

SSD 41110128 – Submission

Approval of the proposed development is supported subject to conditions.

However, the SEAR's guidelines do not fully account for the impacts of the proposed development on an existing Seniors living facility. The residents of the property are old, many with limited mobility and chronic health conditions.

Residents live in multi-storey residential buildings and are somewhat reliant on the functioning of lifts for access and evacuation. They are seeking a safe and peaceful place to retire.

BUSHFIRE ASSESSMENT

The bushfire assessment provided in the EIS does not address the requirements of with NSW Bushfire Protection guidelines 2019 for existing structures with Special Fire Protection Purposes as outlined in Cl 8.2 & Cl 7.8.

To quote from Bushfire Assessment Report – BCBHS dated 2/12/25;

“No changes to the existing Stage 1 development are proposed”.

No technical justification or supporting analysis is provided for this conclusion beyond reference to an existing development consent. No contemporary assessment of compliance with the previous consent conditions has been provided.

The report also fails to address Section 8 of PBP 2019, which applies to existing development and identifies the site as containing three categories of Special Fire Protection Purpose (SFPP) buildings including;

- Seniors Living
- Multi-storey Residential
- Assembly Buildings

SFPP buildings of this nature require additional and explicit consideration under PBP 2019, Section 8.

Section 8.2 specifically calls up the need for compliance with Section 7 of the PBP 2019 and the necessity for “Better Bushfire Outcomes” (see Cl.7.8) for existing structures.

These mandatory requirements for existing structures and are not addressed in the BCBHS Bushfire Assessment report. The proposed Emergency Management Plan cannot hope to address the reduced passive fire protection present in the design of the existing buildings. It is possible that a more detailed assessment might identify cost benefits.

Recommendation; Any development approval should require that existing buildings be brought into compliance with “Special Fire Protection Purpose” requirements that apply to Seniors Living and Assembly buildings. It is noted that an indicative requirement of BAL 29 is nominated in Section 8 of the PBP for SFPP buildings.

TRAFFIC

To protect site distance for exiting vehicles and ensure the availability of acceleration and deceleration lanes no parking zones are required either side of the main vehicle entrance.

Recommendation: Any development approval should require establishment of no parking zones adjacent to the north bound traffic lanes. These zones should prevent vehicles parking within 75 metres of the main site access.

CONSTRUCTION NOISE

Consideration of construction noise impacts need to include provision for the elderly residents located in proximity to the construction zone.

The following extracts from the CEMP and EIS are contradictory in relation to proposed hours of work proposed on Saturdays.

Given the proposed four-year construction timetable work on Saturday should be limited to activities with a low noise impact on adjoining residents. Alternatively, the construction timetable should be limited to three years.

CEMP p10 - Hours of Work

- Monday to Friday 7:00am – 6:00pm;
- Saturday 8:00am – 1:00pm; and
- No work on Sundays or Public Holidays.

EIS p.69 - 3.9 Construction Management

The proposed hours of construction are as follows:

- Monday to Friday: 7:00am – 6:00pm
- Saturday: 8:00am – 4:00pm
- Sunday and Public Holidays: No construction work

Recommendation: That any approval issued require that construction work on Saturdays should be limited to activities with a low noise impact on adjoining residents. Alternatively, a three-year construction timetable should be mandated.