	Bn
1.4	02/03/26	Final - Jobs	Bn
1.5	03/03/26	Final - Consultation	Bn

Contact

Pegasus Planning & Advisory Pty Ltd
PO Box 1999
KINGSCLIFF NSW 2487

www.pegasus-advisory.com.au

TABLE of CONTENTS

Declaration

Signed EIS Declaration

Project details	
Project name	810 Pacific Highway, Gordon
Application number	SSD - 101444458
Project address	810 Pacific Highway, Gordon

Applicant details	
Applicant name	Ecove Group Pty Ltd
Applicant address	Level 1/3 Australia Avenue, Sydney Olympic Park NSW 2127
Applicant Postal address	Locked Bag 1451, Meadowbank NSW 2114

Details of people by whom this EIS was prepared

Name	Qualification	Address
Brendan Nelson, Managing Director – Pegasus Planning & Advisory Pty Ltd	BSc (Env Science) Griffith; GDURP (with Distinction) QUT	
Stuart McIntosh OLY, Principal – Solve Property Group	Bachelor of Planning, Master of Urban Management and Planning (Western Sydney University)	PO Box 1999, Kingscliff NSW 2487

Declaration by Registered Environmental Assessment Practitioner

The undersigned declares that this EIS:

- has been prepared in accordance with Sections 190-192 of the *Environmental Planning and Assessment Regulation 2021*;
- contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates;
- does not contain information that is false or misleading;
- addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;
- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement (DPIE, March 2024);
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.

Name	Brendan Nelson
Registration number	RPIA (Fellow) REAP - 4815
Registration organisation	Planning Institute of Australia
Signature	
Date	3 March 2026

Glossary and Abbreviations

Item	Description
Applicant	Ecove Group Pty Ltd c/o – Pegasus Planning & Advisory Pty Ltd
CPTED	Crime Prevention Through Environmental Design
CHP	Community Housing Provider
DPHI	NSW Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EP&A Act	Environmental Planning and Assessment Act 1979
KLEP 2015	Ku-ring-gai Local Environmental Plan 2015
SSD	State Significant Development
SSDA	State Significant Development Application
REAP	Registered Environmental Assessment Practitioner
Site	810 Pacific Highway, Gordon
GFA	Gross Floor Area
HOB	Height of Building

Executive Summary

This Environmental Impact Statement (EIS) has been prepared by Pegasus Planning & Advisory (with the assistance of Solve Property Group) on behalf of Ecove Group Pty Ltd (the Applicant) to support a State Significant Development Application (SSD) for the redevelopment of 810 Pacific Highway, Gordon (the Site) within the Ku-ring-gai Local Government Area.

The application is made as State Significant Development pursuant to Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* and seeks to modify and amend the development previously approved under local Development Application DA-0610/17.

The inclusion of infill affordable housing and reliance on Chapter 2, Part 2, Division 1 of the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) results in the amended scheme being assessed under the SSD pathway. The proposal, therefore, comprises an amended integrated mixed-use redevelopment delivered under the Housing SEPP infill affordable housing provisions.

This EIS has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued on 9 December 2025 and to inform the community, relevant government agencies and the consent authority in their consideration of the proposal.

The Proposal

The proposed development comprises a high-quality mixed-use shop-top housing redevelopment, including:

- 180 residential apartments, including 39 affordable housing apartments (10 x 1-bedroom, 24 x 2-bedroom and 5 x 3-bedroom);
- a ground-floor full-line ALDI supermarket and supporting retail/commercial components;
- generation of significant employment, including approximately 308 jobs during construction and 135 ongoing operational jobs associated with the retail and mixed-use components; and
- basement parking, servicing, public domain works and ancillary site works.

The Site is located within the Gordon Local Centre and within walking distance of Gordon Railway Station, enabling a transit-oriented outcome that concentrates new housing and services in an established, well-serviced centre.

State Significant Development and Affordable Housing Delivery

The application relies on the infill affordable housing provisions in Chapter 2, Part 2, Division 1 of the Housing SEPP, including the application of bonus provisions in exchange for affordable housing to be delivered and managed by a registered Community Housing Provider (CHP).

The proposed built form includes minor departures from the Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015) development standards relating to floor space ratio and building height. These departures are addressed through written requests made pursuant to Clause 4.6 of the KLEP 2015, with detailed justification provided in Appendix V (Floor Space Ratio) and Appendix U (Building Height).

The proposal provides a combined thirty-nine (39) affordable housing apartments comprising:

- Thirty (30) Infill Affordable Housing apartments provided in accordance with the Housing SEPP and managed by a registered CHP for a minimum period of 15 years; and
- Nine (9) Infill Affordable Housing apartments provided in accordance with the Ku-ring-gai Local Environmental Plan 2015 (KLEP) clause 6.14 and as managed by a registered CHP in perpetuity (as detailed in Chapter 4).

The development delivers a total Affordable Housing GFA of 3,812.7 m². The affordable housing mix responds to identified needs and is supported by a detailed feasibility and viability assessment demonstrating a deliverable and proportionate outcome, having regard to site constraints and cumulative obligations.

Key Issues and Assessment Findings

The key issues identified in the SEARs have been assessed in detail, supported by specialist technical reports. The assessment in Chapter 6 identifies that, subject to the implementation of mitigation measures and appropriate conditions of consent, the development:

- can be delivered without unacceptable impacts on local amenity, including wind, noise, vibration and construction impacts;
- can be serviced by available infrastructure networks, subject to localised augmentation and standard authority approvals;
- can be accommodated within the surrounding transport network with appropriate access, servicing and traffic management arrangements;
- will not result in unacceptable environmental impacts in relation to biodiversity, heritage, contamination or groundwater; and
- will deliver a positive strategic and town centre outcome through activated street frontages, improved permeability and a high-quality mixed-use built form.

The assessment confirms that there are no identified environmental constraints that would preclude the proposed development, and that residual construction and operational impacts can be effectively managed through established mitigation, monitoring and management frameworks.

Project Objectives and Public Benefits

The proposal delivers the following key objectives and public benefits:

- Affordable housing delivery in a highly accessible centre location, contributing to broader NSW housing and affordability objectives;
- increased housing supply and diversity, including universal and adaptable design considerations, in proximity to public transport, services and employment;
- the redevelopment of a partly demolished, underutilised site within the Gordon Local Centre;
- a high-quality built form outcome consistent with the evolving character and function of the Gordon town centre; and
- delivery of a full-line supermarket and employment-generating retail/commercial floor space that supports the day-to-day needs of residents and workers and reinforces Gordon's role as a centre.

Overall, the EIS concludes that the proposal is consistent with the strategic planning framework, satisfies the Housing SEPP infill affordable housing pathway, and is capable of being approved subject to appropriate mitigation measures and conditions to manage construction and operational impacts.

1 Introduction

1.1 Purpose of this Environmental Impact Statement

This Environmental Impact Statement (EIS) has been prepared by Pegasus Planning & Advisory (with the assistance of Solve Property Group) on behalf of Ecove Group Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) for a mixed-use development at 810 Pacific Highway, Gordon, within the Ku-ring-gai Local Government Area.

The purpose of this EIS is to:

- describe the proposed development;
- assess its potential environmental, social and economic impacts;
- identify mitigation measures where required; and
- enable the consent authority, government agencies and the community to understand the nature, impacts and merits of the proposal and make informed submissions or decisions.

This EIS has been prepared in accordance with:

- the Environmental Planning and Assessment Act 1979 (EP&A Act);
- the Environmental Planning and Assessment Regulation 2021;
- the Secretary's Environmental Assessment Requirements (SEARs) issued for SSD-101444458; and
- the Department of Planning, Housing and Infrastructure's State Significant Development Guidelines – Preparing an Environmental Impact Statement.

This EIS should be read in conjunction with the supporting technical reports and plans submitted with the SSDA.

1.2 Applicant Details

The Applicant details for this SSDA are provided in Table 1 below.

Table 1: Applicant Details

Applicant Name	Ecove Group Pty Ltd
Applicant Address	c/o Pegasus Planning & Advisory Pty Ltd PO Box 1999 Kingscliff NSW 2487
Nominated Contact	Brendan Nelson, Managing Director brendan@pegasus-advisory.com.au (m) 0467 719 198

1.3 Project Overview

The proposal seeks consent for the redevelopment of 810 Pacific Highway, Gordon, for a high-quality 28 storey mixed-use shop-top housing development, comprising:

- 180 residential apartments, including 39 affordable housing apartments;
- a ground-floor full-line ALDI supermarket and supporting retail/commercial components;
- generation of significant employment, including approximately 308 jobs during construction and 135 ongoing operational jobs associated with the retail and mixed-use components; and
- 6 basement levels providing 269 car parking spaces, servicing and ancillary works.

The site is strategically located within the Gordon town centre and is in close proximity to Gordon Railway Station, established retail uses and civic facilities. The proposal (Figure 1) represents the comprehensive redevelopment of a site previously approved for mixed-use development and currently vacant following partial demolition under those approvals.

This SSDA seeks to amend the existing development approval (as modified) (DA0610/17) (Appendix LL) issued by Ku-ring-gai Council. The existing development consent proposed the construction of a 7 storey mixed-use shop-top housing development, comprising:

- 55 residential apartments (with no affordable housing apartments);
- A ground-floor full line ALDI supermarket and supporting retail/commercial components; and
- 3 basement levels providing 137 car parking spaces, servicing and ancillary works.

The SSD relies on demolition, excavation, shoring, and piling works to RL 107.64 m AHD, approved under DA0610/17. These approved 'early works' enable the project to commence prior to the finalisation of the SSD, allowing the development to be completed ahead of the planned redevelopment of the Gordon Centre (anticipated in late 2028). This timing will ensure continuity of shopping facilities for Gordon residents. Excavation, shoring and piling beyond RL 107.64 m AHD to RL102.214m AHD will be undertaken pursuant to this SSD.

A detailed and consolidated description of the proposed development, including built form, layout, staging and comparison with the approved development, is provided in Chapter 3 – Project Description. All SEARs, including industry-specific matters, are addressed in Appendix A and throughout Chapters 3–6.

Figure 1: Proposed Development
(source: Appendix I - Architectural Design Report & Aboriginal Design Principles)

1.4 Project Objectives

The Applicant seeks consent to construct a mixed-use residential development, including affordable housing, at the site. Ecove is one of Sydney's leading vertically integrated apartment developers with an extensive portfolio of successfully delivered mixed-use projects, including individual sites with complex factors (in this case, slope and adjacency to the Pacific Highway). Ecove has partnered with

Aldi to deliver a full-line supermarket, which has been in the planning for several years but has not been delivered under the existing approvals due to significant feasibility challenges.

The objectives of the project are to:

- facilitate the redevelopment of an underutilised site within the Gordon town centre in a highly accessible location;
- deliver a mixed-use outcome that supports the role and function of Gordon as a local centre;
- provide a ground-floor full-line supermarket and employment-generating floor space;
- deliver high-quality residential apartments, including affordable housing, within walking distance of public transport and services;
- achieve a built form that contributes positively to the character, amenity and activation of Pacific Highway and Dumaresq Street; and
- deliver a safe, well-designed and sustainable development outcome that incorporates a substantial and viable affordable housing component, with a mix of dwelling sizes, to help meet State and local housing objectives in partnership with a Registered Community Housing Provider.

1.5 Site Details

The subject site is located at 810 Pacific Highway, Gordon, within the Ku-ring-gai Local Government Area. The land is legally described as Lot 12 on DP 631351 and has an area of 2,357 m².

A former five-storey commercial office building previously occupied the site and has been partially demolished in accordance with existing approvals, leaving the site vacant and available for redevelopment.

The land is zoned E1 - Local Centre under the *Ku-ring-gai Local Environmental Plan 2015* (KLEP 2015), which permits a mix of retail, commercial, and residential uses consistent with Gordon's role as a strategic centre.

Further details on the site and surrounding context are provided in Chapter 2 – Strategic and Site Context.

1.6 Project Background

Development consent (DA0610/17) was granted on 12 December 2018 on the subject site by the Sydney North Planning Panel for the demolition of existing structures and construction of a mixed-use development. The approved scheme comprises:

- 56 apartments in a shop-top housing format (one, two and three-bedroom mix).
- No Affordable Housing requirement.
- Ground floor Aldi supermarket and a small retail suite, supported by storage, loading and back-of-house functions at lower ground level.
- Three basement levels accommodating 137 car parking spaces for residents, visitors and retail customers.
- Associated landscaping, signage, earthworks and tree removal, including relocation of a Canary Island Date Palm.

The original consent was issued as a Deferred Commencement Approval, requiring the satisfaction of specified pre-conditions prior to the commencement of development, including matters relating to construction traffic management. The consent has since been modified on three occasions. Modifications MOD0222/20 (21 September 2021) and MOD0194/21 (18 November 2021) removed the

deferred commencement condition, amended the approved development description, reducing the number of approved apartments to 55, and incorporated an updated Construction Traffic Management Plan into the approved documentation.

A further modification (MOD0061/25), recently approved by Council, authorises increased excavation depth, realignment of basement walls in the north-eastern corner of the site to RL107.64m AHD, and amendments to conditions relating to the issue of construction certificates to facilitate preliminary basement excavation works.

This SSDA seeks approval for an amended development scheme under the State Significant Development pathway. If approved, the SSDA would amend the existing development consent (DA0610/17) and its associated modifications.

1.7 Structure of this Environmental Impact Statement

Table 2 below sets out the structure of this EIS.

Table 2: Structure of the EIS Report

Chapter	Description
Chapter 1 – Introduction	Introduces the proposal, the Applicant, the purpose of the EIS and the assessment framework.
Chapter 2 – Strategic and Site Context	Describes the strategic planning framework and the site and surrounding context.
Chapter 3 – Project Description	Provides a consolidated description of the proposed development and its relationship to the approved development.
Chapter 4 – Statutory Context	Outlines the statutory approvals framework and assesses permissibility and compliance with planning controls.
Chapter 5 – Engagement	Summarises engagement undertaken and proposed.
Chapter 6 – Assessment of Impacts	Assesses the environmental, social and economic impacts of the proposal and identifies mitigation measures.
Chapter 7 – Project Justification	Provides an overall evaluation of the proposal, having regard to the public interest and the objects of the EP&A Act.
Appendices	
Appendix A - SEARs Compliance Table	
Appendix B - Statutory Compliance Table	
Appendix C - Community Engagement Report	
Appendix D - Mitigation Measures Table	
Appendix E - Amending DA Conditions Table	
Appendix F - Registered Community Housing Provider - Letter of Agreement	
Appendix G - Affordable Housing & Viability Assessment	
Appendix H - Architectural Drawings	
Appendix I - Architectural Design Report & Aboriginal Design Principles	
Appendix J - BCA Regulatory Compliance Report	
Appendix K - Construction & Demolition Waste Management Plan	

2 Strategic Context

2.1 Strategic Rationale

The proposed development is located within an established strategic centre that is well served by public transport, community infrastructure and services. Redevelopment of the site supports State and regional planning objectives by accommodating population growth through increased housing supply in accessible locations, while reinforcing the role and function of centres.

The proposal will deliver additional housing, including affordable housing, within walking distance of Gordon Railway Station and established employment, retail and civic uses. It represents an efficient use of serviced land within an existing centre and contributes to metropolitan objectives for compact, well-connected urban growth.

Consistent with NSW Government priorities to increase housing supply across metropolitan Sydney, the proposal also supports the objectives of the National Housing Accord by contributing to the delivery of both market and affordable housing in well-located areas.

2.2 Strategic Policy Context

The proposed development is consistent with the relevant State, regional and local strategic planning framework. A summary of strategic alignment is provided in Table 3 with further discussion below.

Table 3: Summary of Strategic Policy Context

Strategic Document	Relevance and Alignment
Draft Sydney Plan	Supports increased housing within established centres and close to public transport, consistent with the Sydney Plan's focus on well-located, accessible housing. The proposal delivers additional housing, including affordable housing, within walking distance of Gordon Railway Station and local services, contributing to productivity, liveability and sustainability outcomes.
Greater Sydney Region Plan – A Metropolis of Three Cities	Supports increased housing within established centres and near public transport to achieve the 30-minute city. The proposal delivers housing within walking distance of Gordon Station and services, consistent with regional productivity, liveability and sustainability objectives.
Northern District Plan	Encourages housing growth in centres with access to transport and services. The proposal supports Planning Priorities relating to infrastructure use, liveability, productivity and environmental outcomes within the Northern District.
Ku-ring-gai Local Strategy Planning Statement	Aligns with Council priorities for housing close to transport, diverse housing choice, delivery of affordable housing and reinforcement of Gordon as a key local centre.
Future Transport Strategy 2056	Supports development in locations with strong public transport accessibility and integration of land use and transport outcomes.

Figure 2 illustrates the strategic context of the site within the Gordon Local Centre.

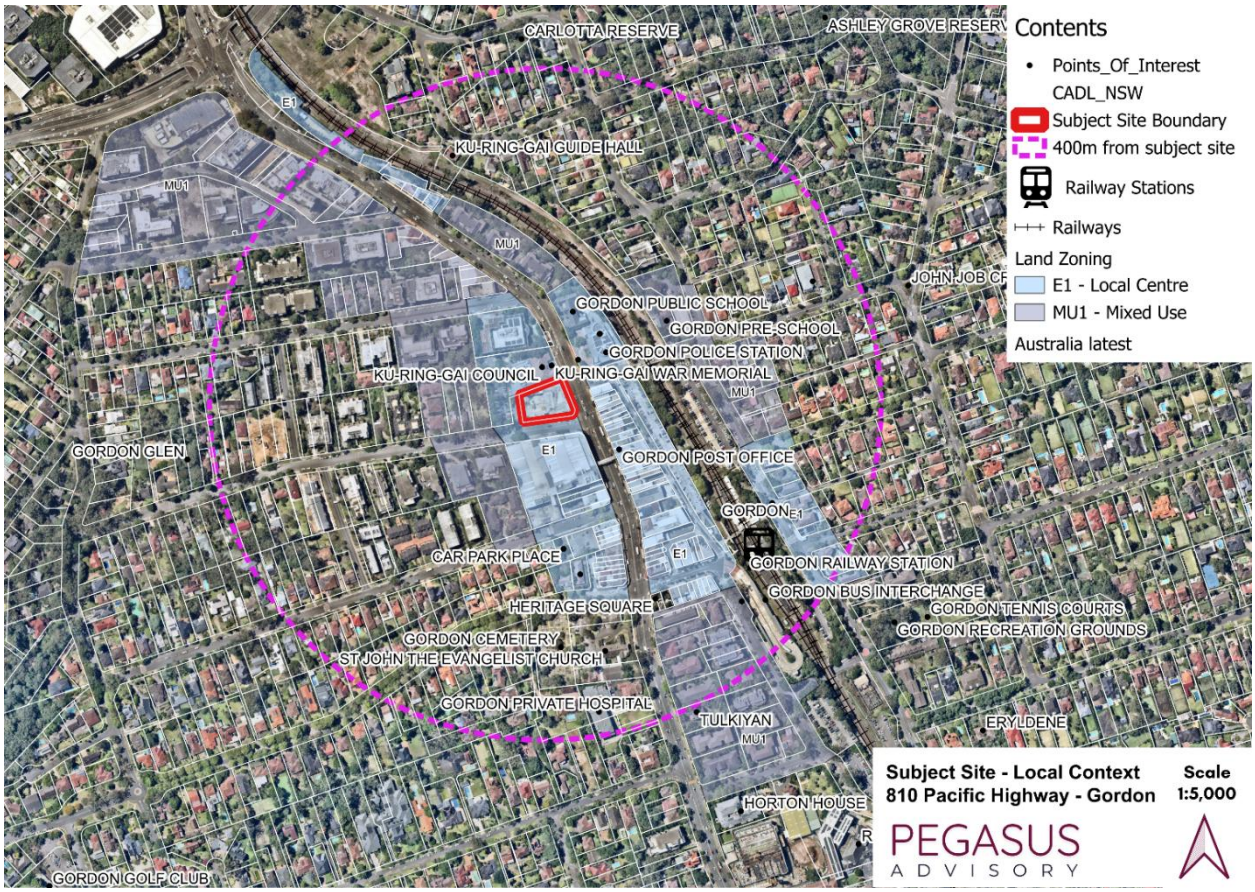

Figure 2: Strategic Context of the Subject Site within the Gordon Local Centre
(source: Pegasus Planning & Advisory, nearmap and NSW Planning Portal)

Draft Sydney Plan

The draft Sydney Plan establishes a strategic framework for accommodating growth by prioritising housing delivery within established centres and locations well served by public transport, jobs and services. The Plan seeks to improve access to housing and employment within a 30-minute public transport catchment, reduce car dependence, maximise the use of existing infrastructure and support compact, walkable urban form.

The proposed development directly supports these objectives by delivering new housing in an established strategic centre with high levels of accessibility. The site is within walking distance of Gordon Railway Station and is served by frequent rail and bus services connecting to North Sydney, the Sydney CBD, Macquarie Park, Parramatta and other key employment and service centres. This location enables residents to access jobs, services and amenities efficiently, reducing travel times and reliance on private vehicles.

The redevelopment represents an efficient use of serviced land within an existing centre, reinforcing Gordon's role as a mixed-use location that integrates housing with retail, employment and community functions. By locating additional housing in a centre with established infrastructure and services, the proposal supports the Sydney Plan's emphasis on concentrating growth in areas with capacity, while minimising environmental impacts associated with dispersed or car-dependent development patterns.

Overall, the proposal is consistent with the strategic directions of the draft Sydney Plan by contributing to increased housing supply in a well-connected centre, supporting compact urban growth, and advancing broader metropolitan objectives for productivity, liveability and sustainability.

Greater Sydney Region Plan – *A Metropolis of Three Cities*

The Greater Sydney Region Plan establishes a vision for a metropolitan area where residents can access jobs, services and recreation within 30 minutes. The Plan emphasises locating new housing within established centres and near public transport to maximise infrastructure efficiency and minimise environmental impacts.

The proposal contributes to this vision by delivering housing in a well-connected centre with direct rail and bus access to North Sydney, the Sydney CBD, Parramatta, Macquarie Park and other strategic locations. The redevelopment of the site improves land use efficiency and supports the continued evolution of Gordon as a mixed-use centre.

North District Plan

The North District Plan provides a 20-year framework for growth across Sydney's northern local government areas. It identifies the need to accommodate additional housing within centres that have capacity to support growth through existing infrastructure and transport networks.

The proposal responds to the relevant Planning Priorities by:

- supporting increased residential density within a centre close to public transport;
- enhancing housing diversity, including the provision of affordable housing; and
- reinforcing Gordon's role within the district's network of centres.

Ku-ring-gai Local Strategic Planning Statement

The Ku-ring-gai Local Strategic Planning Statement sets out Council's long-term vision for land use and development across the LGA. The proposal aligns with key priorities relating to:

- locating housing close to transport, services and facilities;
- delivering a diverse range of housing types;
- providing affordable housing; and
- supporting the vitality of Gordon as a local centre.

Future Transport Strategy 2056

The Future Transport Strategy 2056 promotes integrated land use and transport planning to support movement and place outcomes. The site benefits from frequent rail and bus services, walkable access to the station and surrounding services, and opportunities to support active transport.

The proposal is consistent with the objectives of the Strategy by focusing growth in a highly accessible location and by limiting reliance on private vehicle travel through proximity to public transport.

2.3 The Site and Surrounding Context

2.3.1 Site Location

The subject site is located at 810 Pacific Highway, Gordon, within the Ku-ring-gai Local Government Area. The land is legally described as Lot 12 DP 631351 and has an area of 2,357 m². The site occupies a prominent corner location at the intersection of Pacific Highway and Dumaresq Street, Gordon, immediately north of the Gordon Centre and south of the Ku-ring-gai Council chambers.

2.3.2 Site Description

The site previously contained a five-storey commercial office building and associated landscaping, which has been partially demolished in accordance with existing approvals.

The site is zoned **E1 – Local Centre** under the KLEP 2015, permitting a mix of retail, commercial and residential uses consistent with Gordon's role as a centre.

Topography, site levels and key constraints, including slope and relationship to adjoining properties, are illustrated in Figure 3 and described further in the Architectural Design Report (Appendix I).

Figure 3: Subject Site
(source: Pegasus Planning & Advisory & nearmap 2026)

2.3.3 State Significant Development Site Boundary

The SSD site boundary has been defined to include the subject site (Figure 3) and, where relevant, to identify associated interface works. This provides transparency regarding the development context and supports a coordinated assessment of the proposal, without extending the SSD beyond what is required for its proper consideration.

The pedestrian pathway connecting Radford Place and the Pacific Highway between the subject site and the Ku-ring-gai Council Chambers is able to be delivered independently of the SSD, relying on the existing approval, granted under Development Application DA0610/17 (as modified), together with works undertaken wholly within the subject site and shown on the architectural drawings. The SSD does not seek approval for works on Council-owned land without Council consent.

The pedestrian pathway within the SSD site boundary is shown in Appendix O and reflects the preferred design having regard to pedestrian connectivity and CPTED principles. This does not introduce any fundamental changes to the approved design or delivery of the pathway and instead focusses on detailed refinements.

The proponent is committed to continuing constructive engagement with Ku-ring-gai Council throughout the consultation and assessment process to ensure appropriate coordination between the approved pathway and the works proposed within the subject site.

In the absence of any changes arising from the assessment process, the pedestrian pathway within the Council-owned land will be delivered in accordance with Development Application DA0610/17, together with the works proposed in this EIS. This approach ensures certainty for assessment purposes and avoids reliance on future approvals or modifications.

In addition to the land legally described as Lot 12 DP 631351, the SSD site boundary also acknowledges previously approved works located outside the subject site, including paving and awnings. These elements were approved as part of Development Application DA0610/17 and form part of the established and approved development framework for the site and have been integrated into the architectural drawings.

Their identification on the architectural drawings provides context and supports a coordinated assessment of the proposal, particularly in relation to its interface with adjoining public domain areas and as required by the technical reports, including Appendix S – Wind Impact Assessment.

2.3.4 Local Context and Surrounding Development

The site is located within a mixed civic, retail and residential environment. Key surrounding uses include:

- the Ku-ring-gai Council Chambers immediately to the north;
- The Gordon Centre shopping complex to the south;
- established retail and shop-top housing along Pacific Highway to the east; and
- medium and high-density residential development to the west, including land zoned R4 – High Density Residential within close proximity.

Civic and community facilities such as Gordon Library and the Gordon Police Station are also located immediately east of the subject site. Importantly, the site is situated between major civic and commercial landholdings with adopted or potential building heights of approximately 83.5 metres at the Ku-ring-gai Council Chambers site and 109 metres at the Gordon Centre site, reflecting the evolving height context of the Gordon Local Centre and reinforcing the appropriateness of a tall building outcome in this location.

2.3.5 Transport and Accessibility

The site is highly accessible by public and active transport. Gordon Railway Station is located approximately 300 metres from the site and is serviced by the T1 North Shore Line, providing direct connections to major employment centres. Frequent bus services operate along Pacific Highway, connecting Gordon with surrounding suburbs.

Detailed assessment of transport, traffic and parking is provided in Chapter 6 and the Traffic Impact Assessment (Appendix R).

2.4 Cumulative Impacts

The potential for cumulative impacts has been considered in accordance with the Department's Cumulative Impact Assessment Guidelines for State Significant Projects. The surrounding area

includes several approved and proposed developments consistent with the planned growth of Gordon as a centre.

While increased residential density is anticipated over time, the review indicates that the proposal would not result in cumulative impacts that materially exceed the capacity of existing infrastructure, transport networks or services.

In Gordon, nearby SSD proposals considered as part of the cumulative impact assessment are summarised in Table 4 and Figure 4: Nearby Development Proposals.

Table 4: Nearby State Significant Development

Address	Reference number	Description and Status
3A, 3B, 5A and 7 Burgoyne Street and 1 and 3 Pearson Avenue and 4 Burgoyne Lane, Gordon	SSD-82395459	Description: Residential Flat Buildings (x 2) Status: Determined
3-9 Park Avenue and 2 Park Lane Gordon	SSD-78775458	Description: Residential Flat Building with Infill Affordable Housing Status: Determined
1, 23 & 25 McIntosh Street and 55 Werona Avenue, Gordon	SSD-83478456	Description: Residential Development with Infill Affordable Housing Status: Response to submissions
29-33 Rosedale Road and 2A-4 Edward Street, Gordon	SSD-85838457	Description: Residential Development with Infill Affordable Housing Status: Prepare EIS
25-27 Rosedale Road and 1 and 1A Edward Street, Gordon	SSD-85549710	Description: Residential Development with Infill Affordable Housing Status: Prepare EIS
1-7 Carlotta Avenue, Gordon	SSD-64935477	Description: The existing Ku-ring-gai Council Depot Site, Masterplan proposed a new seniors living development for approximately 250 people - state significant development - Housing SEPP 2021 Status: Prepare EIS

Development Applications lodged or determined within 600m of the site, considered as part of the cumulative impact review, are summarised in Table 5.

Table 5: Nearby development proposals

Address	Reference number	Description and Status
34 Dumaresq Street, GORDON NSW 2072	Construction Certificate Application: CCPCA0341/25	Description: Demolition of existing structures and construction of nine townhouses, multi-dwelling housing with basement parking Status: Determined
43 Dumaresq Street, GORDON NSW 2072	Construction Certificate Application: CCPCA0243/25 Development Application: DA0219 22	Description: Demolition of existing structures and construction of a multi-dwelling housing development containing 14 dwellings, basement carparking

There is one planning proposal in Gordon currently being considered by Council. Over the last 5 years, no proponent-led planning proposals have been approved that increase residential or commercial activity in Gordon.

In May 2024, the Government implemented the Transport Oriented Development (TOD) planning policy for areas within 400m of Roseville, Lindfield, Killara and Gordon stations. In response, Council prepared an alternate preferred scenario to the TOD for consideration by the state government, which included amending LEP controls for selected sites in Gordon. The NSW Government published the amended clauses for Ku-ring-gai's TOD Alternative on the NSW Legislation website on 14 November 2025, which included implementing:

- Low- and Mid-Rise Exclusion Maps
- Affordable Housing Map provisions applying to selected Council-owned & private land
- adjustments to floor space ratio and height-of-building maps.

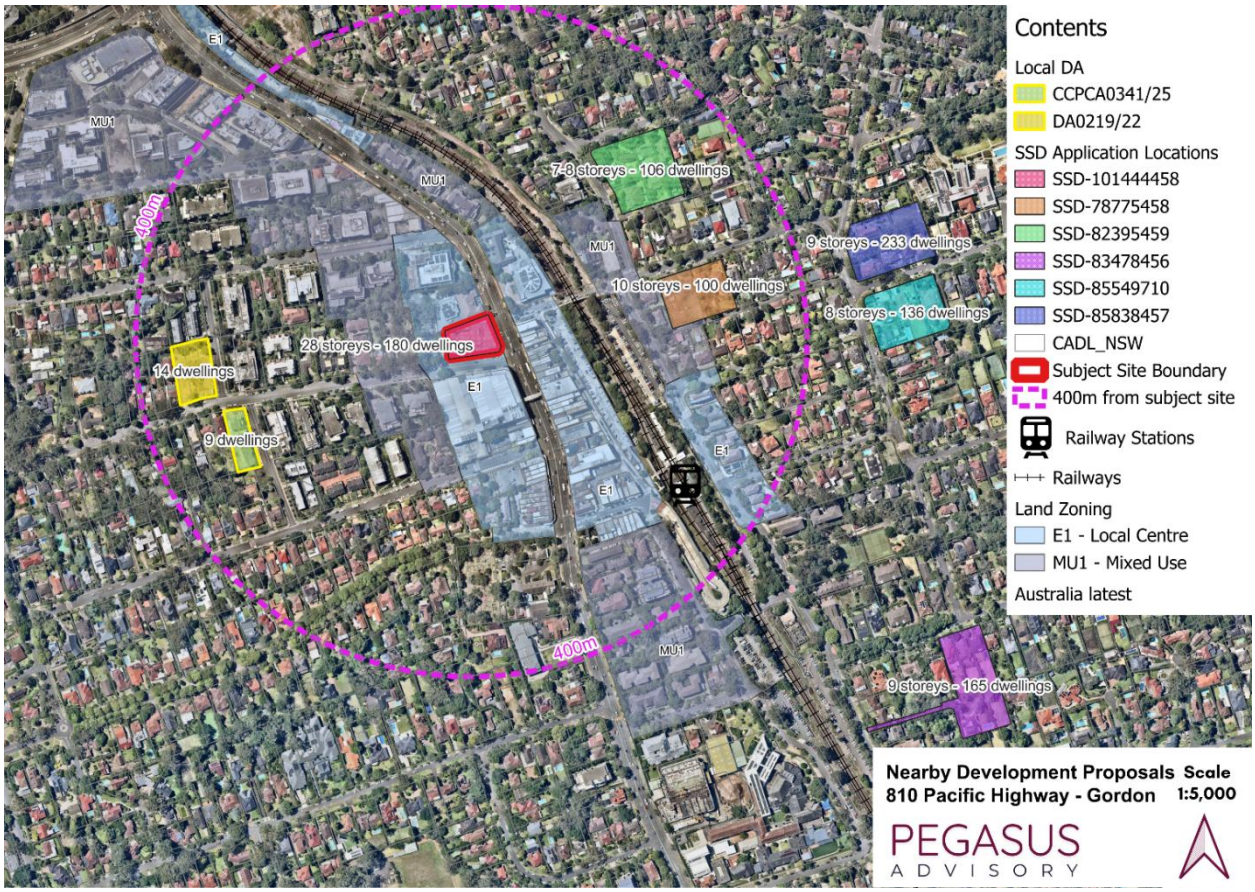

Figure 4: Nearby Development Proposals
(source: Pegasus Planning & Advisory, nearmap, SSD Search and KRC DA Register)

2.5 Agreements with Other Parties

At the time of preparation of this EIS, no voluntary planning agreements or benefit-sharing schemes apply to the proposal.

The Applicant proposes to partner with a Registered Community Housing Provider to manage the affordable housing component of the development in accordance with applicable statutory requirements. A summary of relevant agreements is provided in Table 6, and a copy of the Registered Community Housing Provider with Chief Housing is included in Appendix F.

Table 6: Agreements Summary

Agreement Type	Party	Status	Relevance
Affordable Housing Management	Registered Community Housing Provider – Chief Housing	Letter of Agreement	Affordable Housing Delivery – Housing SEPP & KLEP 2015

2.6 Feasible Alternatives

In accordance with section 192 of the *Environmental Planning and Assessment Regulation 2021* and the State Significant Development Guidelines, feasible alternatives to the proposal have been considered.

The alternatives assessed are summarised in Table 7.

Table 7: Project Alternatives

Options	Description	Outcome	Conclusion
Do Nothing	No redevelopment of the site.	No housing or Gordon Local Centre renewal.	Does not meet strategic objectives.
Approved DA Scheme - Shop-top housing as currently approved under DA0610/17	Development as approved (and modified) under DA0610/17	Lower housing yield, no affordable housing	Missed a strategic opportunity
Proposed SSD Scheme – Alternate SSD Design with Housing SEPP bonus Infill affordable housing.	Mixed-use development within affordable housing	Optimises housing delivery in a highly accessible location	Preferred option.

Detailed economic feasibility analysis supporting the selection of the proposed scheme is provided in the Feasibility & Affordable Housing Assessment (Appendix G).

3 Project Description

3.1 Description of the Proposed Development

This State Significant Development Application (SSDA) seeks consent for the redevelopment of 810 Pacific Highway, Gordon, as a 28-storey mixed-use shop-top housing development comprising 180 residential apartments (including 39 affordable housing apartments), a ground-floor full-line Aldi supermarket, six basement levels, communal open space and associated public domain works.

The proposal is to be assessed as State Significant Development.

The site is currently subject to Development Consent DA0610/17 (Appendix LL), granted on 12 December 2018 by the Sydney North Planning Panel for a 7-storey mixed-use development comprising 55 residential apartments, a ground-floor ALDI supermarket and three basement levels. That consent has been modified on several occasions, including MOD0061/25, which approved excavation and shoring works to RL107.64m AHD and realignment of the basement walls in the north-eastern corner of the site.

The extent of demolition, excavation, shoring and piling works approved under DA0610/17 to RL107.64m AHD is illustrated in Figure 5.

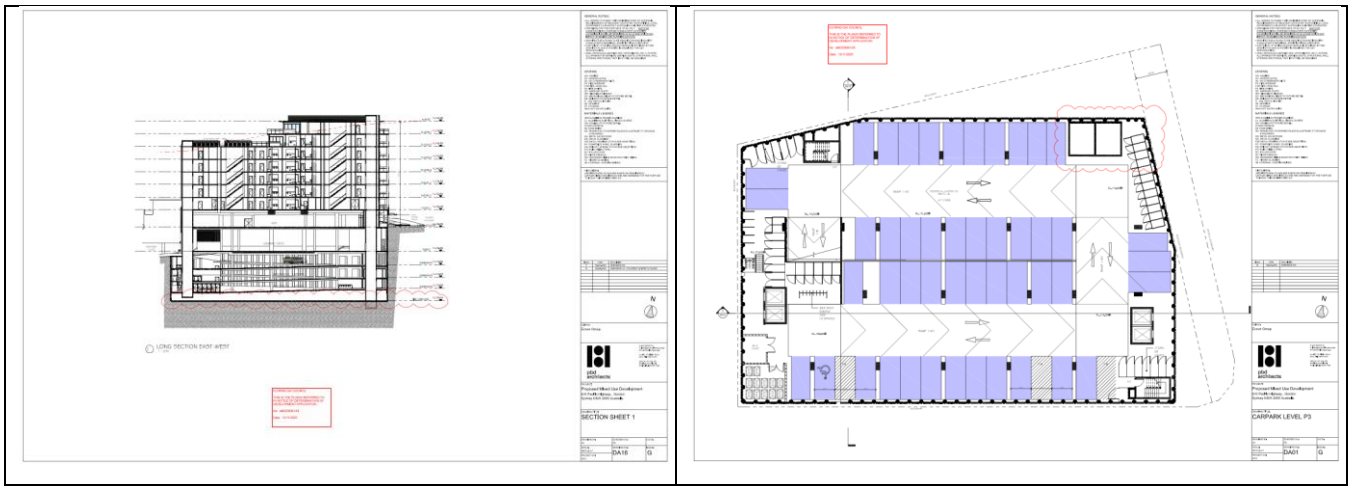

Figure 5: Early Works - demolition, excavation, shoring, and piling works to RL107.64 m AHD
(source: KRC DA Approval – DA0610/17 – MOD0061/25 – Refer also to Appendix LL)

Demolition and excavation works to RL107.64m AHD are approved under DA0610/17 and will be completed pursuant to that consent.

3.1.1 Scope of this State Significant Development Application

This SSDA seeks consent for the following works:

- Completion of excavation, shoring and piling from RL107.64m AHD to RL102.214m AHD;
- Construction of six basement levels for car parking, servicing and plant;
- Construction of a 28-storey mixed-use shop-top housing development comprising:
    - Ground floor ALDI supermarket (1,324.2m² GFA);
    - Level 1 residential lobby, mailroom, resident library, gymnasium, flexible-use space and landscaped communal open space;

- Residential apartments on Levels 2 to 28, with additional communal open space provided on Levels 24 and 26;
- Associated loading dock, waste management and building services infrastructure; and
- Ancillary landscape and public domain works within the site boundary.

The works forming part of this SSDA are illustrated in Figure 6, which identifies excavation beyond RL107.64m AHD and the proposed redevelopment envelope.

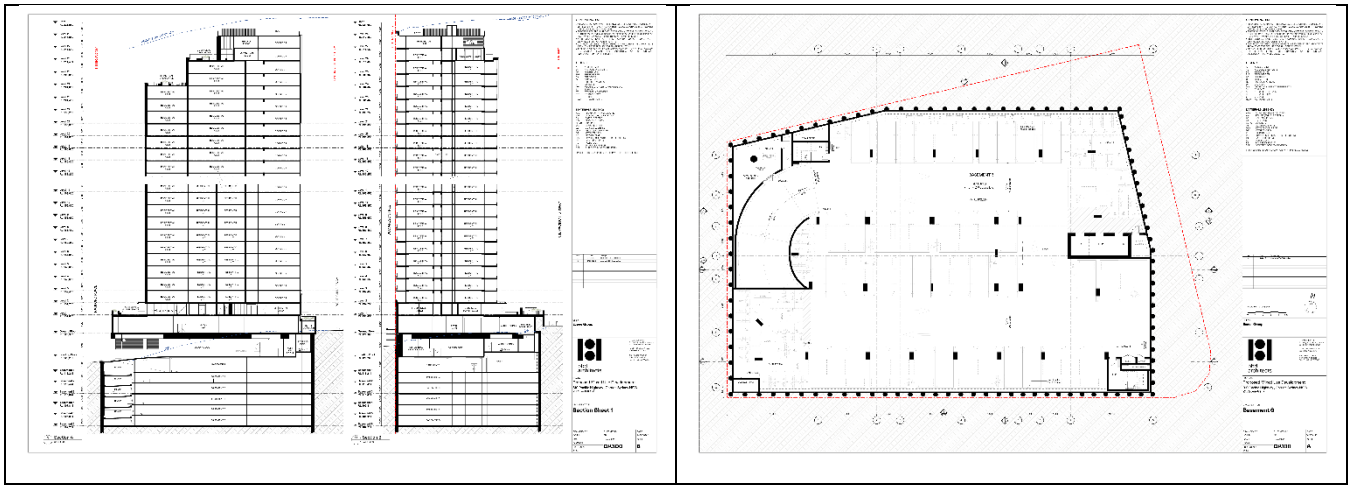

Figure 6: SSDA works - Excavation, shoring, and piling works beyond RL107.64m AHD and Redevelopment
(source: Appendix H - Architectural Drawings)

3.1.2 Works Approved Under DA0610/17

The following works are approved under DA0610/17 and may be completed pursuant to that consent:

- Demolition of existing structures;
- Excavation, shoring and piling to RL107.64m AHD;
- Basement footprint alignment works approved under MOD0061/25.

Should this SSDA be approved, the development consent for DA0610/17 will be modified under section 4.17(1)(b) of the *Environmental Planning and Assessment Act 1979* to give effect to the amended development on the land.

The proposed height and floor space outcomes are the result of a built-form-led design response shaped by site constraints, tower slenderness, setbacks and interface conditions. Where numeric development standards under the KLEP 2015 are exceeded, variations are addressed through Clause 4.6 requests submitted with this application (refer Appendix U and Appendix V).

3.2 Project Overview

provides a comparative summary of the previously approved development and the proposed SSD redevelopment.

Table 8 provides a comparative summary of the previously approved development and the proposed SSD redevelopment.

Table 8: Project Overview

Item	Approved Development Consent (DA0610/17)	State Significant Development Application (SSD-101444458)
Site area	2,357m²	2,357m²
Site Description	Lot 12/DP631351	Lot 12/DP631351
Demolition & Excavation	As per Development Consent (DA0610/17), the site has been partly demolished. MOD0061/25 increased the depth of site excavation to RL107.64m AHD, and realigned the basement walls in the north-eastern corner of the site. The modification also provided amendments to the conditions relating to the issue of the relevant construction certificates.	Increased excavation, shoring and piling works from RL107.64m AHD to RL102.214m AHD.
Land use	Retail/Commercial Development with Shop-top housing	Retail/Commercial Development with Shop-top housing including 39 Infill Affordable Housing units
Gross Floor Area (GFA)	Approved GFA is 7,053.27m^2 and comprises the following: • Residential: 5,329.17m² • Commercial: 1,724.1m² (including storage)	Proposed GFA is 20,836m² and comprises the following: • Residential: 19,512.4m² • Commercial: 1,324.2 m² A minor variation to the GFA (919.95m^2) is requested through a clause 4.6 variation.
Floor Space Ratio (FSR)	3.0:1 3.0 x 2,357m^2 = 7,071m^2	6.5:1 + 30% = 8.45:1 8.45 x 2,357m^2 = 19,916.65m^2 A minor variation to the base FSR is sought pursuant to Clause 4.6 of the KLEP 2015 and is documented in Appendix V. The clause 4.6 variation seeks to increase the base FSR to 6.8:1 (4.6% increase): 6.8:1 + 30% = 8.84:1 8.84 x 2,357m^2 = 20,836m^2
Building Height	26.5m + 0.9m addition through a Clause 4.6 variation	73.5m and applying the Housing SEPP bonus would result in a maximum building height of 95.55m. A minor rooftop encroachment above the permissible height plane is addressed through a Clause 4.6 variation request, provided at Appendix U. The clause 4.6 variation seeks to increase the base maximum building height by 1.25m to 74.75m (1.7% increase): 74.75m + 30% = 97.175m The extent of building volume above the 95.55m height plane is approximately 36m^3, whereas

		approximately 6,388m^3 of potential building volume is located below the height plane.
Storeys	7 residential storeys, Ground Floor Aldi, Loading Dock and 3 basement levels and Basement Fire Tank to RL107.64m AHD	28 residential storeys, Ground Floor Aldi, Loading Dock and 6 basement levels to RL102.214m AHD.
Dwelling number and mix	56 residential units reduced to 55 residential units (MOD0222-20) including: • 55 standard dwellings (100%) • 0 affordable units (0%) Approved apartment mix: • 8 one bedroom (14.5%) • 39 two bedroom (71%) • 8 three bedroom (14.5%)	180 residential units including: • 141 standard dwellings (78.3%) • 39 affordable units (21.7%) Proposed Apartment mix: • 44 one bedroom (24%) • 76 two bedroom (42%) • 57 three bedroom (32%) • 3 four bedroom (2%)
Infill Affordable Housing (SEPP) – minimum 15 years	N/A	15% of total GFA applying the Infill Bonus provisions of the Housing SEPP: 30 apartments - 2,987.1m² GFA (minimum required 2,987m^2) Apartment mix: • 7 one bedroom (25.6%) • 19 two bedroom (61.5%) • 4 three bedroom (12.9%)
Council Affordable Housing target (LEP) – in perpetuity	N/A	10% of residential GFA uplift under the KLEP 2015: 825.1m² GFA (minimum required 825m^2) Apartment mix: • 3 one bedroom (25.6%) • 5 two bedroom (61.5%) • 1 three bedroom (12.9%)
Communal open space	Provided via a landscaped area on level one and a rooftop terrace. Total 454m^2	Provided outdoor open space at ground level, level 24 and 26 for residents. The proposal also includes an indoor communal space on Level 1 Total 731m²
Car Parking	137 car parking spaces over three levels of basement including: • 68 car parking spaces associated with the Commercial / Retail • 59 associated with the residential apartments, • 9 visitor spaces and 1 car share	269 car parking spaces provided over six levels of basement parking, comprising: • 137 car parking spaces associated with the existing approved development under DA0610/17. • 118 car parking spaces for the additional residential apartments, calculated in accordance with Housing SEPP for affordable and market housing.

		• 14 visitor car parking spaces for market apartments, calculated at a rate of 1 space per 6 dwellings in accordance with KLEP 2015. Total car parking provision: 269 spaces.
Deep soil and landscape area	Deep soil planting areas of 162m^2 are provided on site.	Deep soil planting areas of 259m^2 are provided on site.
Indicative construction hours	7am to 5pm (Monday to Saturday) 8am to 3pm (Saturday). No work on Sundays and Public Holidays	7am to 5pm (Monday to Saturday) 8am to 3pm (Saturday). No work on Sundays and Public Holidays. No Vehicle access or egress from the Pacific Highway – unless approved by TfNSW, and the previous construction traffic management plans are replaced by this SSD.
Estimated Development Cost (EDC)	$31,656,142 (2017)	$142,593,629 (2026)

3.3 Project Area

The project is located at 810 Pacific Highway, Gordon, on land described as Lot 12 DP 631351, within the Gordon Town Centre. The site has an area of 2,357 m² and is bounded by:

- Pacific Highway to the east;
- Dumaresq Street to the south;
- Radford Place to the west; and
- the Ku-ring-gai Council Chambers to the north.

3.3.1 Project Area and Disturbance

The project area comprises the subject allotment only. No additional land is required for buffers, offsets or ancillary works outside the site boundary.

The area of disturbance includes:

- the full site footprint for basement excavation (six basement levels);
- the above-ground building footprint;
- areas required for construction staging, temporary works and services connections; and
- landscape and public domain works within the site boundary.

Basement excavation and shoring works have already commenced under DA0610/17, as amended by MOD0061/25 to RL107.64m AHD, with the balance of works forming part of this SSDA.

3.3.2 Environmental Constraints

The site:

- is not flood-prone, including under PMF and climate change scenarios;

- does not contain biodiversity values or threatened ecological communities;
- does not include any identified Aboriginal or non-Aboriginal heritage items within the site boundary, noting the proximity of nearby heritage items which have been assessed in Chapter 6.13;
- does not include geotechnical conditions that would preclude development, noting that specialist design responses are required to manage deep excavation, groundwater and dewatering during construction; and
- is not affected by bushfire or coastal hazards that would preclude development.

3.4 Physical Layout and Design

3.4.1 Overall Layout

The proposed development comprises a 28-storey mixed-use shop-top housing building (Appendix H & Appendix I) arranged over a podium and tower form above 6 basement levels. The layout includes:

- a ground-level retail floor plate occupied by an Aldi supermarket and small retail/commercial facilities;
- a podium containing resident facilities and communal open space;
- a slender residential tower above the podium; and
- basement levels accommodating car parking, servicing and building plant.

The physical layout has been designed to respond to:

- the site's constrained dimensions;
- adjoining public buildings and streets;
- solar access and wind considerations;
- tower slenderness and separation outcomes; and
- efficient integration of residential, retail and servicing functions.

3.4.2 Built-In Mitigation Measures

Mitigation measures integrated into the physical design include:

- building setbacks and articulation to reduce bulk and overshadowing impacts;
- podium-level and upper-level communal open spaces to offset density;
- acoustic treatment and building orientation to manage noise;
- façade articulation and material selection to reduce visual impacts; and
- landscape design, deep soil zones and soil-on-structure systems to enhance urban canopy.

All building setbacks are clearly dimensioned from the site boundaries on the architectural drawings (Appendix H), with existing and proposed natural ground levels identified at key interfaces and along all site frontages to enable a clear understanding of level changes, built-form siting and potential amenity impacts. The proposal provides a minimum 4-metre setback to the Pacific Highway to accommodate any potential future road widening beyond land already acquired, noting that Transport for NSW has not identified any current need for additional widening. A minimum setback of 3 metres is provided to Radford Place, with increased tower setbacks of up to 12 metres to the adjoining Council-owned site.

3.4.3 Crime Prevention Through Environmental Design

A Crime Prevention Through Environmental Design (CPTED) Assessment has been prepared for the proposed development and is provided at Appendix BB. The assessment has been undertaken in

accordance with the NSW Police CPTED Guidelines and Crime Prevention and the Assessment of Development Applications (2001) and evaluates the design and management of public and semi-public spaces associated with the proposal.

The CPTED Assessment confirms that the development incorporates key CPTED principles relating to surveillance, access control, territorial reinforcement and activity and space management. These principles are embedded within the design through measures including active ground-floor uses, clear delineation between public, semi-public and private areas, strong visual connections between building interfaces and surrounding streets, and defined responsibilities for the ongoing management of publicly accessible areas.

Subject to the implementation of the recommendations outlined in the CPTED Assessment, the proposed development is considered to present a low crime and safety risk and to contribute positively to perceptions of safety within the Gordon Town Centre.

3.4.4 Ancillary Infrastructure

Approval is sought for all infrastructure necessary to support the development, including:

- new and amplified stormwater, sewer and water connections;
- on-site detention and stormwater quality treatment;
- basement access from Radford Place;
- waste management and loading dock infrastructure; and
- minor public domain works adjacent to the site.

3.4.5 Design Parameters and Permitted Change

The following elements may be refined at the detailed design stage without requiring further modification, provided consistency with the approved envelopes and impacts is maintained:

- internal apartment layouts and minor changes to unit mix;
- façade articulation, materials and colour palette;
- detailed landscape species selection;
- building services coordination and plant layouts; and
- internal circulation and back-of-house arrangements.

Any changes outside these parameters would be subject to further assessment in accordance with the EP&A Act.

3.5 Uses and Activities

3.5.1 Land Uses

The development is characterised as a **mixed-use retail and residential development** comprising:

- residential apartments (including affordable housing);
- a full-line supermarket;
- ancillary retail / back-of-house uses; and
- communal residential amenities.

3.5.2 Activities

Activities undertaken on site include:

- residential occupation and day-to-day living activities;
- retail trading and servicing activities;
- building management, waste collection and deliveries;
- use of communal indoor and outdoor resident facilities; and
- parking and vehicular access activities within basement levels.

3.5.3 Scale and Intensity

The scale and intensity of activities reflect the site's location within a strategic centre and is consistent with transit-oriented and centre-based development outcomes envisaged by the State.

3.6 Ecologically Sustainable Development

The project has been designed in accordance with the principles of **Ecologically Sustainable Development (ESD)** as defined in Section 6(2) of the *Protection of the Environment Administration Act 1991*, through the integration of environmental, social and economic considerations.

Key ESD outcomes include:

- efficient use of land within an established centre, reducing urban sprawl;
- delivery of significant affordable housing in a highly accessible location;
- energy-efficient, all-electric building services and on-site solar generation;
- integrated water management, including rainwater reuse and stormwater treatment;
- waste minimisation, reuse and recycling strategies; and
- enhancement of urban canopy, landscape and resident amenity.

An assessment of the environmental, social and economic impacts arising from the application of these Ecologically Sustainable Development principles is provided in Chapter 6 of this EIS and Appendix W - ESD Report.

3.7 Timing, Stages, and Sequencing

3.7.1 Project Phases

The project will be delivered in the following phases:

1. **Early Works (Approved)**
    - demolition, excavation, shoring and piling under DA0610/17 (MOD0061/25) to RL107.64m AHD.

2. **Construction Phase (This SSDA)**
    - completion of excavation, shoring and piling to RL102.214m AHD.
    - construction of basement works;
    - construction of podium, tower and superstructure;
    - installation of services, façade, landscaping and public domain works'
    - The construction phase will generate approximately 308 direct jobs.

3. **Operational Phase**
    - occupation of retail and residential components;
    - ongoing building management and maintenance;
    - The operational phase will support approximately 135 ongoing jobs.

No decommissioning or rehabilitation phase is proposed, given the permanent nature of the development.

3.7.2 Sequencing

Construction will generally proceed from:

- basement completion → podium construction → tower construction → façade and fit-out → commissioning and occupation.

Retail delivery will be staged to ensure the Aldi supermarket is operational by late 2028, consistent with contractual obligations, with residential occupation to follow completion.

A simplified staging and sequencing diagram is provided in the architectural drawing package (Appendix H) and will be referenced for impact assessment purposes in Chapter 6.

3.8 Project Summary

The modified development the subject of this SSDA retains the mixed-use retail and residential character of the previously approved scheme, including the Aldi supermarket and basement access strategy, while responding to the evolved strategic planning framework for the Gordon Town Centre. The proposal introduces increased housing supply, including significant affordable housing, and a revised built form consistent with the Housing SEPP infill affordable housing provisions.

4 Statutory Context

This chapter describes the statutory planning framework for the proposed development and identifies the relevant State and local legislation and planning instruments applying to the State Significant Development Application (SSDA).

Key appendices for this chapter include:

- **Appendix A – SEARs Compliance Table**, identifying where each SEAR is addressed in the EIS, supporting technical reports or accompanying application documentation.
- **Appendix B – Statutory Compliance Table**, identifying applicable statutory requirements and where they are addressed in the EIS or supporting reports.
- Error! Reference source not found.**Appendix E – Amending DA Conditions Table**, identifying existing consent conditions and whether they are retained, complied with or proposed to be amended as part of this SSDA.

4.1 Statutory Framework

The following legislation and planning instruments are relevant to the assessment of the proposal:

- Environmental Planning and Assessment Act 1979 (EP&A Act)
- Environmental Planning and Assessment Regulation 2021 (EP&A Regulation)
- *Biodiversity Conservation Act 2016* (as applicable, including BDAR waiver considerations)
- State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP)
- State Environmental Planning Policy (Housing) 2021 (Housing SEPP)
- State Environmental Planning Policy (Sustainable Buildings) 2022
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015)
- Apartment Design Guide (ADG)

4.2 Power to Grant Approval

4.2.1 Environmental Planning and Assessment Act 1979 (EP&A Act)

This application is made under Part 4, Division 4.7 of the EP&A Act, as the proposal is declared to be State Significant Development.

The EIS has been prepared in accordance with the EP&A Regulation and addresses the requirements set out in the SEARs issued on 9 December 2025 for SSD-101444458 (Appendix A).

This EIS has been certified by a Registered Environmental Assessment Practitioner (REAP).

4.2.2 Planning Systems SEPP – Declaration of State Significant Development

The proposal is declared to be State Significant Development under the Planning Systems SEPP, which identifies classes of development as SSD where specified criteria are met.

In particular, the proposal meets the SSD criteria for infill affordable housing on the basis that it:

- is located within the Eastern Harbour City;
- has a residential component with an Estimated Development Cost (EDC) exceeding $75 million; and
- does not involve development that is prohibited under an applicable environmental planning instrument.

The EDC is confirmed in the EDC Letter (Appendix L).

4.2.3 Housing SEPP – Infill Affordable Housing SSD Pathway

The proposal also satisfies the infill affordable housing pathway under Housing SEPP Chapter 2, Part 2, Division 1, as it provides at least 15% of total gross floor area (GFA) as affordable housing, to be managed by a registered Community Housing Provider (CHP) for a minimum of 15 years.

A summary of the statutory pathway and key clauses is provided in Table 9.

Table 9: Power to Grant Approval – Housing SEPP Infill Affordable Housing Pathway

Statutory Reference	Requirement	Response
Housing SEPP – cl 15C	Division applies where residential development is permitted with consent, AH ≥10%, and development is in an accessible area	Shop-top housing is permitted with consent in the E1 zone; AH ≥15% proposed; site within 800m walking distance of Gordon Station.
Housing SEPP – cl 16	Allows up to 30% FSR bonus where minimum Affordable Housing is provided	Bonus applied and AH calculated in accordance with DPHI Practice Note methodology.
Housing SEPP – cl 18	Allows a corresponding height bonus aligned with FSR bonus	Height outcome addressed in Design Report and permissibility assessment.
Housing SEPP – cl 21	Affordable Housing must be managed by a Registered CHP for at least 15 years	Registered CHP arrangement in place; details provided in Section 4.4 and Appendix F.

4.3 Permissibility under the Ku-ring-gai LEP 2015

This section identifies relevant KLEP 2015 provisions affecting permissibility and the extent to which the proposal is consistent with those provisions. A summary is provided in Table 10.

Table 10: Ku-ring-gai LEP 2015 Permissibility

Statutory Reference	Control	Comment
Part 2 Permitted or prohibited development Part 2		
KLEP 2015 – Zone E1 Local Centre	Permissibility	Shop-top housing and retail uses are permitted with consent.
Part 4 Principal development standards		
cl 4.3	Height of buildings	Height addressed having regard to LEP standard and Housing SEPP bonus provisions (refer Chapter 3 and Appendix I - Architectural Design Report)
cl 4.4	Floor Space Ratio	FSR addressed having regard to LEP standard and Housing SEPP bonus provisions (refer Chapter 3 and Appendix I - Architectural Design Report)
cl 4.5	Calculation of FSR	Compliance and calculations provided in Chapter 3 and Appendix I - Architectural Design Report
cl 4.6	Exceptions to development standards	Clause 4.6 variation requests are submitted in respect of Clauses 4.3 (Height of Buildings) and 4.4 (Floor Space Ratio). The written requests are provided at Appendix U and Appendix V.
Part 5 Miscellaneous provisions		
cl 5.10	Heritage conservation	Site not a heritage item nor within HCA; nearby heritage context addressed in Historical Archaeological Assessment (Appendix M)
cl 5.21	Flood planning	The site is not flood affected.
Part 6 Additional local provisions		
cl 6.1	Acid sulfate soils	ASS class identified; management requirements addressed in supporting reports
cl 6.2	Earthworks	Earthworks implications addressed (refer to Chapter 3 and existing approvals)
cl 6.6	Residential flat building requirements	Site dimensions satisfy minimums
cl 6.7	Active street frontages	Ground-floor supermarket and retail activation support objectives
cl 6.14	Affordable housing	Addressed in Section 4.5

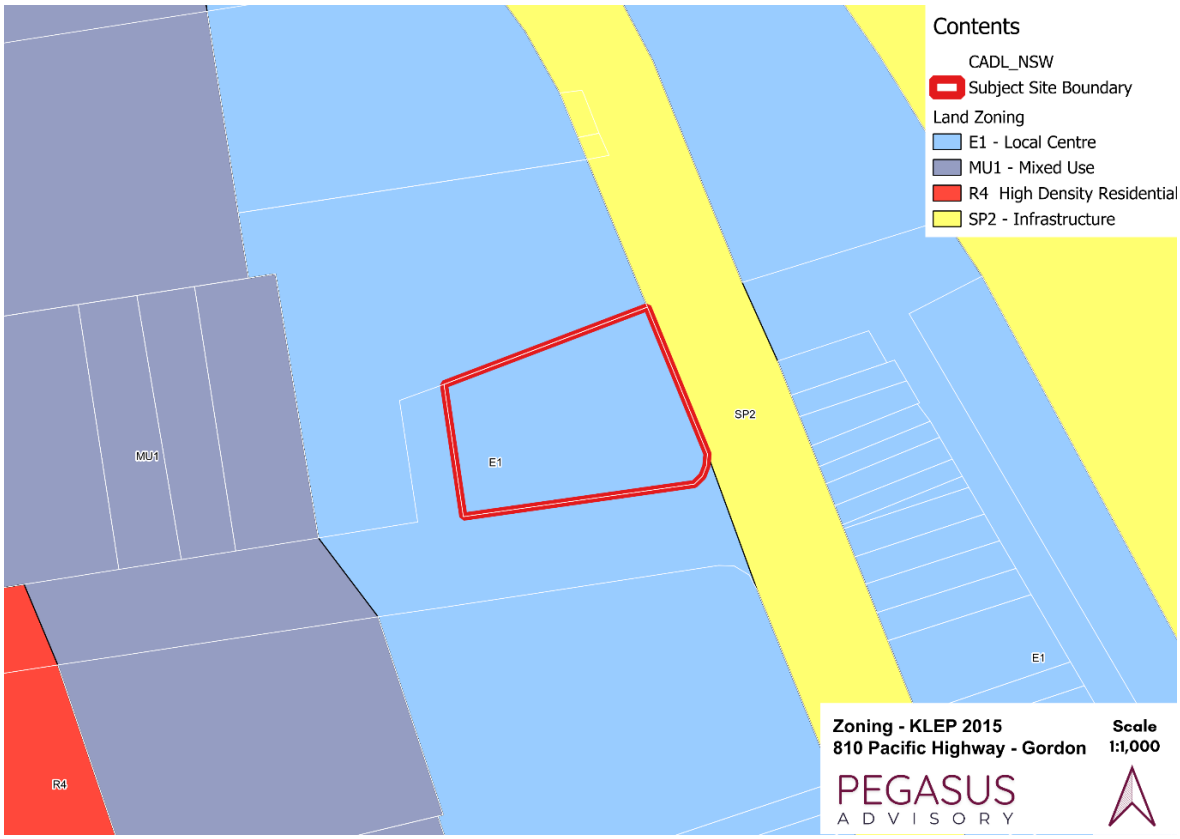

Figure 7: KLEP 2015 - Land Zoning Map
(source: Pegasus Planning & Advisory & NSW Planning Portal 2026)

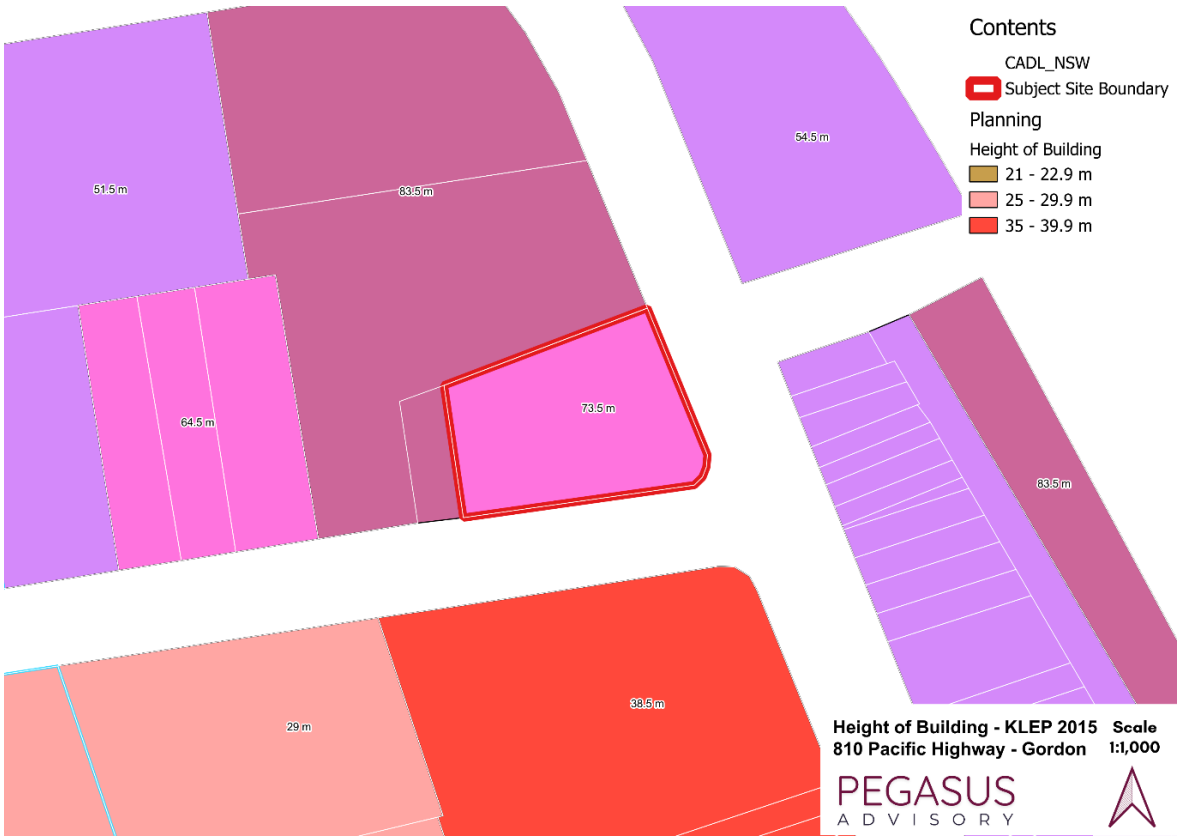

Figure 8: KLEP 2015 - Height of Building Map
(source: Pegasus Planning & Advisory & NSW Planning Portal 2026)

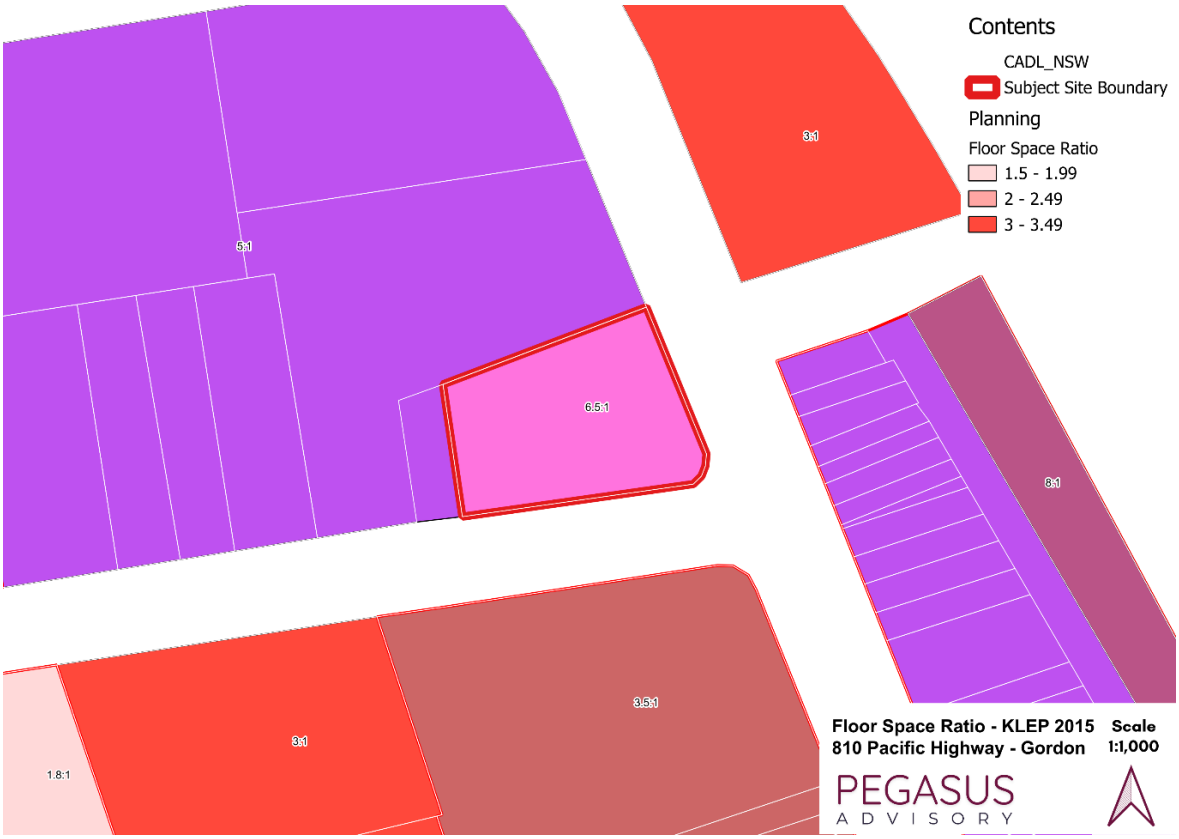

Figure 9: KLEP 2015 - Floor Space Ratio Map
(source: Pegasus Planning & Advisory & NSW Planning Portal 2026)

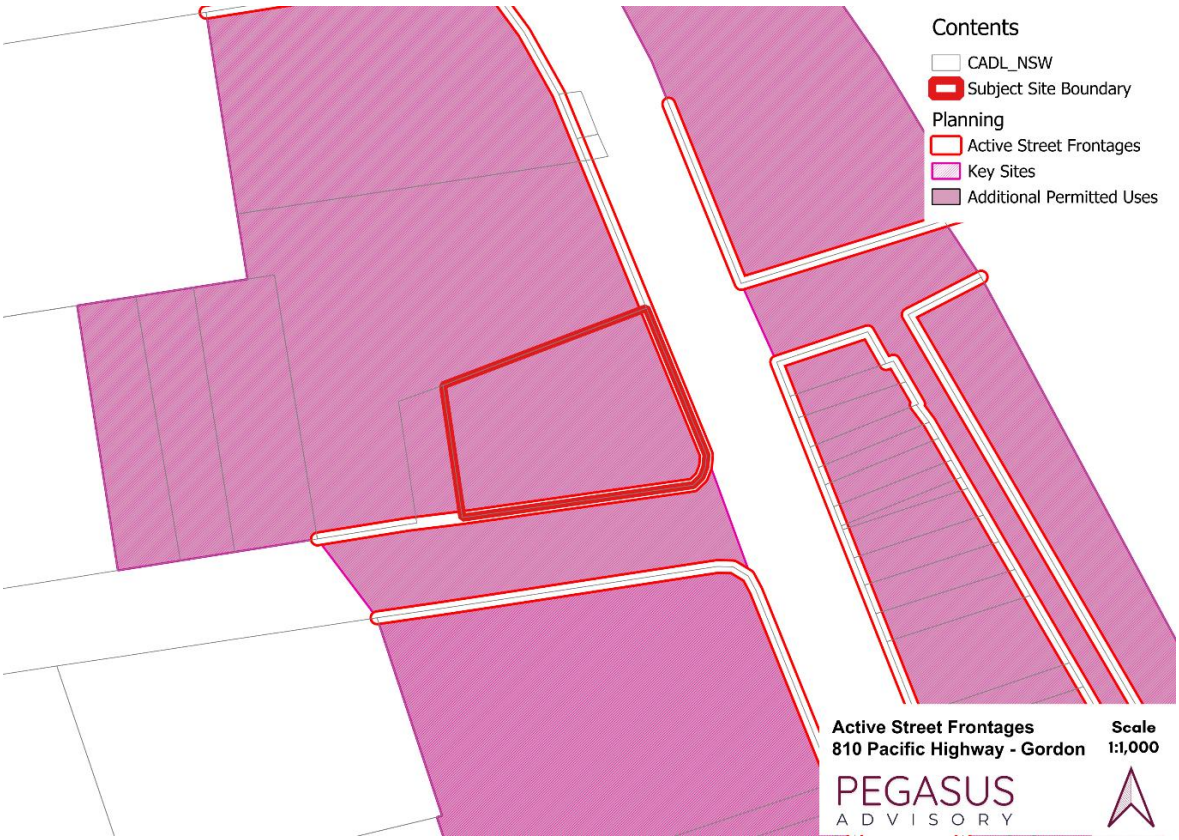

Figure 10: KLEP 2015 - Active Street Frontage Map
(source: Pegasus Planning & Advisory & NSW Planning Portal 2026)

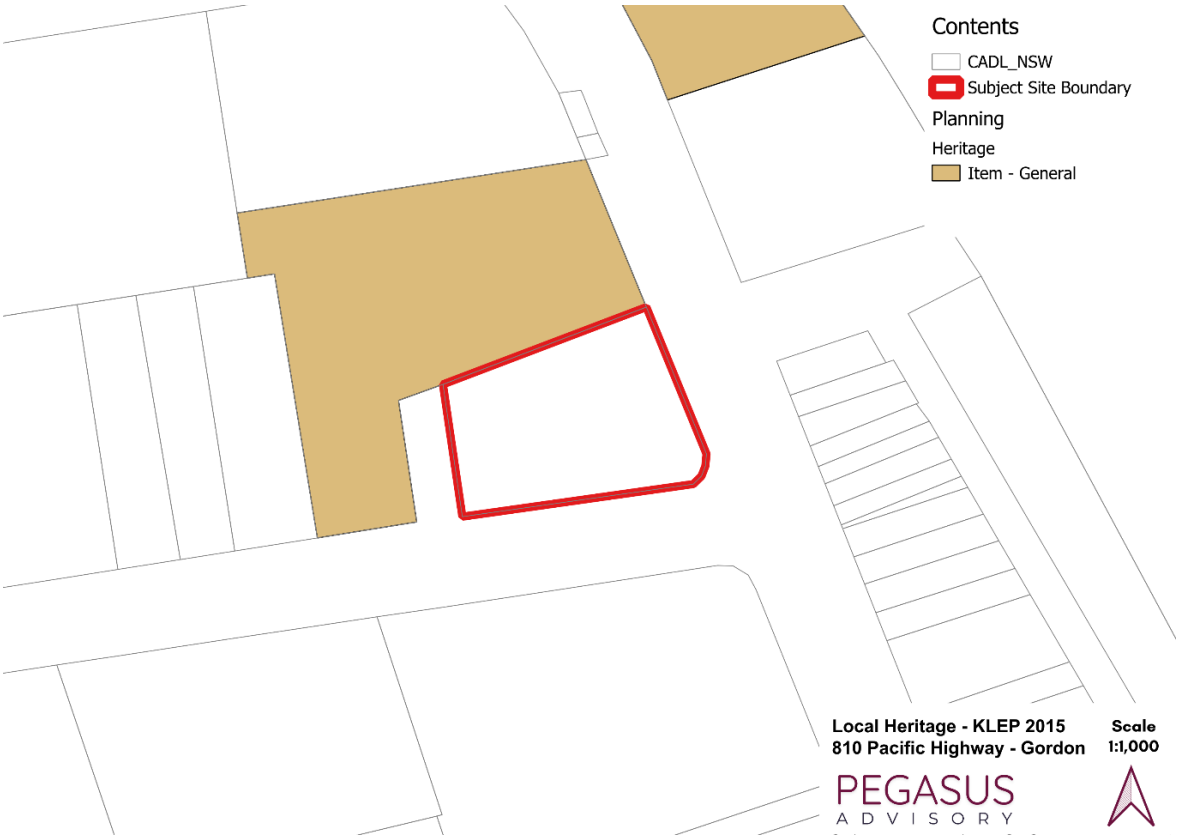

Figure 11: KLEP 2015 - Heritage Map
(source: Pegasus Planning & Advisory & NSW Planning Portal 2026)

Figure 12: KLEP 2015 – Affordable Housing Contribution Scheme & Rates
(source: Pegasus Planning & Advisory, nearmap & NSW Planning Portal 2026)

4.4 Exceptions to Development Standards – Clause 4.6

The proposed development seeks variations to the following development standards of the KLEP 2015 under Section 16(1) of the Housing SEPP:

- Clause 4.3(2) – Height of Buildings
- Clause 4.4(2) – Floor Space Ratio

These development standards are not excluded from the operation of Clause 4.6 of the KLEP 2015. Separate written requests addressing the matters in Clause 4.6(3) and (4) accompany this EIS and are provided as:

- Appendix U – Clause 4.6 Variation Request (Building Height)
- Appendix V – Clause 4.6 Variation Request (Floor Space Ratio)

To avoid unnecessary duplication, the detailed Clause 4.6 assessment is not repeated within the body of this EIS. The environmental, amenity and built-form implications of the proposed height and floor space outcomes are assessed in Chapters 3 and 6 of this EIS and demonstrate that the proposal results in acceptable environmental and planning outcomes.

The consent authority's satisfaction of clause 4.6 is not displaced by the Housing SEPP, but operates concurrently, informed by the strategic and public benefits delivered.

4.5 Affordable Housing Framework and Viability Assessment

Affordable housing delivery is a central consideration in assessing this SSDA. This section addresses:

- the interaction between the Housing SEPP infill affordable housing provisions and KLEP 2015 clause 6.14; and
- the findings of the Feasibility & Affordable Housing (Appendix G) that inform a deliverable and proportionate affordable housing outcome.

This section also responds to the additional matter raised in the Industry-Specific SEARs Cover Letter dated 9 December 2025, requiring demonstration of how the local affordable housing contribution under KLEP clause 6.14 will be provided in addition to Housing SEPP affordable housing.

4.5.1 Applicable Statutory Framework

The following instruments govern affordable housing for the proposed development:

- Housing SEPP, Chapter 2, Part 2, Division 1 – Infill Affordable Housing; and
- KLEP 2015, Clause 6.14 – Affordable Housing.

The affordable housing framework for the proposed development is governed by the interaction of the Housing SEPP and the KLEP 2015. The affordable housing requirement under Chapter 2, Part 2, Division 1 of the Housing SEPP operates as a jurisdictional gateway to the State Significant Development pathway and cannot be treated as satisfying or displacing local affordable housing objectives.

Clause 6.14 of the KLEP 2015 operates concurrently, but on a discretionary basis, and must be applied in a manner that is reasonable, proportionate and informed by feasibility and deliverability considerations, consistent with section 4.15 of the *Environmental Planning and Assessment Act 1979*.

4.5.2 Housing SEPP - Infill Affordable Housing

The proposed development seeks to utilise the infill affordable housing provisions of the Housing SEPP, including:

- a floor space ratio (FSR) bonus of up to 30%, and
- a corresponding height of building bonus,

In exchange for the delivery of a minimum of 15% of the total gross floor area (GFA) as affordable housing, to be managed by a Registered Community Housing Provider for a minimum period of 15 years.

The proposal satisfies the Housing SEPP pathway criteria because it:

- involves shop-top housing permitted with consent under the KLEP 2015;
- provides more than 15% affordable housing by GFA; and
- is located within an accessible area within 800 metres walking distance of Gordon Railway Station.

Affordable housing GFA and bonus calculations have been undertaken consistent with the Department's *Infill Affordable Housing Practice Note* (2023). Applying the Practice Note methodology, the Housing SEPP affordable housing GFA allocation is 2,987.5 m² (being 15% of the total permissible GFA generated by the Housing SEPP bonus). Supporting calculations are provided in Table 11.

Table 11: Housing SEPP Methodology – Affordable Housing GFA Calculation

Item	Value
Site Area	2,357m^2
KLEP 2015 FSR	6.5:1
Base Permissible GFA	15,320.5m^2
Housing SEPP FSR Bonus	Up to 30%
Total GFA with bonus	19,916.65m^2
Affordable Housing Requirement	15%
Affordable Housing GFA	2,987.5m^2

4.5.3 Ku-ring-gai LEP 2015 - Clause 6.14

Clause 6.14 of the KLEP 2015 establishes a local affordable housing contribution framework and identifies the subject site as having a 10% affordable housing target on the Affordable Housing Map.

Clause 6.14(5) provides that the consent authority may impose a condition requiring an affordable housing contribution equivalent to the mapped percentage of residential GFA. The discretionary language requires a reasoned approach that considers feasibility, deliverability and the broader statutory context, including the Housing SEPP contribution, which applies as a precondition to the SSD pathway.

The affordable housing principles under clause 6.14(1) are addressed by:

- provision of affordable housing managed by a registered Community Housing Provider;
- rental settings capped in accordance with statutory requirements;

- delivery of dwellings of equivalent quality, amenity and environmental performance to market dwellings.

Table 12: Alignment with Ku-ring-gai Affordable Housing Principles

Principle	Response
Diverse income groups	Affordable housing delivered within Gordon centre
Rent not exceeding 30% of income	Managed by CHP in accordance with affordability settings
Continued use as affordable housing	CHP management framework and consent conditions
Use of rent/disposal proceeds by Council	Noted: CHP management and reporting arrangements to be addressed via conditions
Equivalent dwelling standard	Affordable dwellings designed to consistent performance and amenity standards

4.5.4 Feasibility and Viability Assessment – Detailed Overview

A comprehensive Feasibility and Affordable Housing Assessment has been prepared to evaluate the economic viability of the proposed development and inform an appropriate affordable housing outcome. Given the determinative nature of affordable housing viability to this application, the key findings are summarised below, with full details provided in Appendix G.

The assessment adopts a transparent, open-book methodology and incorporates:

- a detailed review of statutory and policy settings;
- development scheme assumptions aligned with the proposed design;
- construction cost verification via a detailed Estimated Development Cost (EDC) report (Appendix L) prepared by Newton Fisher Group (17 November 2025);
- independent market valuations prepared by CBRE, M3 Property and Cushman & Wakefield; and
- scenario-based feasibility testing.

4.5.4.1 Site-Specific Cost Drivers

The assessment identifies a series of exceptional site-specific constraints that materially elevate development costs, including:

- deep basement excavation with extensive rock removal;
- permanent dewatering requirements due to groundwater and flood risk;
- relocation and coordination of high-voltage Ausgrid infrastructure;
- constrained construction access and traffic management on the Pacific Highway; and
- delivery of a public east–west pedestrian connection between the Pacific Highway and Radford Place

Adjusted construction costs are estimated at $142.6 million (exclusive of GST), excluding escalation, contingencies, and professional fees.

4.5.4.2 Revenue Evidence

Independent valuation advice converges on achievable residential sales rates of $15,500–$16,500/m^2 of Net Saleable Area (NSA). These rates are supported by transactional evidence from Gordon and Pacific Highway-fronting developments and are materially lower than comparable centres such as Lindfield or St Leonards due to locational and market factors.

4.5.4.3 Feasibility Outcomes

The assessment demonstrates that cumulative affordable housing obligations applied beyond site-specific feasibility thresholds materially undermine project viability. Scenarios applying the full Council affordable housing target to the total residential GFA yield project returns significantly below the minimum thresholds typically required by lenders and equity partners for a high-risk, transit-oriented development.

Importantly, the assessment demonstrates that exceeding feasible affordable housing thresholds does not improve affordable housing outcomes. Instead, it materially increases the risk of the project not being delivered, or delivered in its current approved form, resulting in the loss of both market and affordable housing supply. In this context, the discretionary nature of cl 6.14 in the KLEP 2015 must be considered in the context of an affordable housing contribution that is proportionate and deliverable to achieve the statutory objective of additional market and affordable housing supply.

4.5.5 Affordable Housing Quantum and Delivery Outcome

The affordable housing outcome proposed under this SSDA comprises:

- Housing SEPP requirement:
  15% of total GFA = 2,987.5m²
- KLEP 2015 Clause 6.14 contribution, applied proportionately to the uplift between the approved development (FSR 3.0:1) and current controls (FSR 6.5:1):
  10% of GFA uplift (8,250m^2) = 825m²

Total affordable housing GFA being delivered: 3,812.7m² (2987.6m^2 + 825.1m^2), equating to 39 affordable dwellings, comprising:

- 10 x 1 bedroom (7 Housing SEPP + 3 KLEP 2015)
- 24 x 2 bedroom (19 Housing SEPP + 5 KLEP 2015)
- 5 x 3 bedroom (4 Housing SEPP + 1 KLEP 2015)

All affordable housing will be managed by a Registered Community Housing Provider with 2987.6m^2 of Affordable Housing managed for a minimum of 15 years in accordance with the Housing SEPP (30 apartments) and 825.1m^2 managed in perpetuity (9 apartments).

A summary of the combined affordable housing outcome is provided in Table 13.

Table 13: Total Affordable Housing GFA

Control	Affordable Housing GFA Requirement (m^2)	Affordable Housing GFA Provided (m^2)	Composition
Housing SEPP: 15% affordable housing of the total GFA (Minimum 15 years)	2,987.5m^2	2,987.6m^2	7 x 1 bedroom 19 x 2 bedroom 4 x 3 bedroom
KLEP 2015: 10% affordable housing on uplift	825m^2	825.1m^2	3 x 1 bedroom 5 x 2 bedroom 1 x 3 bedroom

from approved development (in perpetuity)			
Total	**3,812.5m²**	**3,812.7m²**	**39 apartments**

4.5.6 Conclusion on Affordable Housing

The proposed development delivers a substantial and demonstrable affordable housing outcome in a highly accessible centre location. The application of both State and local affordable housing provisions has been carefully considered, informed by robust, site-specific feasibility evidence.

The proposed affordable housing outcome represents a deliverable and proportionate response to statutory objectives, avoids non-delivery risks associated with infeasible cumulative obligations, and satisfies the Industry-Specific SEARs requirement that local affordable housing contributions be addressed in addition to the Housing SEPP affordable housing requirement.

4.6 Car Parking

4.6.1 Statutory Framework

Car parking for the proposed development is governed by the following statutory and policy framework:

- Housing SEPP, including the infill affordable housing provisions; and
- Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015).

Under the Housing SEPP infill affordable housing pathway, residential car parking rates are prescribed by the SEPP and take precedence over local development control plan parking rates. Council development control plan provisions are not determinative for SSDAs and do not override the application of State Environmental Planning Policies.

4.6.2 Existing Approved Car Parking

Development Consent DA0610/17 (as modified) approved the provision of 137 car parking spaces across three basement levels to service:

- the ground-floor ALDI supermarket and associated retail uses; and
- 55 residential apartments (as modified) forming the approved shop-top housing development.

These basement works, including excavation, shoring and piling, have been approved and commenced under the existing consent.

4.6.3 Proposed Car Parking Provision

The proposed development provides a total of 269 car parking spaces across six basement levels, comprising:

- 137 car parking spaces associated with the existing approved development under DA0610/17;
- 118 (117.5) car parking spaces for the additional residential apartments proposed under this SSDA, calculated in accordance with the applicable Housing SEPP car parking rates for affordable and market housing; and

14 (14.3) visitor car parking spaces for the additional market apartments, calculated at a rate of 1 space per 6 dwellings, consistent with KLEP 2015.

Table 14 details the breakdown and allocation of car parking included in the proposal.

Table 14: Car Parking Calculations

Bedroom Type	Approved Apartments DA0610/17	Proposed Apartments (SSDA)	Additional Apartments	Affordable Housing Apartments	SEPP Affordable Housing Parking Rate	Market Apartments	SEPP Market Housing Parking Rate	Additional Parking Spaces
1 bedroom	8	44	36	10	0.4	26	0.5	17.0
2 bedroom	39	76	37	24	0.5	13	1.0	25.0
3 bedroom	8	57	49	5	1.0	44	1.5	71.0
4 bedroom	0	3	3	0	1.0	3	1.5	4.5
Total (Residential)	55	180	125	39		86		117.5
Visitor Parking – Market Apartments (1 space per 6 dwellings, KLEP 2015)								14.3
Subtotal – Additional Residential Parking								**131.8**
Add: Existing Approved Parking (DA0610/17)								**137.0**
Total Calculated Car Parking Spaces								**268.8**
Total Car Parking Spaces Provided								**269**

The proposal does not seek an exceedance of Housing SEPP parking rates; the total parking reflects retention of previously approved parking under DA0610/17, plus additional visitor parking associated with the market housing component of the project.

4.6.4 Relationship to the Approved Development

While the overall quantum of car parking has increased in line with the increased residential yield, the proposal:

- retains the same basement access arrangements and servicing strategy approved under DA0610/17;
- does not introduce new vehicular access points or materially alter traffic movements; and
- builds upon basement works already approved.

The provision of additional basement levels and parking spaces represents an intensification of the approved development rather than a fundamental change to its access, servicing or parking strategy, with the additional parking provided at the rate specified in the Housing SEPP and visitor parking for new market apartments consistent with the Ku-ring-gai DCP.

The traffic and parking implications of the proposed development have been assessed in detail in Chapter 6.17 – Transport, Traffic, Parking and Access and the Traffic Impact Assessment (Appendix R).

4.6.5 Green Travel Plan

Green Travel Plan

A comprehensive Green Travel Plan (GTP) has been prepared for the development and is provided at Appendix NN. The Green Travel Plan is an integral component of the site's transport and parking strategy and supports the proposed car parking provision by promoting reduced reliance on private vehicles.

The Green Travel Plan identifies a package of measures to encourage sustainable and active transport choices for residents, employees, and visitors, including walking, cycling, public transport, car sharing, and carpooling. These measures are tailored to the site's highly accessible location within the Gordon Town Centre and its proximity to Gordon Railway Station and frequent bus services.

The Green Travel Plan establishes clear objectives, mode-share targets, and an implementation framework, including ongoing monitoring and review, to ensure that travel-behaviour outcomes are actively managed over time. The GTP also includes commitments relating to bicycle parking provision, end-of-trip facilities, travel information, wayfinding and behavioural change initiatives.

In the context of the site's transit-oriented location and the application of Housing SEPP parking rates, the Green Travel Plan provides an additional layer of assurance that the proposed car parking provision is appropriate and that traffic and parking impacts can be appropriately managed over time.

4.7 Other Approvals

Section 4.46 of the EP&A Act requires consideration of whether the development would trigger approvals under other legislation (integrated development). A summary of any such approvals is provided in Table 15.

Table 15: Other Approvals

Relevant Statute	Approval / Trigger	Applicability
Roads Act 1993	Works in, on or over a classified road; connection works; pumping/discharge to road	Applicable – previously approved by TfNSW

Ecologically Sustainable Development (ESD) principles under the *Protection of the Environment Administration Act 1991* are considered as part of the assessment.

4.8 Pre-conditions

There are no preconditions required to grant approval for the project.

4.9 Mandatory Considerations

Statutory Compliance Table in Appendix B outlines all statutory consideration and how they have been addressed.

Table 16 outlines the relevant mandatory considerations that must be considered in determining this SSDA under the EP&A Act and the sections where these matters are addressed within the EIS.

Table 17 outlines the relevant mandatory considerations under other legislation and EPIs.

Table 16: Mandatory matters for consideration under the EP&A Act and Regulations

Statutory Reference	Mandatory Consideration
EP&A Act	
Section 1.3	Complies. See Appendix B – Statutory Compliance Table
Section 4.15(1)(a)	Complies See Appendix B – Statutory Compliance Table
Regulations	
Part 3 Development Application, Section 35B	Complies See Appendix B – Statutory Compliance Table
Part 8, Infrastructure and Environmental Impact Section 190, 191, 192, 193	Complies See Appendix A – SEARs Compliance Table, and Appendix B – Statutory Compliance

Table 17: Mandatory matters for consideration under other legislations and EPIs

Statutory Reference	Mandatory Consideration
State Environmental Planning Policy (Planning Systems) 2021 Section 2.6	Complies Appendix B – Statutory Compliance, EIS Chapter 4.2 above
State Environmental Planning Policy (Transport and Infrastructure) 2021 Section 2.120, 2.122	Complies Appendix B – Statutory Compliance
State Environmental Planning Policy (Housing) 2021 Section 15C, 16, 18, 147	Complies Appendix B – Statutory Compliance, EIS Chapter 4.2 above
State Environmental Planning Policy (Sustainable Buildings) 2022 Section 2.1	Complies Appendix B – Statutory Compliance
State Environmental Planning Policy (Resilience and Hazards) 2021 Section 4.6	Complies Appendix B – Statutory Compliance
Ku-ring-gai Local Environmental Plan 2015 Section 2.1, 4.3. 4.4, 4.5, 4.6, 5.10, 6.1, 6.2, 6.6, 6.7, 6.14	Complies Appendix B – Statutory Compliance, EIS Chapter 4.3 & 4.4 above,

5 Engagement

5.1 Engagement Carried Out

5.1.1 Overview

An engagement program was undertaken to ensure stakeholders are informed of the proposal, understand potential impacts, and have channels to provide feedback. Methods include letterbox flyer, drop-in session, webinar, survey, hotline/email, briefings and agency liaison.

The engagement process sought to capture an accurate understanding of key local issues within the community, identify potential ways to respond to areas of impact, and deliver clear communication between stakeholders and the project team. The Engagement Strategy adhered to the Department of Planning, Housing and Infrastructure's Undertaking Engagement Guidelines for State Significant Projects (November 2021) by:

- Engaging with relevant NSW Government agencies, Council, close neighbours, and targeted members of the community
- Informing the surrounding community to the site about opportunities to consult with the project team
- Explaining how community feedback will be considered and documented
- Providing relevant information in plain English so that potential impacts and implications can be readily understood
- Providing channels of communication to gather feedback directly to the project team

A Consultation Outcomes Report is provided in Appendix C**.** The engagement program was carried out with stakeholders considered most likely interested in or directly impacted by the proposal. The purpose of the engagement process for this submission was to ensure that these stakeholders were informed of the proposed development and had an opportunity to provide feedback and ask questions prior to lodgement. This included:

- Ku-ring-gai Council
- Department of Planning, Housing and Infrastructure (DPHI)
- Transport for NSW (TfNSW)
- Sydney Water
- AusGrid
- Fire And Rescue NSW
- Federal and State Members of Parliament
- Community stakeholders, including surrounding property owners, residents and businesses near to the site

The following engagement activities were undertaken to inform and consult with the stakeholders on the proposal:

- Letterbox drop of community notification flyer – to surrounding households and businesses, which included information about the proposal and details on how to provide feedback
- Community information drop-in session – including 7 information display boards, attended by members of the project team
- Community information webinar – including a formal presentation from the key members of the project team and an opportunity for attendees to ask questions via a Q&A
- Social impact feedback survey – a short anonymous survey was included on the community notification flyer to help inform the Social Impact Assessment
- Dedicated project enquiry hotline and email – available during business hours to respond to questions and receive project feedback

5.1.2 Community Views

Table 18 outlines the Key Stakeholder views and the project response:

Table 18: Key Stakeholder views

Stakeholder	Matter discussed/raised	Project response
Consolidated Community Feedback	**Traffic congestion and parking** Concerns regarding traffic congestion at the intersection of Dumaresq Street and Pacific Highway and limited parking on Dumaresq Street	Details on how traffic impacts will be mitigated can be reviewed in detail within the Traffic Impact Assessment (Appendix R)
Consolidated Community Feedback	**Construction management** Queries around the hours of construction, and concerns about noise produced from construction activities	A preliminary construction management plan (CMP) will be prepared in the next phase of the project, if approved. It will detail proposed mitigation measures to limit disruption to neighbours.
Consolidated Community Feedback	**Project timeline** Feedback to accelerate the project to bring forth the delivery of the new Aldi supermarket	The current intention is to commence construction as soon as the necessary approvals are granted.
Ku-ring-gai Council	**Design Advice** The proponent has sought Council's approval and design advice for the new pathway between the Pacific Highway and Radford Place. A pre-lodgement meeting that was scheduled was cancelled.	Response to Council is provided throughout this EIS and relevant Appendices: Architectural Design Report (Appendix I), Traffic Impact Assessment (Appendix R). The applicant has been engaging extensively with Council through the modification of DA0610/17 including the interface pathway between the Council chambers and the subject site. The proponent commits to working with Council during the lodgement and assessment phases of the project to ensure that integration considerations, CPTED, and the like are incorporated into any responses to submissions.
TfNSW	**Road Upgrades** Reiteration of previous compliance with land requirement and upgrades to Pacific Highway – DA0610-17 (as modified)	A detailed Traffic Impact Assessment (Appendix R) and Chapter 6.26 Transport, Traffic, Parking and Access responds to comments raised
Sydney Water	NA	Servicing requirements are outlined in Infrastructure Report (Appendix N) and Chapter 6.25 Infrastructure and Utilities outlines a Section 73 application is to be lodged.

5.2 Engagement to be Carried Out

The next steps in the SSD process include:

- exhibition of this EIS for a minimum of 14 days and invitation for the community and stakeholders to make submissions;
- consideration of submissions received by the DPHI will be provided to the applicant who may then be required to prepare and submit a Submissions Report, responding to issues raised in the submissions; and an Amendment port (if applicable), outlining any proposed changes to the proposal to minimise its environmental impacts or to deal with any other issues raised;
- determination by the Minister for Planning and Public Spaces including, if approved, conditions of approval.

Consultation with the community and stakeholders will continue throughout the detailed design and construction phases.

6 Assessment of Impacts

In accordance with section 192 of the *Environmental Planning and Assessment Regulation 2021*, the Planning Secretary issued the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of this Environmental Impact Statement (EIS) on 9 December 2025.

This chapter provides a comprehensive assessment of the environmental, social and economic impacts of the proposed State Significant Development and responds directly to the matters for consideration set out in the SEARs. The assessment has been prepared having regard to the nature and scale of the development, the characteristics of the site and its surrounds, and the applicable statutory and policy framework.

A consolidated SEARs compliance table, identifying where each requirement has been addressed within the EIS, is provided at Appendix A.

Assessment Framework and Methodology

The assessment contained within this chapter is informed by:

- specialist technical studies prepared in accordance with the SEARs and relevant statutory guidance;
- the principles of ecologically sustainable development;
- the matters for consideration under section 4.15 of the Environmental Planning and Assessment Act 1979, as relevant to State Significant Development; and
- the DPHI Cumulative Impact Assessment Guidelines for State Significant Projects.

Cumulative impacts have been considered in the context of existing, approved and reasonably foreseeable developments within the surrounding area, having regard to both construction and operational phases, as defined in Section 2.4 of this EIS.

Supporting Documentation and Appendices

Key supporting schedules and appendices relevant to the impact assessment include:

- Appendix A – SEARs compliance table identifying where each SEARs requirement has been addressed;
- Appendix B– Statutory compliance table identifying how relevant legislation, environmental planning instruments and guidelines have been considered;
- Appendix C – Community and stakeholder engagement table identifying how agency advice and issues raised during consultation have been addressed; and
- Appendix D– Schedule of mitigation measures, supplementary to the embedded design responses of the project.

Detailed specialist reports and technical studies prepared to support the assessment are referenced throughout this chapter and appended to the EIS where relevant.

Where referenced, each technical study has been summarised within the relevant assessment section to clearly identify key findings, potential impacts and mitigation measures, rather than relying solely on appendix material.

Summary of Key Impact Matters

The assessment in this chapter identifies that the key environmental issues associated with the proposed development include, but are not limited to:

- built form, urban design and town centre interface impacts;

- affordable housing delivery and public benefit outcomes;
- traffic, transport and access;
- noise, vibration and air quality during construction and operation;
- water management, flooding, groundwater and dewatering;
- waste management during construction and operation;
- heritage, contamination and remediation considerations;
- ecology, trees and landscaping; and
- construction management and cumulative impacts.

Each of these matters has been assessed in detail, with appropriate mitigation and management measures identified where required. Subject to the implementation of these measures and the design commitments documented in this EIS, the proposed development is considered acceptable when assessed against the SEARs, relevant statutory requirements and applicable State and local planning policy.

6.1 Biodiversity

6.1.1 Overview

This section assesses the potential biodiversity impacts of the proposed State Significant Development having regard to the *Biodiversity Conservation Act 2016* (BC Act**)**, the *Biodiversity Conservation Regulation 2017***,** and the Planning Secretary's Environmental Assessment Requirements (SEARs).

A Biodiversity Development Assessment Report (BDAR) Waiver Request was prepared by Ecological Solutions Pty Ltd and submitted with the Secretary's Environmental Assessment Requirements. The waiver request concludes that the proposal is not likely to have any significant impact on biodiversity values**,** and that preparation of a BDAR is therefore not required under section 7.9(2) of the BC Act. The full BDAR Waiver Request and subsequent BDAR waiver is included at Appendix T.

6.1.2 Site Biodiversity Context and Impact Assessment

The subject site comprises a highly modified brownfield site within an established town centre environment. The site has been previously developed and partially demolished in accordance with existing approvals and presently contains a derelict basement structure with limited remnant landscaping. The site is surrounded by dense urban development and major transport infrastructure.

A detailed ecological assessment undertaken by Ecological Solutions Pty Ltd confirms that the site contains no native vegetation communities of conservation significance, is not mapped on the NSW Biodiversity Values (BV) Map and does not support habitat for threatened flora or fauna species. Vegetation present on the site is limited to small areas of historic urban landscaping, the majority of which comprises exotic or ornamental species, with no Plant Community Types (PCTs) recorded.

The site does not function as habitat or a movement corridor for fauna, is not connected to nearby vegetated areas, and contains no watercourses, wetlands or aquatic habitat. Given the extent of prior disturbance and the surrounding urban context, the site has negligible biodiversity value, noting that residual tree management, landscaping outcomes and precautionary fauna safeguards remain relevant considerations addressed through this EIS.

6.1.3 Vegetation Removal and Habitat Considerations

The proposed development involves the removal of a small area of degraded landscaping associated with the former commercial development. Ecological surveys confirm that:

- approximately 72% of recorded plant species are exotic;

- the remaining species comprise isolated native ornamental plantings with no habitat function; and
- vegetation does not form part of any threatened ecological community or remnant native vegetation.

The removal of this landscaping will not result in the loss of ecological habitat or biodiversity values. Importantly, the proposed development includes a comprehensive landscape strategy that will deliver a net increase in vegetation cover, canopy planting and urban greening across the site upon completion.

6.1.4 Threatened Species and Prescribed Impacts

In accordance with the Biodiversity Conservation Regulation 2017, potential prescribed impacts were assessed, particularly in relation to the demolition of human-made structures that could theoretically provide roosting habitat for threatened microbat species.

A targeted microbat inspection of the semi-demolished structure was undertaken by a suitably qualified ecologist. The inspection included all accessible voids, crevices, ducts and structural features capable of supporting microbat roosting. No microbats, roosting evidence or diagnostic signs (such as guano or staining) were identified during the inspection. Guano observed on site was confirmed to be attributable to pigeons actively occupying the structure at the time of inspection.

As a precautionary measure, the assessment recommends a pre-demolition ecological inspection immediately prior to final demolition works to ensure no fauna are present. This precautionary measure has been secured through conditions of the existing consent and implemented in consultation with a suitably qualified ecologist prior to final demolition works.

6.1.5 Habitat Connectivity and Ecological Function

The site does not form part of any wildlife corridor, flight path or ecological linkage. The surrounding environment consists predominantly of buildings, paved surfaces and major roads, which already limit ecological connectivity. The proposal will not fragment habitat, disrupt faunal movement, or affect broader ecological networks.

The assessment confirms that the proposed development will have no adverse impacts on habitat connectivity, regional biodiversity values or ecological processes.

6.1.6 Biodiversity Values Map and Clearing Thresholds

A Biodiversity Values Map and Threshold (BMAT) assessment confirms that:

- the site is not mapped under the Biodiversity Values Map;
- the proposal does not exceed the native vegetation clearing threshold; and
- no biodiversity offsets are triggered.

Accordingly, the proposal does not require the preparation of a Biodiversity Development Assessment Report.

6.1.7 Conclusion and BDAR Waiver Justification

Based on the findings of the ecological assessment, including:

- the absence of mapped biodiversity values;
- the highly disturbed and urbanised condition of the site;
- the lack of native vegetation, threatened species habitat or ecological connectivity; and
- targeted assessment confirming no prescribed biodiversity impacts,

the proposed development is not likely to have a significant impact on biodiversity values.

In accordance with section 7.9(2) of the *Biodiversity Conservation Act 2016*, the requirement for a Biodiversity Development Assessment Report has therefore been appropriately waived. Notwithstanding the BDAR waiver, tree management, landscaping delivery and unexpected fauna protocols will continue to be implemented in accordance with Appendices AA and O to ensure no residual biodiversity impacts occur.

6.2 Built Form

6.2.1 Overview

The proposed development has been designed to deliver a high-quality, contemporary built form outcome that responds to the site's strategic town centre location, surrounding context and approved development history. The design has been prepared by PBD Architects and is documented in the Architectural Design Report at Appendix I and Architectural Drawings at Appendix H.

The built form achieves an appropriate balance between increased density within a highly accessible centre and sensitivity to surrounding development, public domain interfaces and heritage context. It reflects the objectives of the Housing SEPP, KLEP 2015, ADG and relevant State design policies. This assessment considers the proposed built form, including the minor variations to height and floor space ratio sought pursuant to Clause 4.6 of the KLEP 2015. The Clause 4.6 variation requests are documented at Appendix U (height) and Appendix V (floor space ratio) and are summarised within this assessment.

6.2.2 Built Form Composition and Massing

The development adopts a podium-and-tower typology, consistent with emerging built-form patterns expected to be developed within the Gordon Local Centre and along the Pacific Highway corridor.

Key characteristics include:

- a strongly defined podium that addresses Pacific Highway, Dumaresq Street and the new public pedestrian laneway;
- upper-level residential towers that are articulated, recessed and separated to reduce bulk and improve visual permeability; and
- a built form envelope that aligns with both the underlying LEP controls and the additional height and floor space enabled under the Housing SEPP infill affordable housing provisions.

The podium scale provides a contextual transition between the street environment and the taller tower elements above, reinforcing pedestrian amenity and human scale at ground level.

6.2.3 Height, Scale and Urban Context

The overall height and scale of the development has been carefully calibrated having regard to:

- the approved development envelope under DA0610/17;
- adjacent and nearby high-density residential development controls including additional height proposed on the adjoining Council owned site;
- the site's prominent location fronting the Pacific Highway; and
- the role of Gordon as a key centre within Ku-ring-gai.

Height is modulated through:

- stepped setbacks above the podium;
- varied tower footprints; and
- articulation of façades to break down perceived scale.

When viewed from the public domain, the building reads as a series of layered forms, rather than a single monolithic mass, ensuring that the proposal does not appear visually dominant or overbearing.

6.2.4 Street Interface and Public Domain Response

At ground level, the built form prioritises activation, permeability and pedestrian comfort.

Key design responses include:

- a full-line ALDI supermarket addressing the street and reinforcing Gordon's retail function;
- active frontages along Pacific Highway and Dumaresq Street, consistent with Clause 6.7 of the KLEP 2015;
- a new public east–west pedestrian connection linking Pacific Highway to Radford Place, enhancing permeability and legibility; and
- awnings, canopies and landscape elements that provide weather protection and improve the pedestrian experience.

The podium design incorporates strong vertical and horizontal articulation to reinforce the rhythm of surrounding development and contribute positively to the public realm.

6.2.5 Façade Articulation and Architectural Expression

The architectural language draws on contemporary materials, depth and shadow to achieve visual interest and longevity.

Façade treatment includes:

- modulation of balconies and façade planes to reduce visual bulk;
- variation in materiality and colour to distinguish podium and tower elements;
- generous glazing to maximise daylight and outlook; and
- recessed elements and vertical breaks that reduce repetition and enhance articulation.

The design avoids large uninterrupted façades, instead adopting a fine-grain expression that aligns with State Design Quality Principles and local character expectations.

6.2.6 Residential Amenity and ADG Compliance

The built form has been designed to support high levels of residential amenity, consistent with the Apartment Design Guide.

Key outcomes include:

- appropriate building separation distances to protect privacy;
- amenity and access outcomes that meet or exceed ADG benchmarks for habitable rooms and communal open space;
- effective acoustic separation from the Pacific Highway through podium placement, building orientation and façade design; and
- a diverse mix of dwelling sizes and layouts, including well-distributed affordable housing.

Communal open space is integrated at the podium and rooftop levels, providing residents with accessible, usable outdoor areas that are protected from wind and noise impacts.

6.2.7 Relationship to Approved Development

The proposed built form represents an evolution of the approved DA scheme, informed by updated planning controls, Housing SEPP incentives and contemporary design expectations.

While the proposal increases overall residential yield and introduces a significant affordable housing component, the built form:

- maintains key massing principles established under the approved development;
- improves articulation, separation and public domain outcomes; and
- delivers a more efficient and coherent urban design response.

6.2.8 Built Form Impact Summary

Overall, the built form:

- is appropriate for a strategic centre location with high public transport accessibility;
- responds positively to its urban context and surrounding development;
- delivers strong public domain and street-level activation;
- provides high-quality residential amenity; and
- is consistent with State and local planning and design objectives.

The proposal is therefore considered acceptable from a built form perspective and capable of delivering a high-quality, well-integrated mixed-use development outcome.

6.3 Accessibility

6.3.1 Overview

Accessibility has been a fundamental consideration in the design of the proposed mixed-use development. The proposal has been designed to provide safe, equitable and dignified access for all users, including residents, visitors, customers, staff, people with disability, older persons, families with children and those with temporary mobility impairments.

The assessment of accessibility has been undertaken having regard to the:

- SEARs;
- Design Quality Principles of the *Apartment Design Guide* (ADG);
- Disability Discrimination Act 1992 (DDA);
- *National Construction Code* (NCC), including *AS 1428* and related Australian Standards; and
- contemporary universal design principles.

Detailed accessibility design measures are documented in the Architectural Design Report prepared by PBD Architects (Appendix I) and the BCA Regulatory Compliance Assessment (Appendix J).

6.3.2 Site Access and Movement

The site is located within a highly accessible town centre environment and benefits from:

- level or gently graded pedestrian access from Pacific Highway, Dumaresq Street and Radford Place;
- proximity to Gordon Railway Station (approximately 300 metres walking distance); and
- continuous footpath connections to surrounding shops, services and civic facilities.

A publicly accessible east–west pedestrian laneway is incorporated through the site, improving permeability, safety and convenience for pedestrians. The laneway is designed with:

- compliant gradients;
- generous clear widths;

- slip-resistant surfaces;
- crime prevention through environmental design (CPTED) principles; and
- integrated lighting and wayfinding.

6.3.3 Building Entrances and Internal Circulation

All primary building entries have been designed to be accessible and legible, incorporating:

- step-free access from the public domain;
- automatic or low-resistance entry doors where required;
- weather protection through awnings and recessed entries; and
- clear visual cues and signage.

Internal circulation spaces, including lobbies, corridors, lifts and common areas, are designed to:

- comply with NCC and AS 1428 requirements;
- provide sufficient circulation widths for wheelchairs and mobility aids;
- include accessible lift access to all residential levels, basement parking and communal spaces; and
- ensure convenient, safe movement between uses within the mixed-use building.

6.3.4 Accessible Dwellings

The residential component includes a proportion of apartments designed to meet accessible and adaptable housing standards, consistent with the ADG and Housing SEPP objectives.

Accessible dwellings are:

- distributed across the building to avoid concentration;
- located on levels served by lifts;
- designed to allow future adaptability without major structural alteration; and
- capable of accommodating a range of mobility needs.

All dwellings incorporate universal design features such as:

- level entries from lift cores;
- accessible bathrooms with reinforced walls;
- adequate circulation zones within living areas; and
- appropriate door widths and controls.

6.3.5 Retail and Non-Residential Accessibility

The ground-floor supermarket and retail uses are designed to ensure:

- step-free access from the public footpath;
- compliant aisle widths and circulation paths;
- accessible sanitary facilities where required; and
- clear wayfinding between retail, residential and public areas.

Service and loading functions are designed to operate independently of public pedestrian routes, maintaining safety and accessibility for all users.

6.3.6 Parking, Drop-Off and End-of-Trip Facilities

Accessible car parking spaces are provided within the basement parking levels in accordance with:

- the NCC;
- AS 2890.6; and
- relevant Council requirements.

These spaces are:

- located close to lift cores;
- clearly marked and signed; and
- connected to accessible paths of travel to all building uses.

Bicycle parking and end-of-trip facilities are also designed to be accessible, supporting inclusive active transport options.

6.3.7 Compliance and Ongoing Certification

The BCA Regulatory Compliance Assessment (Appendix J) confirms that the development is capable of achieving full compliance with relevant accessibility provisions of the NCC, subject to detailed documentation at the Construction Certificate stage.

Further refinement of accessibility measures, including signage, tactile ground surface indicators and detailed fit-out elements, will be undertaken during detailed design to ensure full compliance with:

- the NCC;
- the DDA; and
- best-practice universal design principles.

These matters are capable of being resolved through the detailed design and certification process and do not present any accessibility constraints at the SSDA approval stage.

6.3.8 Accessibility Impact Summary

The proposed development:

- provides safe, equitable and step-free access to all parts of the site;
- integrates accessible movement through a highly connected town centre location;
- delivers accessible dwellings and common areas suitable for a diverse resident population;
- ensures inclusive access to retail, communal and public spaces; and
- can achieve full compliance with statutory accessibility requirements.

Accordingly, the proposal is considered acceptable from an accessibility perspective and consistent with SEARs requirements and State planning objectives for inclusive, well-designed urban development.

6.4 Wind Assessment

A Pedestrian Wind Environment Study has been prepared by Windtech Consultants and is included at Appendix S. The assessment evaluates the wind environment associated with the proposed mixed-use development with a focus on pedestrian comfort and safety within and around publicly accessible and communal outdoor areas

The assessment has been undertaken in response to the SEARs, and addresses the following requirements:

- SEARs Item 7.1 – assessment of amenity impacts on the surrounding locality, including wind impacts, with a high level of environmental amenity to be demonstrated;
- SEARs Item 23.1(d) – demonstration that public and communal spaces maximise amenity consistent with their intended use, including wind protection; and
- Additional Requirement Item 6(a) – assessment of wind impacts arising from building bulk, scale and form.

An Addendum Wind Environment Letter, also prepared by Windtech, reviews subsequent design refinements and confirms the continued applicability of the original wind tunnel testing and mitigation measures.

The recommended mitigation measures are incorporated into the architectural and landscape design and do not rely on future retrofit or post-approval management.

6.4.1 Assessment Methodology

The wind environment assessment was undertaken using boundary layer wind tunnel testing in accordance with best-practice standards, including the Australasian Wind Engineering Society (AWES) Quality Assurance Manual, AS/NZS 1170.2, and relevant international guidelines.

Key elements of the methodology included:

- construction of a 1:300 scale physical model of the development and surrounding context (within a 375 m radius);
- testing across 16 wind directions at 22.5-degree increments;
- incorporation of local terrain roughness and regional wind climate data derived from long-term records at Sydney Airport; and
- assessment of both pedestrian comfort (using Gust Equivalent Mean (GEM) wind speeds) and pedestrian safety (using annual maximum gust criteria).

The study tested the development without additional wind mitigation devices not shown on the architectural drawings, ensuring a conservative assessment approach.

6.4.2 Pedestrian Comfort and Safety Criteria

Wind conditions were assessed against established and widely adopted criteria, including:

- Lawson (2001) pedestrian comfort criteria, applied using GEM wind speeds with a 5% probability of exceedance; and
- Melbourne (1978) pedestrian safety criterion, applying a maximum annual 3-second gust limit of 23 m/s for all trafficable areas.

Different criteria were assigned depending on the intended use of each space, including walking areas, standing/seating zones and communal terraces.

6.4.3 Wind Environment Results

The study assessed 41 critical outdoor locations across the site, including:

- ground-level footpaths and building entries;
- the public laneway and retail forecourt;

- podium-level communal spaces; and
- upper-level communal and private terraces.

The results indicate that:

- the majority of outdoor areas achieve the relevant comfort and safety criteria without mitigation; and
- a limited number of locations, particularly at ground level corners and upper-level terraces, would experience elevated wind speeds under certain conditions.

Importantly, the assessment demonstrates that wind conditions with the proposed development are generally comparable to, or improved relative to, existing conditions, particularly where new building forms provide additional shelter at street level.

6.4.4 Wind Mitigation Measures

Where exceedances were identified, Windtech has recommended targeted and integrated mitigation measures, which are reflected in the architectural and landscape design, including:

- retention and enhancement of dense planter boxes with evergreen planting (up to 1.5 m high) at ground, podium and terrace levels;
- provision and extension of awnings along the Radford Place and Dumaresq Street frontages, improving pedestrian comfort and weather protection;
- inclusion of porous screening elements (approximately 30% porosity) at wind-exposed corners; and
- increased balustrade heights at selected upper-level terraces.

The Windtech Addendum Letter confirms that subsequent design changes - including refined landscaping, additional awnings and minor massing adjustments - do not materially alter the wind environment outcomes, and that the original findings and mitigation strategy remain valid.

These measures form part of the approved built form and landscape strategy and will be secured through conditions of consent, ensuring delivery of the wind mitigation outcomes identified in Appendix S.

6.4.5 Wind Assessment Summary

The Wind Environment Assessment demonstrates that the proposed development:

- Maintains acceptable pedestrian comfort and safety conditions across public, communal and private outdoor areas, subject to integrated mitigation measures;
- Does not result in unacceptable wind impacts on surrounding streets, footpaths or neighbouring sites;
- Enhances amenity in key pedestrian areas, particularly through new awnings, building articulation and landscape integration; and
- Is consistent with SEARs Items 7 and 23, and State planning objectives for well-designed, high-amenity development within strategic centre locations.

Accordingly, the proposal is considered acceptable from a wind environment perspective, and capable of delivering safe, comfortable and well-protected outdoor spaces consistent with their intended use.

6.5 Visual Impact

6.5.1 Assessment Context and Methodology

This section assesses the visual impacts of the proposed development having regard to its scale, form, siting and architectural expression, and the sensitivity of surrounding public and private viewpoints. The assessment has been informed by the Architectural Design Report and Visual Impact Analysis prepared by PBD Architects, including verified and illustrative views, streetscape perspectives, massing diagrams and material studies (Appendix I).

The assessment focuses on:

- visibility of the development from key public domain locations;
- the degree of contrast or compatibility with existing and emerging character;
- impacts on sensitive receivers, including adjacent heritage items; and
- the effectiveness of built form and design measures in mitigating visual impacts.

6.5.2 Existing Visual Environment

The site is located within the Gordon Town Centre, characterised by a heterogeneous urban environment comprising:

- contemporary mixed-use buildings generally ranging from 2–5 storeys;
- larger civic buildings, including the adjacent Ku-ring-gai Council Chambers (a heritage item);
- the Gordon Centre retail complex; and
- established residential flat buildings in surrounding streets.

The visual environment is already influenced by large-scale built form, major transport infrastructure (the Pacific Highway and rail corridor), and a planned transition to higher-density development under the amended KLEP 2015 and the station precinct planning framework.

6.5.3 Key Viewpoints and Visual Sensitivity

Key publicly accessible viewpoints include:

- Pacific Highway approaches to the site;
- the Pacific Highway / Dumaresq Street intersection;
- Dumaresq Street and Radford Place streetscapes; and
- views from the Gordon Centre and near-field public realm.

These viewpoints are considered to have moderate to high visual sensitivity, given their role as primary pedestrian and vehicular routes. More distant views from surrounding residential areas are of lower sensitivity, noting the evolving town centre context and planned increase in building heights.

6.5.4 Visual Impact of the Proposal

6.5.4.1 Built Form and Massing

The proposed tower is visually prominent due to its height; however, its slender proportions, articulated massing and stepped form materially reduce perceived bulk when viewed from the public domain. The tower mass is deliberately recessed and redistributed to maintain view corridors, reduce dominance at street level, and improve transitions to adjacent buildings.

The podium establishes a strong and legible street wall, providing visual continuity along Pacific Highway and Dumaresq Street, while clearly differentiating the tower element above.

6.5.4.2 Streetscape and Public Domain

At street level, visual impacts are moderated through:

- active retail frontages and a prominent corner entry;
- a double-height podium articulation that enhances human scale;
- setbacks and site-through links that increase visual permeability; and
- integrated landscaping that softens built edges.

These measures ensure that the most visually sensitive zone—the pedestrian realm - experiences a high-quality, activated and human-scaled outcome, despite the overall scale of the development.

6.5.4.3 Materiality and Architectural Expression

The visual character of the development is refined through a controlled material palette, including light-toned brickwork at podium level and darker, recessive cladding to the tower. Vertical articulation, varied setbacks and façade modulation break down the apparent height and reinforce slenderness, reducing long-range visual dominance.

6.5.4.4 Heritage Interface

The proposal maintains setbacks from the adjoining heritage-listed Council Chambers and is designed to ensure the heritage item retains its visual prominence within the streetscape. The contrast between contemporary and heritage forms is deliberate and respectful, allowing the heritage building to remain legible and visually distinct.

6.5.5 Emerging Planning Context and Visual Setting

While the proposed development will be the first building delivered under the amended Ku-ring-gai Local Environmental Plan 2015 controls for the Transport-Oriented Development (TOD) Railway Stations Precincts, it is important to recognise that the planning framework explicitly envisages significantly taller built form within the immediate locality.

Under the KLEP 2015, surrounding sites can accommodate substantially greater building heights, including:

- up to approximately 109 metres on the Gordon Centre site; and
- up to approximately 83.5 metres on the Council Chambers site immediately to the north.

Both sites are also eligible for an additional 30% height uplift under the Housing SEPP affordable housing bonus provisions, potentially resulting in even taller development outcomes within the same visual catchment. Notwithstanding this, neither site is subject to the Council affordable housing contribution requirements under clause 6.14 of the KLEP 2015, including the Council-owned land.

In this context, the proposed development does not represent an anomalous or visually disproportionate outcome. Rather, it reflects an early realisation of the planned future built form envelope for the Gordon Station precinct, consistent with the strategic intent of concentrating height, density and housing supply in highly accessible, transit-oriented locations.

6.5.6 Mitigation Measures

Visual impacts are mitigated through:

- a built-form-led design response prioritising slenderness and articulation;
- podium and tower differentiation to reduce perceived scale;
- recessive upper-level materials;
- strategic setbacks from sensitive interfaces, including heritage items; and
- integrated landscape elements within the public domain.

These measures are embedded within the approved design and do not rely on post-approval management.

6.5.7 Assessment Outcome

While the proposal will introduce a taller built form into the Gordon Town Centre, the resulting visual impacts are considered acceptable in the context of:

- the site's strategic centre location;
- the planned future character envisaged under the amended planning framework; and
- the high-quality architectural response and mitigation measures incorporated into the design.

The development contributes positively to the evolving skyline and streetscape of Gordon, delivering a visually coherent and contextually responsive outcome. Accordingly, the proposal is considered acceptable from a visual impact perspective.

6.6 Compliance with the Building Code of Australia

A BCA Regulatory Compliance Assessment Report, prepared by McKenzie Group Consulting and included at Appendix J, has been undertaken for the proposed mixed-use development.

The assessment has been prepared to support the State Significant Development Application and addresses the SEARs, particularly those relating to:

- the safety, amenity and functionality of the built form;
- consistency with applicable statutory controls and technical standards; and
- demonstration that the proposal can achieve compliance with the National Construction Code (NCC).

The report has been prepared in accordance with NCC 2022 (Amendment 2), noting that the applicable NCC edition will ultimately be determined at the time of the Construction Certificate (CC) application, in accordance with the *Environmental Planning and Assessment Act 1979*.

6.6.1 Building Classification and Construction Parameters

The proposed development has been assessed as comprising the following BCA classifications:

- Class 2 – Residential apartments;
- Class 6 – Retail premises (supermarket);
- Class 7a – Car parking areas;
- Class 7b – Storage areas; and
- Class 9b – Gymnasium.

The building has an effective height of greater than 50 metres and a rise in storeys of 28, requiring Type A construction under the NCC. The building has also been identified as an Importance Level 3 structure for structural design purposes.

6.6.2 Compliance Approach and Methodology

The NCC is a performance-based code, allowing compliance to be achieved through:

- Deemed-to-Satisfy (DTS) solutions;
- Performance Solutions; or
- A combination of both.

The McKenzie Group assessment has reviewed the SSDA issue architectural documentation prepared by PDB Architecture against the relevant DTS provisions of NCC Volume One, with the objective of confirming that the proposal can achieve full compliance prior to the issue of Construction Certificates.

Where departures from DTS provisions have been identified, the report outlines pathways to compliance through either minor design refinement or the preparation of Performance Solutions addressing the relevant NCC Performance Requirements.

6.6.3 Fire Safety, Access and Amenity Considerations

The BCA assessment confirms that the proposal incorporates the core life safety and amenity systems required for a high-rise mixed-use building, including:

- full automatic sprinkler protection throughout the building;
- fire compartmentation and separation consistent with Type A construction;
- fire isolated stairs, emergency lifts and compliant egress systems;
- smoke hazard management systems, including pressurisation of fire-isolated exits; and
- comprehensive fire detection, alarm, EWIS, hydrant and hose reel systems.

The report identifies a few design matters requiring further resolution at detailed design stage, including travel distances, fire stair separation, and certain fire service layouts. These matters are not uncommon at the SSDA stage and are explicitly identified as being capable of resolution through:

- refinement of architectural layouts; and/or
- preparation of appropriately justified Performance Solutions, subject to consultation with Fire and Rescue NSW (FRNSW) at the CC stage.

6.6.4 Construction Certificate and Ongoing Compliance

The BCA Compliance Report confirms that:

- the proposal is suitable for approval at the development consent stage;
- detailed design documentation and regulated design declarations will be required prior to the issue of Construction Certificates, in accordance with the *Design and Building Practitioners Act 2020*; and
- all fire engineering, access, services and structural matters will be finalised through the CC process to demonstrate full NCC compliance.

This staged approach is consistent with established practice for State Significant Development and does not prejudice the ability of the development to meet statutory requirements.

6.6.5 Building Code of Australia Summary

The BCA Regulatory Compliance Assessment demonstrates that the proposed development:

- Can achieve full compliance with the NCC, based on its classification, construction type and scale;
- Incorporates appropriate fire safety, access, services and amenity systems for a high-rise mixed-use building;
- Identifies and transparently documents any departures from DTS provisions, with clear and acceptable pathways to compliance through design refinement or Performance Solutions; and
- Can be certified through the standard Construction Certificate process, without reliance on unresolved or untested assumptions.

Accordingly, the proposal is considered acceptable from a BCA and building regulatory perspective, and consistent with the SEARs requirement to demonstrate that the development can be safely, lawfully and practicably delivered.

6.7 Fire Safety and Engineering

6.7.1 Overview

This section addresses fire safety considerations associated with the proposed development, including the suitability of the fire safety strategy at a planning approval stage.

The assessment responds to the SEARs relating to fire safety, life safety and emergency management, and is informed by the Fire Engineering Report / SSDA Letter prepared by Engineering Lab NSW Pty Ltd (E-LAB Consulting) dated 6 January 2026, provided at Appendix KK.

6.7.2 Legislative and Regulatory Framework

Fire safety for the proposed development has been assessed regarding:

- Building Code of Australia (BCA) / NCC 2022;
- Relevant Australian Standards referenced by the NCC;
- NSW fire safety and certification requirements; and
- The role of fire engineering performance solutions where deemed-to-satisfy (DtS) provisions are not fully met.

Fire safety design is recognised as a matter primarily resolved at the detailed design and construction certificate stage; however, the EIS addresses whether the proposal can achieve compliance.

6.7.3 Fire Safety Strategy and Design Approach

A preliminary review of the architectural design and BCA compliance documentation was undertaken by E-LAB Consulting. The review confirms that:

- the proposed mixed-use development (residential apartments over retail and supermarket uses with basement car parking) can comply with the Performance Requirements of the NCC;
- most fire safety provisions can be addressed through Deemed-to-Satisfy (DtS) measures; and
- some aspects of the design will require performance-based fire engineering analysis to demonstrate compliance with the NCC Performance Requirements.

The need for performance solutions is not uncommon for large, complex mixed-use developments and does not indicate a fundamental fire safety constraint.

6.7.4 Planning-Stage Assessment and Impacts

From a planning and environmental assessment perspective:

- the proposed building form, height and use mix do not introduce unacceptable fire safety risks;
- the design allows for compliant fire compartmentation, fire separation and safe egress arrangements;
- suitable provision can be made for fire brigade access and fire-fighting services; and
- no off-site fire safety impacts are anticipated.

The fire engineering review confirms that no significant redesign of the proposal is required to achieve fire safety compliance, and that fire safety considerations do not constrain the acceptability of the development at the SSDA stage.

6.7.5 Detailed Design and Future Approvals

Detailed fire safety design will be progressed at the subsequent Construction Certificate stage and will include:

- preparation of a Fire Engineering Report (FER) where required;
- development of performance solutions in consultation with the Principal Certifier and relevant authorities; and
- certification of all fire safety systems in accordance with NSW legislation.

6.7.6 Conclusion

The Fire Engineering Report concludes that the proposed development:

- can comply with the Performance Requirements of the Building Code of Australia;
- does not present any unacceptable fire safety risks at a planning approval level; and
- can achieve full compliance through a combination of deemed-to-satisfy measures and targeted performance-based fire engineering at detailed design stage.

Accordingly, the proposal is considered acceptable from a fire safety and fire engineering perspective and consistent with SEARs and State planning expectations.

6.8 Noise and Vibration

6.8.1 Overview

This section addresses the potential **construction and operational noise and vibration impacts** associated with the proposed development and outlines the mitigation and management measures to be implemented to ensure compliance with relevant NSW Government policy and guidance.

A detailed Noise and Vibration Impact Assessment (Appendix JJ) has been prepared by Renzo Tonin & Associates (23 December 2025) in accordance with the SEARs and relevant NSW Environment Protection Authority (EPA) guideline.

6.8.2 Assessment Methodology and Policy Framework

The assessment has been undertaken having regard to the following key policies, guidelines and standards:

- NSW EPA Noise Policy for Industry (NPfI) (2016)
- NSW EPA Interim Construction Noise Guideline (ICNG) (2009)
- State Environmental Planning Policy (Transport & Infrastructure) 2021
- Development Near Rail Corridors and Busy Roads – Interim Guideline (2008)
- Australian Standard AS 2107:2016 – Recommended design sound levels and reverberation times for building interiors
- National Construction Code (NCC) 2022

The assessment included:

- Long-term ambient and background noise monitoring at representative on-site locations;
- Identification of nearby noise-sensitive receivers;
- Modelling of road and rail noise intrusion to the proposed development;
- Assessment of operational noise emissions from plant and communal areas; and

- Assessment of construction noise and vibration impacts, including excavation and basement works.

The assessment has been undertaken having regard to the proposed excavation depth and geotechnical conditions outlined in Appendix Y.

6.8.3 Existing Acoustic Environment

The site is located within an established urban town centre environment and is influenced primarily by:

- Road traffic noise from the Pacific Highway immediately east of the site; and
- Rail noise from the Sydney Trains corridor approximately 100 metres east.

Long-term monitoring indicates that background and ambient noise levels are typical of an urban arterial road environment. These measured levels have been used to derive site-specific noise criteria for both construction and operational phases in accordance with the NPfI and ICNG.

6.8.4 Construction Noise and Vibration Impacts

6.8.4.1 Construction Noise

Construction noise has been assessed quantitatively in accordance with the ICNG, given the scale and duration of the proposed works.

Noise management levels have been established for nearby residential and non-residential receivers. Modelling indicates that some construction activities may temporarily exceed the “noise affected” levels at nearby receivers during standard construction hours, particularly during demolition and bulk excavation phases.

These impacts are temporary, localised and manageable, and are consistent with construction activity in a dense town centre location.

6.8.4.2 Construction Vibration

Potential vibration impacts associated with excavation, piling and heavy plant operation have been assessed with reference to human comfort criteria and building damage thresholds.

The assessment concludes that:

- Vibration impacts on surrounding buildings are **not expected to exceed structural damage criteria**; and
- With appropriate management, vibration impacts can be maintained within acceptable human comfort limits.

Vibration monitoring and management during excavation and basement construction will be coordinated with the geotechnical recommendations in Appendix Y and implemented in accordance with the Noise and Vibration Impact Assessment (Appendix JJ).

6.8.5 Operational Noise Impacts

6.8.5.1 Road and Rail Noise Intrusion

Traffic noise modelling demonstrates that, without mitigation, external road noise would exceed internal acoustic criteria for residential apartments.

Accordingly, the assessment identifies:

- Required façade and glazing performance standards;
- Apartments capable of complying with “windows open” criteria; and

- Apartments requiring alternative ventilation solutions to allow windows to remain closed while maintaining acceptable internal noise levels.

With the recommended building fabric, glazing, sealing and ventilation measures implemented, all habitable rooms will achieve internal noise levels consistent with State policy requirements.

6.8.5.2 Mechanical Plant and Services

Noise emissions from mechanical plant (including car park exhausts and air-conditioning systems) have been assessed against the NPfI project noise trigger levels.

Detailed plant selection will occur at the detailed design stage; however, in-principle controls have been identified to ensure:

- Compliance with intrusive and amenity noise criteria at residential and commercial receivers; and
- No adverse sleep disturbance impacts during night-time periods.

6.8.5.3 Communal Areas

Potential noise impacts from communal facilities (including the gym, library/study spaces and rooftop communal areas) have been assessed.

Appropriate acoustic separation, floor treatments, ceiling construction and façade design are recommended to ensure that noise from communal areas does not adversely affect residential amenity within the building.

6.8.6 Mitigation and Management Measures

Key mitigation measures include:

- Acoustic façade and glazing treatments consistent with modelled noise levels;
- Acoustic seals, detailing and construction controls to maintain performance;
- Selection and isolation of mechanical plant to comply with NPfI limits;
- Construction noise controls consistent with ICNG best practice;
- Vibration management measures during excavation and construction;
- Coordination of vibration controls with excavation and shoring methodology; and
- Community notification, monitoring and complaints management procedures during construction.

These measures will be secured through conditions of consent and implemented during detailed design, construction and operation.

6.8.7 Conclusion

The Noise and Vibration Impact Assessment demonstrates that:

- Construction noise and vibration impacts are temporary, manageable and acceptable in the context of an urban centre location; and
- Operational noise impacts can be effectively mitigated through appropriate building design, plant selection and acoustic treatment.

Subject to implementation of the recommended mitigation measures, the proposed development will comply with applicable NSW noise and vibration criteria and will not result in unacceptable impacts on surrounding receivers or future occupants.

6.9 Contamination, Remediation and Hazardous Material

6.9.1 Overview

This section assesses potential land contamination and asbestos-related impacts associated with the proposed development and confirms the suitability of the site for the proposed mixed-use residential development.

The assessment responds to the Secretary's Environmental Assessment Requirements (SEARs) and is informed by the following technical reports prepared by Coleman & Adams Environmental Pty Ltd:

- Site Inspection Report / Clearance Certificate (5 December 2025) - Appendix GG
- Stage 4 Remediation and Validation Report (5 December 2025) - Appendix HH

These investigations were undertaken in accordance with the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (as amended 2013) (NEPM), relevant NSW EPA guidelines, and State Environmental Planning Policy (Resilience and Hazards) 2021.

6.9.2 Site History and Contamination Context

Historical investigations identified that the site had been subject to a range of historic commercial and light industrial uses, including former service station and mechanical workshop activities, resulting in imported fill of variable quality across parts of the site.

Previous investigations identified two discrete Areas of Environmental Concern (AECs) associated with:

- PAH-impacted fill at depth in the north-eastern portion of the site; and
- Localised heavy metal, total recoverable hydrocarbon (TRH) and PAH impacts within imported fill in the central-eastern portion of the site.

These impacts were localised, associated with historic fill horizons, and were not indicative of widespread site contamination.

6.9.3 Remediation Works Undertaken

Remediation works were undertaken in accordance with a Remedial Action Plan (RAP) prepared for the site, and included:

- targeted excavation and off-site disposal of impacted fill material within identified AECs;
- classification and disposal of excavated material in accordance with the NSW EPA Waste Classification Guidelines (2014); and
- validation sampling of excavation bases and walls to confirm successful removal of contaminated material.

A total of 50 validation soil samples were collected and analysed by a NATA-accredited laboratory following completion of remediation works. The results confirmed that remaining onsite material complies with the relevant investigation and screening levels for the proposed land use.

6.9.4 Validation Results and Site Suitability

The Stage 4 Remediation and Validation Report concludes that:

- all previously identified AECs have been successfully remediated;
- residual contaminant concentrations are below the applicable HIL-B, HSL-B, EIL and ESL criteria relevant to residential development with minimal accessible soil;

- groundwater does not require active remediation for the proposed land use and does not present a risk to human health, noting that groundwater quality management during construction is addressed separately in Chapter 6.14; and
- no further remediation or ongoing environmental monitoring is required.

Accordingly, the site is considered **suitable for the proposed residential land use** under *State Environmental Planning Policy (Resilience and Hazards) 2021* and NEPM criteria and does not pose a risk to human health or the environment.

6.9.5 Asbestos Assessment and Clearance

As part of demolition and remediation works, Coleman & Adams Environmental undertook targeted asbestos inspections and sampling of surface and exposed materials, including vinyl flooring and compressed concrete sheeting.

Key findings include:

- representative samples were analysed by a NATA-accredited laboratory in accordance with AS 5370:2024;
- no asbestos-containing material (ACM) or trace asbestos was detected in any samples; and
- materials visually assessed by a Licensed Asbestos Assessor (LAA) were confirmed as non-asbestos.

The Site Inspection Report confirms that the investigated materials are free from asbestos-related impacts, and that no residual ACM remains on site.

6.9.6 Ongoing Management and Unexpected Finds

While the site has been validated as suitable for the proposed development, standard contingency measures will apply during construction, including:

- implementation of an Unexpected Finds Protocol;
- cessation of works and consultation with a suitably qualified environmental consultant if previously unidentified contamination is encountered; and
- appropriate classification, handling and disposal of any unexpected material in accordance with relevant guidelines.

6.9.7 Conclusion

The remediation, validation and asbestos investigations demonstrate that:

- all identified contamination has been successfully remediated and validated;
- the site is suitable for the proposed mixed-use residential development;
- no asbestos-related risks remain; and
- no ongoing remediation or monitoring is required.

Groundwater quality management during excavation and dewatering will be undertaken in accordance with the Groundwater Quality Screening and Dewatering Management Plan described in Chapter 6.14.

The proposal is therefore considered acceptable from a land contamination and asbestos perspective and is consistent with the objectives of *State Environmental Planning Policy (Resilience and Hazards) 2021*, the NEPM, and relevant NSW planning and environmental policy.

6.10 Contributions and Public Benefit

The proposed development delivers a range of clear and tangible public benefits, consistent with State and local planning objectives, the principles of ecologically sustainable development and the public interest considerations under section 1.3 of the *Environmental Planning and Assessment Act 1979*. In particular, the proposal will:

- **Provide a substantial and deliverable affordable housing outcome** within the Gordon town centre, making a meaningful contribution to NSW's affordable housing objectives under the National Housing Accord and supporting improved housing choice in a highly accessible, transit-oriented location close to public transport, services and employment.
- **Increase housing supply and diversity** through the delivery of high-quality, liveable apartments designed to meet the needs of a broad range of households, including families, young people, older persons and people with disability, supported by universal design and adaptable housing principles.
- **Facilitate the orderly and efficient redevelopment of a strategic centre site** that has been partly demolished under existing approvals, replacing an underutilised and constrained site with a productive mixed-use outcome that optimises the use of existing infrastructure, services and public transport investment.
- **Deliver a high-quality built-form outcome** informed by a design-led approach that responds to the site's physical constraints and surrounding context and is consistent with the emerging strategic vision and desired future character of the Gordon Town Centre.
- **Support employment generation and local economic activity** through the provision of retail and commercial floor space at podium level, reinforcing Gordon's role as a local centre, contributing to Council's employment objectives and sustaining day-to-day services for residents, workers and visitors.
- **Secure the early delivery and ongoing operation of a full-line supermarket (ALDI)** ahead of the redevelopment of the adjacent Gordon Centre, ensuring continuity of access to essential retail services, supporting the vitality of the town centre core and mitigating the risk of retail vacancy or service disruption during periods of transition.

6.11 Water Management and Integrated Water Cycle

6.11.1 Overview

This section assesses the water management impacts of the proposed mixed-use development, including stormwater quantity and quality, erosion and sedimentation control, and wastewater servicing.

The assessment responds to SEARs Item 11 – Water Management, which requires the EIS to detail drainage design, stormwater treatment and servicing infrastructure, and demonstrate compliance with relevant Council requirements.

This assessment is informed by the Integrated Water Management Plan (IWMP) prepared by Van der Meer Consulting and included at Appendix II.

6.11.2 Existing Conditions and Water Catchment Context

The site occupies approximately 2,180 m² following dedication along the Pacific Highway frontage and is located within the Blackbutt Creek catchment. The site is fully urbanised and surrounded by established road, drainage and sewer infrastructure, with stormwater currently draining via Council systems in Radford Place.

The existing site condition is highly impervious, contributing to peak runoff and pollutant loads typical of town centre locations.

6.11.3 Construction Phase Water Management

6.11.3.1 Erosion and Sediment Control

During construction, erosion and sedimentation risks will be managed through the implementation of a Soil and Water Management Plan (SWMP) consistent with *Managing Urban Stormwater – Soils and Construction* (Landcom, 2004).

Key measures include:

- perimeter sediment control fencing;
- stabilised site access and wheel-wash areas;
- sediment traps and inlet protection for existing pits;
- controlled stockpile management; and
- staged excavation and progressive stabilisation.

These measures will minimise sediment-laden runoff leaving the site during construction.

6.11.4 Operational Stormwater Quantity Management

Stormwater drainage has been designed in accordance with:

- Ku-ring-gai Development Control Plan (2024);
- Ku-ring-gai Technical Guideline for Water Management (2023); and
- Australian Rainfall and Runoff (2019).

The proposed system includes:

- a pit and pipe drainage network collecting runoff from roofs and paved areas;
- an on-site detention (OSD) tank sized to limit post-development discharge rates to pre-development conditions for storms up to and including the 1% AEP event;
- controlled discharge to the existing Council drainage system in Radford Place; and
- defined overland flow paths to safely convey major storm flows in exceedance events.

The OSD system has been sized using the Council's adopted detention calculation methodology and complies with Council performance requirements.

6.11.5 Stormwater Quality Management

6.11.5.1 Objectives and Targets

Stormwater quality controls have been designed to achieve Ku-ring-gai Council's pollutant reduction targets, including:

- 85% reduction in Total Suspended Solids (TSS);
- 65% reduction in Total Phosphorus (TP);
- 45% reduction in Total Nitrogen (TN); and
- 70% reduction in gross pollutants.

6.11.5.2 Proposed Treatment Measures

The proposed stormwater treatment train includes:

- a stormwater quality treatment chamber incorporating two Atlan filtration units; and
- a 15kL rainwater harvesting tank for irrigation reuse, reducing potable water demand and runoff volumes.

Modelling using MUSIC demonstrates that the proposed system achieves or exceeds Council's water quality targets, notwithstanding limited bypass areas where connection is impractical due to site constraints.

6.11.6 Wastewater and Servicing Infrastructure

The site is serviced by an existing Sydney Water sewer main within Radford Place. The proposal includes:

- amplification of the existing sewer connection; and
- construction of a new manhole and upgraded sewer line in accordance with Sydney Water requirements.

Wastewater servicing arrangements are documented separately within the project's infrastructure servicing reports and have been designed to accommodate the proposed development without adverse downstream impacts.

6.11.7 Maintenance and Ongoing Management

To ensure ongoing performance, the following maintenance regime will be implemented:

- six-monthly inspection of the on-site detention system;
- periodic inspection and maintenance of filtration systems in accordance with manufacturer specifications; and
- routine inspection of rainwater reuse infrastructure.

Responsibility for maintenance will be clearly defined within building management documentation.

6.11.8 Water Management Summary and Conclusion

The Integrated Water Management Plan demonstrates that the proposed development:

- appropriately manages stormwater quantity by maintaining pre-development discharge rates;
- achieves Council stormwater quality targets through a robust WSUD treatment train;
- integrates erosion, sediment and water quality controls during construction;
- provides compliant wastewater servicing; and
- minimises impacts on downstream drainage systems and receiving waters.

Accordingly, the proposal is considered acceptable from a water management perspective and consistent with the relevant SEARs, Council requirements and best-practice urban water management principles.

6.12 Flooding

6.12.1 Overview

This section addresses the potential flood risk associated with the proposed development. A detailed Flood Risk Assessment (FRA) **(**Appendix CC**)** has been prepared by van der Meer Consulting (September 2025**)** in accordance with the SEARs and relevant NSW floodplain management guidelines.

The assessment considers existing flood studies adopted by Ku-ring-gai Council, site topography, catchment characteristics and the potential impacts of climate change on flood behaviour.

6.12.2 Site and Catchment Context

The site is located within the Blackbutt Creek catchment, which has a total catchment area of approximately 4.9 km² and drains to the Lane Cove River. The subject site is positioned at the upper (upstream) extent of the catchment, with ground levels rising to approximately 126 m AHD along Pacific Highway and falling away to the west.

The site is bounded by Pacific Highway to the east, Dumaresq Street to the south, and Radford Place to the west, with surrounding development characterised by a mix of high-density residential and commercial uses.

6.12.3 Flood Risk Assessment and Adopted Studies

Flood risk has been assessed with reference to the Blackbutt Creek Catchment Flood Study (2014), which is the adopted flood study for the locality. Mapping from this study demonstrates that the site:

- Is not inundated during the 1% Annual Exceedance Probability (AEP) flood event; and
- Remains outside the Probable Maximum Flood (PMF) extent.

As a result, the site is not located within the flood planning area and is not identified as flood-prone land.

6.12.4 Climate Change Considerations

The Flood Risk Assessment considered potential climate change impacts by assessing increases in rainfall intensity of 10%, 20% and 30% applied to the adopted TUFLOW flood model.

The assessment confirms that, under all climate change scenarios tested, the site remains outside the projected flood extents, including the most conservative 30% rainfall increase scenario. Climate change is therefore not expected to introduce flood risk to the site over the life of the development.

6.12.5 Flood Planning Requirements and Compliance

Ku-ring-gai Council's flood planning controls and the NSW Flood Risk Management framework require flood-related development controls to be applied only where land is identified as flood-prone.

As the site:

- Is not located within the Flood Planning Area, and
- Is not subject to inundation up to and including the PMF,

the application of a Flood Planning Level (FPL) and flood-related development controls is not required for the proposed development.

Notwithstanding the absence of flood risk, the development incorporates a comprehensive stormwater management strategy, including site grading to direct flows away from building entrances and provision of controlled overland flow paths to safely manage local runoff events

6.12.6 Conclusion

The Flood Risk Assessment concludes that:

- The site is flood free, including during extreme flood events;
- There is no adverse flood risk to the proposed development or surrounding properties;
- Climate change does not introduce additional flood constraints; and
- A flood impact assessment or flood emergency response planning is not required.

The proposed development is therefore considered acceptable from a flood risk perspective and complies with applicable NSW and Ku-ring-gai Council flood planning requirements.

6.13 Historical Archaeology and Non-Aboriginal Heritage

6.13.1 Overview

This section assesses the historical archaeological potential and non-Aboriginal heritage implications of the proposed development.

The assessment responds to the SEARs requirement for consideration of historical archaeological resources and heritage constraints, and is informed by the Historical Archaeological Assessment (HAA) prepared by Eco Logical Australia (August 2025), included at Appendix M.

6.13.2 Site Context and Heritage Listings

The site is located within the commercial and civic core of Gordon and is not listed on:

- the State Heritage Register (SHR);
- the Ku-ring-gai LEP 2015 Schedule 5; or
- any Heritage Conservation Area (HCA).

Several heritage items occur within the broader locality, including:

- Gordon Public School (State and local significance), approximately 50 m north; and
- Ku-ring-gai Council Chambers (local significance), immediately adjacent to the north.

No heritage-listed items are located within the subject site, and the proposal does not involve works to any heritage-listed structure or place.

6.13.3 Historical Use and Archaeological Context

Historical research indicates the site has undergone extensive transformation since the early 19th century, including:

- early farming use associated with original colonial land grants;
- subdivision and development with residential dwellings and a motor garage during the late 19th and early 20th centuries; and
- substantial redevelopment in the 1980s, including construction of the former Allergan commercial building with deep basement excavation.

The HAA confirms that the construction of the 1980s building involved significant subsurface disturbance, including multiple basement levels and deep foundations, which have likely removed or truncated any remaining archaeological deposits across much of the site.

6.13.4 Archaeological Potential and Significance

Based on site inspection, historical mapping, aerial imagery and disturbance analysis:

- the majority of the site is assessed as having nil archaeological potential; and
- limited site margins external to the former building footprint have low archaeological potential but are heavily disturbed.

Any potential archaeological material associated with early farming, residential occupation or the former motor garage is likely to be:

- highly fragmented or truncated;
- representative of common and well-documented site types; and
- lacking sufficient integrity or rarity to meet the threshold for local or State significance.

Accordingly, the site does not contain archaeological “relics” as defined under the *NSW Heritage Act 1977* and does not warrant further archaeological investigation prior to development.

6.13.5 Impact Assessment

The proposed development includes excavation for basement levels across most of the site and would result in removal of any remaining shallow subsurface deposits.

Given:

- the extensive prior disturbance;
- the absence of intact or significant archaeological material; and
- the low to nil archaeological potential identified,

the proposal is not expected to result in any significant impact to historical archaeological resources.

6.13.6 Management Measures and Unexpected Finds Protocol

While no archaeological constraints are anticipated, a standard Unexpected Finds Protocol will be implemented during construction. Should any potential historical relics be discovered:

- works in the immediate area will cease;
- the find will be secured; and
- a qualified heritage specialist will assess the material and advise on any statutory requirements in consultation with Heritage NSW.

This protocol ensures compliance with Section 139 of the *Heritage Act 1977*, should unforeseen material be encountered.

6.13.7 Conclusion

The Historical Archaeological Assessment demonstrates that:

- the site has low to nil historical archaeological potential;
- no known heritage items or relics will be impacted by the proposal;
- extensive prior disturbance has removed the integrity of earlier deposits; and
- no further archaeological investigation or Heritage Act approval is required.

Accordingly, the proposal is considered acceptable from a historical archaeology and non-Aboriginal heritage perspective, and consistent with State and local heritage policy frameworks.

6.14 Geology, Groundwater and Dewatering

6.14.1 Overview

This section assesses the potential environmental impacts associated with geology, groundwater, dewatering and geotechnical conditions for the proposed mixed-use development.

The assessment responds to the SEARs and has been informed by the following technical studies:

- Geotechnical Investigation – JK Geotechnics (April 2024) - Appendix Y
- Groundwater Assessment – Douglas Partners (February 2025) - Appendix X
- Groundwater Quality Screening – JK Environments (April 2025) - Appendix Z
- Dewatering Management Plan (DMP) – JK Geotechnics (October 2025) - Appendix EE

Collectively, these investigations confirm that groundwater and geotechnical impacts associated with construction and operation can be appropriately managed and will not result in unacceptable off-site impacts.

This conclusion is subject to the implementation of groundwater treatment, monitoring and regulatory approval requirements outlined in this section.

6.14.2 Site Geology and Subsurface Conditions

The site is underlain by a thin layer of fill and residual soils overlying Ashfield Shale, transitioning to siltstone and sandstone bedrock at depth.

Detailed subsurface investigations undertaken by JK Geotechnics included:

- eleven boreholes drilled across the site (including previous investigations),
- five permanent groundwater monitoring wells,
- packer testing within bedrock, and
- over three months of groundwater monitoring.

Bedrock was encountered at relatively shallow depths, and the geological profile is typical of ridge-top locations within the Ku-ring-gai local government area. These conditions are considered suitable for the proposed deep basement excavation when designed and constructed in accordance with the geotechnical recommendations.

6.14.3 Groundwater Regime

Groundwater monitoring indicates standing water levels generally between RL 107.4 m and RL 107.9 m, which is above the proposed basement excavation level (approximately RL 102–105 m).

Hydrogeological assessment confirms that:

- groundwater is predominantly contained within low-permeability bedrock;
- the regional aquifer is classified as low to moderate productivity; and
- groundwater yields in the area are generally limited.

The site is not located near surface water bodies, with the nearest receiving environment being Amaroo Gully approximately 600 metres to the south-west, which ultimately drains to the Lane Cove River.

6.14.4 Groundwater Quality

A groundwater quality screening undertaken by JK Environments identified elevated concentrations of some metals (including copper, nickel, zinc and aluminium) and the presence of faecal coliforms and *E. coli*, likely associated with historic urban land uses and potential sewer leakage in the vicinity.

The screening results indicate that untreated groundwater is not suitable for uncontrolled discharge without treatment.

Importantly:

- no groundwater-dependent ecosystems were identified on or adjacent to the site;
- no potable or irrigation groundwater users were identified within 500 metres; and
- groundwater is not relied upon as a beneficial resource in the locality.

These findings inform treatment and disposal requirements but do not present a constraint to development when managed in accordance with the DMP.

6.14.5 Dewatering and Aquifer Interference Assessment

The proposed development includes excavation for up to six basement levels, requiring temporary construction dewatering. This constitutes an aquifer interference activity under the Water Management Act 2000.

The Dewatering Management Plan prepared by JK Geotechnics assessed predicted groundwater inflows and drawdown using numerical modelling and confirms that:

- anticipated groundwater extraction is approximately 71,000–108,000 litres per week;
- drawdown will be largely confined within bedrock beneath the site;
- induced settlement beyond the site boundary will be negligible; and
- no adverse impacts to adjacent structures, registered bores or ecological systems are expected.

While total extraction may exceed 3 ML per annum, triggering the potential requirement for a Water Access Licence (WAL), provisions exist for exemptions (subject to WaterNSW approval). All regulatory approvals will be secured prior to commencement of dewatering.

Final discharge arrangements, including treatment requirements and discharge points, will be confirmed in consultation with Ku-ring-gai Council and relevant regulatory authorities prior to dewatering.

6.14.6 Mitigation, Monitoring and Management

Dewatering and groundwater impacts will be managed through implementation of the approved Dewatering Management Plan, which includes:

- controlled sump-and-pump dewatering techniques;
- groundwater level, volume and quality monitoring before, during and after dewatering;
- trigger levels and response actions for groundwater drawdown and water quality;
- treatment of groundwater prior to discharge to meet Council and EPA requirements;
- implementation of water treatment systems where required to address elevated metals, pH and microbial indicators identified during groundwater screening;
- documentation of water take volumes and reporting to the Natural Resource Access Regulator; and
- preparation of a Dewatering Completion Report at the conclusion of works.

Monitoring wells installed around the site will remain active to verify predicted impacts and ensure compliance throughout construction.

6.14.7 Assessment of Impacts

With the implementation of the proposed management measures:

- groundwater drawdown will be localised and temporary;
- surrounding properties and infrastructure will not be adversely affected;
- no impacts to groundwater users or groundwater-dependent ecosystems are expected; and
- groundwater quality risks will be appropriately managed through treatment and regulatory oversight.

6.14.8 Conclusion

The combined geotechnical, groundwater and dewatering investigations demonstrate that the proposed development is acceptable from a geology, groundwater and aquifer interference perspective.

Subject to implementation of the Dewatering Management Plan and securing the required approvals under the Water Management Act 2000, the proposal will not result in unacceptable environmental impacts and is consistent with best-practice urban basement construction in dense metropolitan settings

6.15 Civil Works, Stormwater and Public Domain Integration

6.15.1 Overview

This section assesses the civil engineering aspects of the proposed mixed-use development, including site grading, vehicle access, stormwater drainage, erosion and sediment control, and public domain works.

The assessment responds to the SEARs and is supported by a suite of DA-stage Civil Engineering Drawings prepared by van der Meer Consulting (September 2025), included at Appendix DD.

The civil design has been developed in coordination with the architectural, traffic, flood, geotechnical and landscape design to ensure an integrated and functional outcome that minimises environmental impacts.

6.15.2 Site Levels and Earthworks

The site is characterised by a ridgeline condition along the Pacific Highway, with land generally falling toward Radford Place and Dumaresq Street. The civil design adopts finished surface levels that respond to existing street grades and surrounding development.

Key principles include:

- minimisation of cut and fill to the extent practicable;
- smooth grade transitions at all property boundaries;
- coordination of ground floor and basement levels with flood-free thresholds; and
- integration of surface grading with landscape design and public domain works.

Earthworks are localised to the development footprint and basement excavation and will not adversely affect adjoining land or public infrastructure.

6.15.3 Vehicle Access and Basement Entry

Vehicle access to the development is provided from Radford Place, minimising traffic impacts on the Pacific Highway and Dumaresq Street.

The civil drawings demonstrate that:

- two compliant basement driveway crossings are provided from Radford Place;
- driveway grades and transitions comply with relevant Australian Standards and Council specifications;
- loading dock access is separated from residential access to improve safety and operational efficiency; and
- existing laybacks and kerb crossings are modified only where required and reinstated in accordance with Ku-ring-gai Council standards.

Detailed driveway plans and longitudinal sections are provided in Civil Drawings (Appendix DD) and confirm that safe and efficient vehicular access can be achieved without adverse impacts on the surrounding road network.

6.15.4 Stormwater Drainage and Water Quality

A comprehensive stormwater drainage system has been designed to manage runoff from all levels of the development and safely convey flows to the downstream drainage network.

Key features include:

- collection of roof and podium runoff via internal drainage systems;
- on-site detention (OSD) to limit discharge rates to pre-development conditions;
- integration of a stormwater quality (SWQ) treatment train, including filtration and gross pollutant capture; and
- controlled discharge to Council's stormwater system via approved kerb outlets.

Stormwater infrastructure is coordinated with basement levels, building services and landscape works to ensure long-term performance and maintainability. The detailed drainage layouts for the loading dock, ground floor and upper levels are provided in Appendix DD.

6.15.5 Erosion and Sediment Control

Erosion and sediment controls will be implemented during construction in accordance with:

- Managing Urban Stormwater – Soils and Construction (Landcom, "the Blue Book"); and
- Ku-ring-gai Council requirements.

The Erosion and Sediment Control Plan includes:

- perimeter sediment fencing;
- inlet protection and sediment traps;
- stabilised construction vehicle access points;
- controlled stockpile locations; and
- progressive stabilisation and revegetation of disturbed areas.

These measures will minimise off-site sedimentation impacts and protect downstream receiving environments throughout the construction period

6.15.6 Public Domain Works

Public domain works along Pacific Highway, Dumaresq Street and Radford Place are designed to integrate seamlessly with Council's adopted Public Domain Plan.

Works include:

- reinstatement and upgrade of footpaths and kerb and gutter where affected;
- provision of new laybacks and vehicular crossings where required;
- coordination of levels to ensure universal access and safe pedestrian movement; and
- integration with landscape works, street trees and services.

All works within the public road reserve will be undertaken in accordance with Council specifications and subject to separate approvals as required.

6.15.7 Mitigation and Management Measures

Civil-related environmental impacts will be managed through:

- implementation of approved erosion and sediment controls prior to site disturbance;
- staged earthworks to limit exposed areas;
- regular inspection and maintenance of stormwater and sediment controls;
- compliance with Council specifications for all public domain works; and
- certification of civil works at construction and completion stages.

6.15.8 Conclusion

The civil engineering design demonstrates that the proposed development can be safely serviced and integrated into the surrounding urban environment without adverse impacts on drainage, access, public infrastructure or the public domain.

Subject to implementation of the approved civil works, erosion and sediment controls and stormwater management measures, the proposal is considered acceptable from a civil engineering perspective and consistent with relevant SEARs and Council requirements.

6.16 Infrastructure and Utilities

The Infrastructure and Utilities Assessment, included at Appendix N, evaluates the capacity of existing utility networks and the ability to service the proposed development.

The assessment has been prepared in response to the Planning Secretary's Environmental Assessment Requirements (SEARs) issued on 9 December 2025, and specifically addresses SEARs Item 11 – Infrastructure Requirements and Utilities, which requires the EIS to:

- detail the proposed drainage design and servicing infrastructure to be incorporated as part of the development, including stormwater and wastewater; and
- demonstrate compliance with Council's drainage requirements, including the identification of stormwater treatment and water quality management measures to minimise adverse environmental impacts.

The Infrastructure and Utilities Assessment has been prepared in consultation with the relevant service providers, including Sydney Water and Jemena, and has been prepared having regard to the applicable Sydney Water Codes, State guidelines and authority requirements. Its findings have been integrated into this EIS to inform the overall assessment of the project's suitability and deliverability.

6.16.1 Existing Infrastructure Context

6.16.1.1 Sewerage Infrastructure

Based on Sydney Water hydra plot data obtained through Before-You-Dig Australia (BYDA), an existing 150mm vitrified clay (VC) sewer main is located within Radford Place, terminating near the

north-western boundary of the site. This infrastructure forms the primary point of potential wastewater connection for the development.

6.16.1.2 Potable Water Infrastructure

The existing potable water network includes:

- A 150mm ductile iron cement lined (DICL) water main located within Dumaresq Street along the southern boundary of the site; and
- Larger diameter 300mm and 600mm water mains within the Pacific Highway corridor.

Hydraulic data provided by Sydney Water confirms adequate pressure and flow capacity within the existing network to service the proposed development, subject to formal confirmation under the Section 73 process.

6.16.1.3 Recycled Water

There are no recycled (non-potable) water mains currently available within or adjacent to the site. As such, no recycled water connection is proposed.

6.16.1.4 Gas

An existing 32mm 210kPa gas main is located within Dumaresq Street. However, the proposed development is fully electrified, and Jemena has confirmed that the existing gas infrastructure does not have sufficient capacity to service the development. Accordingly, gas is not required.

6.16.2 Proposed Infrastructure Servicing Strategy

6.16.2.1 Sewerage Servicing

The Infrastructure Report concludes that while the existing sewer network can ultimately accommodate the development, local sewer amplification works are required. Specifically:

- Construction of a new 225mm sewer sideline connecting to the existing 150mm sewer main in Radford Place;
- Installation of a new sewer manhole and local adjustment of the existing sewer alignment; and
- Connection designed and delivered in accordance with Sydney Water Sewerage Code of Australia (WSA 02).

Preliminary equivalent population (EP) calculations indicate a total demand equivalent to approximately 3,743 EP, supporting the need for a 225mm connection. All sewer works will be designed, constructed, tested and commissioned prior to the issue of Occupation Certificates and funded by the developer, with final requirements to be confirmed via Sydney Water's Section 73 Notice of Requirements.

6.16.2.2 Water Supply

The development will be serviced by a new 150mm potable water connection from the existing Dumaresq Street main, providing:

- Cold water supply;
- Fire hydrant supply; and
- Fire sprinkler supply.

Sydney Water pressure and flow testing confirms that the existing network can accommodate the developments:

- Maximum daily demand of approximately 99 kL/day; and
- Peak flow demand of approximately 13.8 L/s.

Final connection arrangements and any minor amplification works will be determined through the Section 73 application process.

6.16.2.3 Stormwater Drainage and Water Quality

Stormwater management for the site is addressed through the broader civil engineering design package and has been prepared to comply with:

- Ku-ring-gai Council drainage requirements; and
- Relevant NSW water quality and stormwater management standards.

Stormwater treatment measures will be incorporated to minimise adverse environmental impacts and protect downstream receiving environments, consistent with SEARs requirements for water management

6.16.2.4 Authority Consultation and Approvals

The Infrastructure Report has been prepared in consultation with the following authorities:

- Sydney Water (water and sewer services); and
- Jemena (gas infrastructure).

Following the grant of development consent, the proponent will lodge a Section 73 application with Sydney Water, which will confirm:

- The adequacy of existing infrastructure;
- The scope of required amplification works;
- Developer contributions and charges; and
- Building plan approval requirements.

6.16.3 Infrastructure and Utilities Summary

The Infrastructure and Utilities Assessment demonstrates that the proposed development:

- Is capable of being serviced by existing water, wastewater and utility networks within the Gordon town centre, subject to identified localised upgrades;
- Requires only targeted and manageable augmentation of infrastructure, including sewer amplification works, consistent with authority servicing requirements;
- Can be supported through established approval pathways, including the Sydney Water Section 73 process, with all required works to be delivered prior to occupation; and
- Will not result in unacceptable impacts on existing utility networks or public infrastructure, having regard to proposed mitigation and servicing arrangements.

Accordingly, the proposal is considered acceptable from an infrastructure and utilities perspective and consistent with State and local planning objectives for intensified, mixed-use development in highly serviced centre locations.

6.17 Transport, Traffic, Parking and Access

The Traffic Impact Assessment (TIA) included at Appendix R evaluates the potential transport, traffic and access impacts associated with the proposed development. Key findings and mitigation measures are summarised below to demonstrate the proposal's acceptability, rather than relying solely on the detailed technical assessment.

The assessment has been prepared in accordance with the TfNSW Guide to Transport Impact Assessment (GITA) and responds to the SEARs for State Significant Development (SSD-101444458).

It considers existing traffic conditions, forecast development-generated traffic, intersection performance, parking provision, access arrangements, cumulative impacts, and travel demand management within the Gordon Town Centre context.

A Green Travel Plan (GTP) has also been prepared for the development and is provided at Appendix NN. The GTP complements the TIA by establishing measures to encourage sustainable travel behaviour and manage travel demand over time, consistent with the site's transit-oriented location.

6.17.1 Existing Transport Context

6.17.1.1 Road Network and Hierarchy

The site is located within the Gordon Town Centre and is bounded by a mix of State and local roads, including:

- Pacific Highway (State Road) – a six-lane divided arterial road forming the primary north–south movement corridor;
- Dumaresq Street – a local east–west connector linking the site to the Pacific Highway;
- Park Avenue – a local east–west street forming part of the town centre grid; and
- Radford Place – a low-speed local access street providing direct vehicular access to the site.

Consistent with access management principles, all site access is proposed via Radford Place, avoiding new or intensified direct access to the Pacific Highway.

6.17.1.2 Public Transport Accessibility

The site benefits from high public transport accessibility, being located within approximately 200 metres walking distance of Gordon Railway Station. The station is serviced by:

- T1 North Shore Line, with peak services every 3–6 minutes; and
- T9 Northern Line, with frequent peak and off-peak services.

Multiple bus routes operate along Pacific Highway and in the immediate vicinity of Gordon Station, providing frequent connections to Macquarie University, Mona Vale, St Ives, West Pymble and surrounding centres.

This level of accessibility underpins the traffic modelling assumptions adopted in the TIA and supports reduced private vehicle mode share assumptions reflected in both the traffic assessment and the Green Travel Plan.

6.17.1.3 Active Transport

Pedestrian accessibility within the Gordon Town Centre is strong, with continuous footpaths and an established walking catchment. While cycling infrastructure exists within the broader area, local topography and limited on-street facilities constrain cycling uptake.

Notwithstanding these constraints, the development provides compliant on-site bicycle parking and end-of-trip facilities in accordance with AS2890.3. These facilities form a key component of the Green Travel Plan and are intended to support increased uptake of walking and cycling for short trips, particularly for residents, staff and visitors accessing the town centre and public transport.

6.17.2 Existing Traffic Conditions

Traffic surveys were undertaken in February 2025 (non-school holiday period) during weekday AM and PM peaks and the Saturday peak. The following key intersections were assessed:

- Pacific Highway / Park Avenue;
- Pacific Highway / Dumaresq Street; and
- Dumaresq Street / Radford Place.

SIDRA Intersection modelling indicates that, under existing conditions:

- Local intersections generally operate at Level of Service (LoS) A to C during most peak periods;
- The Pacific Highway / Dumaresq Street intersection experiences congested PM peak conditions, reflecting existing background traffic demand rather than site-related activity; and
- Queuing and delays are already influenced by broader town centre traffic patterns and signal phasing on the Pacific Highway.

6.17.3 Development Trip Generation

Development traffic generation has been derived in accordance with GITA rates for high-density residential development with high public transport accessibility, and town centre retail uses. These rates are consistent with the travel behaviour assumptions adopted in the Green Travel Plan.

6.17.3.1 Weekday Peak Traffic Generation

The proposed development is forecast to generate approximately:

- 67 vehicle trips in the weekday AM peak hour; and
- 93 vehicle trips in the weekday PM peak hour,

inclusive of residential, supermarket and small-scale commercial components.

6.17.3.2 Saturday Peak Traffic Generation

During the Saturday peak hour, the development is forecast to generate approximately 94 vehicle trips, driven primarily by retail activity, with residential trips moderated by lower weekend car mode share assumptions.

These traffic volumes are modest in the context of Pacific Highway flows and are consistent with town centre mixed-use development expectations.

6.17.4 Traffic Distribution and Assignment

Development traffic has been distributed based on established journey-to-work patterns and prior traffic modelling undertaken for the Gordon Town Centre. Key distribution characteristics include:

- The majority of trips accessing the Pacific Highway northbound and southbound;
- Limited eastbound movements on Dumaresq Street and Park Avenue; and
- No reliance on Radford Place beyond site access movements.

This distribution reflects the site's strategic position within the wider arterial network and minimises impacts on surrounding local streets.

6.17.5 Intersection Performance with Development

SIDRA modelling was undertaken for the following scenarios:

- Existing weekday and Saturday peak conditions; and
- Existing conditions plus development traffic, including infrastructure upgrades required under the existing consent.

6.17.5.1 Pacific Highway Right-Turn Lane Upgrade

Consistent with Condition 126 of DA0610/17, the assessment assumes the extension of the southbound right-turn lane on Pacific Highway by 40 metres. This upgrade mitigates queuing and maintains acceptable traffic performance at the Pacific Highway/Dumaresq Street intersection.

6.17.5.2 Post-Development Performance

With the inclusion of development traffic and the right-turn lane extension:

- Local access intersections (including Dumaresq Street / Radford Place) continue to operate at LoS A across all assessed peak periods;
- The Pacific Highway / Park Avenue intersection maintains acceptable LoS (B–C); and
- While the Pacific Highway / Dumaresq Street intersection remains constrained during the weekday PM peak, modelling demonstrates that development traffic does not materially worsen intersection performance beyond existing conditions.

Overall, the road network can accommodate the proposed development traffic without unacceptable impacts, and the TIA confirms that no additional turning lanes or left-turn capacity from Dumaresq Street are required to support the proposed development.

6.17.6 Parking and Access Implications

The development proposes 269 on-site car parking spaces, consistent with the applicable Housing SEPP parking rates and Council controls when accounting for proximity to rail services and the affordable housing component.

Vehicular access arrangements have been designed to comply with the AS2890 suite, including:

- Separate residential and service access via Radford Place;
- Adequate provision for large articulated supermarket deliveries; and
- Internal circulation, queuing and clearance arrangements that avoid impacts on the public road network.

The proposed parking provision is supported by the Green Travel Plan (Appendix NN), which establishes an ongoing framework for travel demand management, including baseline data collection, periodic surveys, monitoring of mode share outcomes and adaptive management over time.

6.17.7 Cumulative and Future Context

The assessment acknowledges longer-term transport upgrades within the Gordon Town Centre identified in earlier Council and TfNSW strategic studies, including potential additional capacity on the Pacific Highway and Dumaresq Street approaches.

These upgrades are not required to support the proposed development and are not relied upon for feasibility or traffic acceptability. The only road upgrade required by the proposal is the approved southbound right-turn lane extension on Pacific Highway, which has already been secured under the existing consent. Land required for potential future road upgrades has also been dedicated in accordance with that consent.

6.17.8 Traffic Impact Assessment Summary

The Traffic Impact Assessment demonstrates that the proposed development:

- Is appropriately located within a high-accessibility town centre environment;
- Generates traffic volumes that are modest and consistent with the site's zoning and strategic role;
- Can be accommodated by the surrounding road network with the implementation of the approved Pacific Highway right-turn lane extension; and

- Will not result in unacceptable traffic, safety or access impacts on the surrounding transport network.

When considered alongside the Green Travel Plan, which provides an additional operational layer to promote sustainable travel choices and manage travel demand over time, the proposal is considered acceptable from a transport, traffic and car parking perspective, and consistent with State and local planning objectives for transit-oriented, mixed-use development.

6.18 Trees and Landscaping

The Landscape Design Report is included at Appendix O, and details the proposed landscape strategy for the development.

This assessment responds to the SEARs, and specifically addresses SEARs Item 14 – Trees and Landscaping, which requires the EIS to:

- provide a landscape plan detailing proposed site planting, including species selection, location, heights at maturity and canopy coverage;
- demonstrate that opportunities to retain and protect significant trees have been explored; and
- where tree impacts are proposed, address tree relocation, replacement and long-term management.

The landscape design has been developed in coordination with the architectural, civil and servicing design and responds to the site's urban context, public domain interfaces and consent history.

6.18.1 Landscape Vision and Design Principles

The landscape vision seeks to deliver a high-quality public and communal domain that supports pedestrian permeability, resident amenity and social interaction, while reinforcing Gordon's role as a strategic centre.

Key principles include:

- creation of a legible and welcoming ground plane, particularly at street level and through the public laneway;
- reinforcement of local character and materiality, drawing on North Shore landscape cues;
- enhancement of urban canopy and biodiversity through predominantly native and climate-resilient planting; and
- conservation and re-use of valued existing landscape elements where feasible.

6.18.2 Public Realm and Communal Open Space

The proposal incorporates a network of publicly accessible and communal landscape spaces, including:

- a public pedestrian laneway linking Pacific Highway and Radford Place, improving permeability and providing a safer alternative to the Pacific Highway footpath;
- landscaped podium-level communal open space supporting both active and passive recreation; and
- rooftop terrace spaces designed as elevated gardens, providing outlook, shade and social amenity.

These spaces are designed to provide a diversity of landscape experiences while maintaining a cohesive design language across the development.

6.18.3 Planting Strategy, Canopy and Tree Management

The planting strategy prioritises locally appropriate native species, supported by soil-on-structure systems that enable long-term canopy establishment on podiums and rooftops.

Key outcomes include:

- provision of new canopy trees and understorey planting to enhance urban greening and microclimate performance;
- achievement of an overall landscape canopy contribution of approximately 112.5 m² across the site;
- careful coordination with building services, structures and basement extents; and
- a considered approach to tree management that prioritises retention and relocation over removal where feasible.

6.18.3.1 Retention and Protection of Adjacent Trees

An Arboriculture Inspection and Compliance Report prepared by Woodside Consulting (August 2025) (Appendix AA) confirms that appropriate tree protection measures have been installed and inspected in accordance with the existing development consent and AS 4970 – Protection of Trees on Development Sites.

In particular:

- Tree T21 (*Casuarina cunninghamiana*), located on Council land immediately adjacent to the northern boundary, has been protected through the installation of compliant trunk and branch protection prior to the commencement of works;
- tree identification tagging has been undertaken to ensure all retained, relocated and removed trees align with the approved arboricultural documentation; and
- the installed protection measures were independently inspected by a suitably qualified arborist (AQF Level 5) and confirmed to be satisfactory and compliant.

These protection measures will remain in place for the duration of construction, with ongoing inspections and arboricultural oversight to ensure no adverse impacts occur to retained trees.

6.18.3.2 Retention and Relocation of Phoenix Palm

A mature Phoenix canariensis (Canary Island Date Palm) located within the site has been identified as a tree of local landscape and amenity value. While direct in-situ retention is not feasible due to basement and podium construction, the landscape strategy incorporates the relocation and transplanting of the palm, consistent with the existing development consent (DA-0610-17).

An Arboricultural Assessment and Tree Transplanting Methodology prepared by Tree Transplanters Australia Pty Ltd confirms that the palm is in generally good health, exhibits satisfactory vigour, and is a species well suited to transplantation, with a high likelihood of successful re-establishment when managed in accordance with best-practice procedures.

The relocation strategy includes:

- preparation of a suitably sized root plate and specialist lifting and transport techniques;
- maintenance of the tree's original orientation during relocation;
- temporary on-site or off-site storage if required to accommodate construction staging; and
- reinstatement of the palm within the completed landscape as a feature tree, contributing to canopy, identity and continuity with the site's historical landscape character.

A minimum 52-week re-establishment and aftercare program will be implemented, including irrigation, mulching, soil conditioning and arboricultural monitoring, to ensure long-term viability.

The relocation of the Phoenix palm demonstrates a balanced and conservation-led approach to tree management, consistent with SEARs expectations and urban design best practice.

6.18.4 Trees and Landscaping Summary

The Landscape Design demonstrates that the proposed development:

- provides a high-quality public realm and communal open spaces that enhance pedestrian connectivity and resident amenity;
- integrates landscape design with the site's urban, cultural and ecological context;
- enhances urban canopy and biodiversity through new planting and soil-on-structure systems;
- retains and relocates a mature Phoenix palm of local amenity value through a best practice transplanting and aftercare regime; and
- manages tree retention, relocation and replacement in a manner consistent with SEARs Item 14 and relevant consent requirements.

Accordingly, the proposal is considered acceptable from a landscape and public domain perspective and consistent with State and local planning objectives for high-quality, place-based outcomes within strategic centre locations.

6.19 Waste Management

6.19.1 Overview

This section addresses waste generation, handling, storage, collection and disposal associated with both the construction and operational phases of the proposed mixed-use development.

The assessment responds to SEARs Item 17 – Waste Management, which requires the EIS to identify measures to manage, reuse, recycle and safely dispose of waste in accordance with Council and State requirements, and to demonstrate that appropriate waste storage areas, collection access and servicing arrangements have been provided.

The assessment is informed by the following specialist reports prepared by Elephants Foot Consulting:

- Construction & Demolition Waste Management Plan (C&D WMP) – 17 December 2025 - Appendix K
- Operational Waste Management Plan (OWMP) – 17 December 2025 (Revision E) - Appendix P

6.19.2 Policy and Regulatory Context

Waste management for the development has been designed to be consistent with:

- Waste Avoidance and Resource Recovery Act 2001;
- Protection of the Environment Operations Act 1997;
- NSW Waste Avoidance and Resource Recovery Strategy;
- NSW EPA Waste Classification Guidelines;
- Ku-ring-gai Local Environmental Plan 2015; and
- Ku-ring-gai Development Control Plan 2024 – Part 25 Waste Management.

The waste strategy also aligns with NSW Better Practice Guidelines for resource recovery in residential and commercial developments.

6.19.3 Construction and Demolition Waste

The Construction & Demolition Waste Management Plan establishes a framework for managing waste generated during demolition, excavation and construction activities.

Key principles include:

- maximisation of **waste avoidance, reuse and recycling** consistent with the waste hierarchy;
- separation of waste streams at source wherever practicable;
- classification of all waste in accordance with NSW EPA guidelines; and
- lawful transport and disposal of waste at appropriately licensed facilities.

The C&D WMP identifies typical waste streams including concrete, masonry, metals, timber, soils, packaging and general construction waste. Recyclable materials will be segregated on-site and removed by licensed contractors, with waste tracking and record keeping maintained throughout construction.

Implementation of the C&D WMP will minimise landfill disposal and ensure that construction-phase waste does not result in adverse environmental impacts.

6.19.4 Operational Waste – Residential Component

The Operational Waste Management Plan provides a comprehensive strategy for the ongoing management of waste generated by 180 residential dwellings.

Key features include:

- provision of separate waste streams for general waste, co-mingled recycling, paper/cardboard recycling and Food Organics and Garden Organics (FOGO) (to accommodate future Council services);
- waste disposal via vertical chute systems supported by bin carousel and compaction equipment at chute discharge points;
- appropriately sized waste rooms, bin holding areas and circulation paths located within the basement levels; and
- weekly Council collections coordinated through a centralised loading dock accessed from Radford Place.

Waste generation rates and bin numbers have been calculated in accordance with Ku-ring-gai DCP requirements and allow flexibility for adjustment by building management should waste volumes vary over time.

6.19.5 Operational Waste – Retail and Supermarket Uses

Separate waste management arrangements are provided for the retail tenancies and supermarket to ensure appropriate segregation of waste streams.

Key provisions include:

- dedicated retail waste rooms and storage areas separate from residential waste facilities;
- private waste contractors servicing retail and supermarket waste to avoid conflicts with Council residential collections;
- provision for recycling of cardboard, packaging and other recoverable materials generated by commercial uses; and
- management of liquid and problem wastes in accordance with EPA requirements.

Supermarket waste will be managed entirely within the loading dock area by the tenant's appointed contractor, consistent with industry best practice.

6.19.6 Waste Storage, Collection and Amenity

All waste rooms and storage areas are designed to:

- be accessible and functional for building management and collection staff;
- minimise noise, odour and visual impacts through appropriate enclosure, ventilation and cleaning regimes;
- provide sufficient space for bin manoeuvring and equipment; and
- integrate with the site's loading dock and servicing strategy without impacting the public domain.

Bin movement paths, collection vehicle access and loading arrangements have been coordinated with the traffic and civil design to ensure safe and efficient operations.

6.19.7 Mitigation and Management Measures

Waste-related impacts will be mitigated through:

- implementation of the approved C&D WMP during construction;
- implementation of the OWMP during operation;
- ongoing review of waste generation rates and collection frequencies to reflect actual operational demand;
- education and signage to promote correct source separation;
- ongoing monitoring and adjustment of bin numbers and collection frequencies by building management; and
- regular cleaning and maintenance of waste facilities.

6.19.8 Conclusion

The proposed waste management arrangements demonstrate that:

- construction and operational waste can be effectively managed, reused and recycled in accordance with best practice;
- adequate waste storage areas, collection access and servicing arrangements have been provided; and
- the development will not result in unacceptable waste-related environmental or amenity impacts.

Subject to implementation of the approved waste management plans, the proposal is considered acceptable from a waste management perspective and consistent with SEARs Item 17, State policy and Ku-ring-gai Council requirements.

6.20 Ecologically Sustainable Development (ESD)

6.20.1 Overview

This section summarises the Ecologically Sustainable Development (ESD) measures incorporated into the proposed development. A detailed ESD Report (Appendix W) has been prepared by Credwell Energy Pty Ltd (December 2025) to address the SEARs and demonstrate consistency with relevant State and local sustainability policies. Compliance is further supported by BASIX certification, NatHERS modelling and embodied emissions reporting appended to this EIS (Appendix MM).

The ESD strategy has been developed to minimise greenhouse gas emissions, reduce energy and water consumption, promote responsible material selection, support climate resilience, and ensure long-term environmental performance consistent with the principles of sustainable development.

6.20.2 Policy Framework and Assessment Basis

The ESD measures have been assessed having regard to:

- Section 193 of the Environmental Planning and Assessment Regulation 2021 (ESD principles);
- State Environmental Planning Policy (Sustainable Buildings) 2022;
- Ku-ring-gai Local Environmental Plan 2015;
- National Construction Code (NCC) 2022 – Section J;
- BASIX requirements for residential components; and
- The NSW Government objective of achieving net zero emissions by 2050.

The ESD Report confirms that the proposed development meets or exceeds applicable sustainability standards and appropriately addresses the SEARs relating to ESD.

6.20.3 Application of ESD Principles

The principles of ecologically sustainable development, as defined in section 6(2) of the Protection of the Environment Administration Act 1991, have been applied in assessing the proposal. The proposal demonstrates consistency with the principles of ESD through:

- **Precautionary Principle** – implementation of integrated water management, stormwater treatment systems and remediation measures to prevent environmental harm.
- **Intergenerational Equity** – delivery of housing (including affordable housing) in a highly accessible location close to public transport, reducing long-term transport emissions and supporting future generations.
- **Conservation of Biodiversity and Ecological Integrity** – protection of retained trees, use of endemic and native planting, and implementation of remediation and construction controls.
- **Improved Valuation, Pricing and Incentive Mechanisms** – adoption of waste minimisation, recycling initiatives and energy efficiency measures that reduce whole-of-life environmental costs.

6.20.4 Key ESD Initiatives

6.20.4.1 Energy Efficiency and Emissions Reduction

- All-electric building services, including cooking and hot water systems.
- High-efficiency appliances, lighting and building services consistent with BASIX requirements.
- Rooftop solar photovoltaic (PV) system sized to meet BASIX minimum peak capacity, with future provision for battery storage.
- Enhanced building fabric, including insulation and glazing, to improve thermal performance and reduce heating and cooling demand.
- Smart metering to enable real-time monitoring of energy consumption.

6.20.4.2 Water Conservation and Stormwater Management

- A minimum 15kL rainwater tank for non-potable reuse.
- Water-efficient fixtures and fittings achieving a minimum 4-star WELS rating.

- Integrated stormwater treatment system incorporating proprietary filtration devices and on-site detention to meet Ku-ring-gai Council pollutant reduction targets.
- Water-sensitive urban design measures integrated with landscaping and public realm areas.

6.20.4.3 Sustainable Materials and Waste Management

- Selection of materials with reduced embodied carbon, including recycled and reused content, sustainably sourced timber and steel, and products with Environmental Product Declarations (EPDs). Embodied emissions reporting has been undertaken in accordance with NSW SEPP requirements and is documented in Appendix MM.
- Use of low-VOC paints, adhesives, sealants, carpets and engineered timber products.
- Implementation of an Operational Waste Management Plan to maximise recycling and minimise landfill during construction and operation.

6.20.4.4 Passive Design and Climate Resilience

- Building orientation, glazing and layouts designed to maximise natural light and ventilation.
- High-performance insulation and airtightness measures to reduce energy demand.
- Design measures to support climate change adaptation, including consideration of future heat, water scarcity and extreme weather events.

6.20.4.5 Transport and Accessibility

- Transit-oriented location within walking distance of Gordon Station.
- Provision of 303 resident bicycle spaces and 36 visitor bicycle spaces.
- Support for active transport, reduced car dependence and lower transport-related emissions.

6.20.5 Conclusion

The ESD Report demonstrates that the proposed development integrates ESD principles into its design, construction and ongoing operation. The proposal meets relevant statutory requirements, aligns with State sustainability objectives, and incorporates practical measures to minimise environmental impacts, reduce emissions and resource consumption, and support long-term resilience.

Subject to implementation of the identified ESD measures and ongoing compliance with BASIX, NCC and SEPP (Sustainable Buildings) 2022 requirements, the development is considered to deliver an appropriate and robust sustainability outcome consistent with the objectives of State Significant Development. These commitments are secured through the mitigation measures schedule at Appendix D and relevant conditions of consent.

7 Justification of the Project

This chapter provides an integrated justification for the proposed development, having regard to the economic, social and environmental impacts of the project and the principles of ecologically sustainable development (ESD). It synthesises the findings of the preceding chapters of the EIS and evaluates the proposal in the context of strategic policy, statutory requirements, site suitability and the public interest.

The assessment demonstrates that the proposal achieves a net public benefit, represents an orderly and economic use of land, and is suitable for approval under the State Significant Development framework, subject to appropriate mitigation measures and conditions of consent.

7.1 Project Impacts

The proposed redevelopment of 810 Pacific Highway, Gordon has been designed to optimise positive outcomes while avoiding or minimising potential impacts through careful site planning, building design, infrastructure coordination and targeted mitigation measures.

The assessment contained in Chapter 6 confirms that potential impacts have been appropriately identified, assessed and mitigated, and that no residual impacts have been identified that would warrant refusal of the application, noting that construction and operational impacts are to be managed through established mitigation and regulatory frameworks.

7.1.1 Economic Impacts

The project delivers substantial and enduring economic benefits at both the local and metropolitan scale.

Key economic benefits include:

- **Increased housing supply**, including 180 dwellings within an established and highly accessible centre, directly contributing to housing delivery targets under the National Housing Accord and broader State housing objectives;
- **Delivery of 39 affordable dwellings**, secured through statutory mechanisms and managed by a registered Community Housing Provider, providing meaningful and long-term affordability outcomes within the Gordon Local Centre;
- Significant employment generation, comprising:
    - approximately **308 jobs during the construction phase**, supporting a broad range of trades, consultants, suppliers and associated industries over the multi-year build program; and
    - approximately **135 ongoing operational jobs** following completion, including employment associated with the full-line ALDI supermarket, supporting retail tenancies, building management and facilities operations;
- **Activation and revitalisation of a prominent site within the Gordon Centre**, reinforcing Gordon's role as a mixed-use strategic centre, increasing daytime and evening economic activity, and supporting the viability of surrounding businesses; and
- **Efficient utilisation of existing infrastructure**, including transport, utilities and community facilities, reducing the need for significant new infrastructure investment and enabling economically sustainable urban consolidation.

The construction phase represents a substantial capital investment of approximately $142.6 million, generating direct employment across the building and civil construction sectors and indirect employment through supply chains, materials procurement, transport, professional services and local expenditure. The operational phase will provide stable, long-term employment opportunities within

walking distance of Gordon Railway Station, supporting transit-oriented employment and reinforcing the economic resilience of the centre.

Importantly, the economic feasibility analysis confirms that the proposed affordable housing outcome represents the maximum deliverable and feasible quantum achievable while maintaining project viability. The adopted approach avoids non-delivery risk associated with infeasible cumulative obligations and ensures that both market and affordable housing outcomes are realised in practice.

Collectively, these economic benefits demonstrate that the proposal will make a meaningful and sustained contribution to the local economy, the Northern District and the broader Greater Sydney metropolitan region.

7.1.2 Social Outcomes

The proposal delivers a range of positive social outcomes, including:

- Provision of diverse housing types, including one-, two- and three-bedroom dwellings, accommodating a broad range of household types;
- Affordable housing delivery, supporting key workers, lower-income households and those seeking housing close to public transport and services;
- Enhanced accessibility and inclusion, with universal design principles incorporated throughout the development;

- Improved public domain and pedestrian connectivity, including a new east–west pedestrian link enhancing safety and permeability;
- Access to essential services, including a supermarket within walking distance of existing and future residents.

These outcomes support stronger, more inclusive communities and reinforce Gordon's role as a vibrant and accessible centre.

7.1.3 Environmental Outcomes

Environmental impacts associated with the proposal have been assessed and can be appropriately managed through design measures, mitigation and conditions of consent. Positive outcomes include:

- Transit-oriented development, reducing car dependence through proximity to rail and bus services;
- Efficient land use, concentrating growth within an established centre and avoiding greenfield expansion;
- Sustainable building design, incorporating ESD principles, energy efficiency and water management measures;
- High waste diversion rates during construction, exceeding NSW recovery targets;
- Improved urban amenity, including enhanced streetscapes, landscaping and microclimate performance.

Specialist assessments confirm that impacts relating to wind, traffic, utilities, flooding, heritage, contamination and groundwater are acceptable and manageable, noting that groundwater quality management, dewatering controls and excavation-related safeguards are addressed through site-specific mitigation measures and regulatory approval pathways documented in the EIS.

7.2 Consistency with Strategic Policy

The proposal is strongly aligned with State, regional and local strategic planning frameworks, including:

- NSW Government housing and transport-oriented development priorities;
- The objectives of the Draft Sydney Plan and Greater Sydney Region Plan for compact, well-connected urban growth;
- The Northern District Plan's emphasis on housing delivery within centres;
- Ku-ring-gai Local Strategic Planning Statement priorities for housing diversity, affordability and centre revitalisation; and
- Future Transport Strategy 2056 objectives for integrated land use and transport outcomes.

By locating additional housing and affordable housing within walking distance of Gordon Station and services, the proposal directly advances these strategic objectives.

7.3 Compliance with Statutory Requirements

The EIS demonstrates comprehensive compliance with applicable statutory requirements, including:

- Environmental Planning and Assessment Act 1979 and Regulation 2021;
- Planning Systems SEPP SSD declaration framework;
- Housing SEPP infill affordable housing provisions, including delivery and management requirements;
- *Ku-ring-gai LEP 2015* permissibility controls and affordable housing provisions;
- Relevant State Environmental Planning Policies and the ADG.

Statutory compliance has been documented through the:

- SEARs Compliance Table (Appendix A);
- Statutory Compliance Table (Appendix B); and
- Amending DA Conditions Table (Appendix E).

Ongoing compliance will be secured through conditions of consent, construction certification, regulatory approvals and operational management plans, as appropriate.

7.4 Consideration of Community Views

Community engagement has been undertaken in accordance with statutory requirements. Issues raised by agencies and the community will inform design refinement and assessment, including matters relating to traffic, amenity, built form and construction management.

The EIS demonstrates that community and agency feedback has been sought transparently, with reasonable and proportionate mitigation measures incorporated where appropriate.

7.5 Site Suitability

The site is highly suitable for the proposed development due to:

- its location within the Gordon Local Centre;
- proximity to high-frequency public transport;
- existing zoning supporting mixed-use and shop-top housing;
- availability of existing infrastructure and services; and
- prior development approval establishing the principle of redevelopment.

The proposal represents a logical and efficient intensification of an already disturbed site, noting that site-specific constraints such as excavation and groundwater conditions can be appropriately managed through detailed design and construction controls.

7.6 The Public Interest

The proposal is in the public interest as it:

- delivers additional housing and affordable housing in a highly accessible location;
- supports NSW Government housing supply and affordability objectives;
- optimises use of existing infrastructure and public investment;
- enhances the vitality, safety and functionality of the Gordon Centre; and
- provides economic, social and environmental benefits that outweigh any identified impacts.

7.7 Conclusion

This Environmental Impact Statement provides a comprehensive assessment of the anticipated environmental, economic and social impacts of the development proposed in this SSDA. The EIS addresses the requirements of the SEARs and the *Environmental Planning and Assessment Regulation 2021*.

The proposed development is justified and capable of approval subject to appropriate mitigation measures and conditions of consent, for the following reasons:

- it contributes directly to the National Housing Accord 2022 housing supply targets with the delivery of 180 new homes;
- it aligns with NSW Government transport-oriented development and centre-based growth objectives;
- it delivers a substantial and deliverable affordable housing outcome with the allocation of 39 new affordable homes;
- it generates significant employment outcomes, including approximately 308 jobs during construction and 135 ongoing operational jobs, supporting local economic activity and centre vitality;
- it represents orderly and economic development of land within an established centre; and
- it achieves a clear net public benefit.

When assessed as a whole, the proposal represents a superior planning outcome to the approved development, delivering substantially greater public benefit with manageable and acceptable impacts capable of being mitigated and regulated through the consent framework.