

DEVELOPMENT APPLICATION FOR PROPOSED MINGARA RECREATION CLUB SENIORS HOUSING, TUMBI UMBI

RESPONSE TO THE EXHIBITION BY THE GLENGARA VILLAGE RESIDENTS' COMMITTEE (GVRC)

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A. INTRODUCTION

The Environmental Impact Statement (EIS) attached to this application states that the application is for the provision of 219 x 2 and 3 bed independent living units (ILUs) and 39 high care beds across thirteen villa buildings of 2 storeys, three multi storey ILU buildings of 5-6 storeys and one mixed use building of 6 storeys with high care suites and ILUs. A total of 296 car parking spaces are proposed to be provided.

This report is made on behalf of the Glengara Village Residents' Association Inc. It analyses matters raised in the EIS and provides comments on those matters and recommendations to Planning NSW concerning the application. The two authors are jointly responsible for the drafting of this document. The contents of the document are endorsed by the GVRC.

Section B of this report clarifies the number of storeys proposed including the undercroft parking.

Development details: Application number SSD-63475709

Project name: Mingara Recreation Club

Location: 14 Mingara Drive, Tumby Umbi within the Central Coast Council

Applicant: The Trustee for Pariter Mingara Unit Trust

Total Estimated Development Cost: \$172,450,000

The development cost represents a net average cost of \$668,000 per dwelling.

B. DETAILS OF THE PROPOSAL

(a) FROM THE EIS

The proposed State Significant Development Application seeks approval to redevelop the site to accommodate a seniors' living development inclusive of the following:

- Site establishment works, including minor excavation, tree removal and earthworks.
- Construction and operation of: –

(a) Thirteen (13) villa buildings, housing four (4) independent living units in each

(b) Three (3) multi storey independent living unit (ILU) buildings in:

- Building 1 – undercroft car parking plus 5 levels (6 storeys) of 2-bed and 3-bed ILUs
- Building 3 - undercroft car parking plus 6 levels (7 storeys) of 2-bed and 3-bed ILUs
- Building 4 - undercroft car parking plus 5 levels (6 storeys) of 2-bed and 3-bed ILUs

(The term undercroft is used to describe a ground-level parking area that occupies the footprint of the building (and sometimes extends to other service or garden areas around the structure)).

(c) One (1) mixed high care and ILU building in Building 2 of - part undercroft car parking, part communal/amenities level at ground with 3 levels of high care suites and 3 levels of ILUs. This building will include communal facilities including a café, residential lounge, multifunction spaces, consultation/therapy rooms, library and staff/admin areas.

(d) Provision of 219 x 2-bed and 3-bed independent living units and 39 high care suites



Figure 1 - Layout of the buildings

The development will be carried out in two stages

Stage 1 works involve:

Construction of 119 Independent Living Units (ILUs) across three (3) buildings and six (6) villas, ranging in height from two to seven storeys. Buildings are sitting on top of their own undercroft carpark or community hub. A 39-unit high care facility is also proposed, covering 3 storeys within Building 2. This stage also includes construction of carparks in the area, providing 109 car parks within the undercroft parking within buildings and 48 parking spaces (on street parking and garage) for villas. This will also include construction of retaining wall within Building 3, a 216 cubic metre underground on-site detention tank in between Buildings 1 and 2, and a proposed 30kL rainwater tank. Site preparation, roadworks, civil and bulk earthworks, hard and soft landscaping and associated services and infrastructure will be conducted as well.

Stage 2 works involve:

Construction of 100 ILUs across one (1) building and seven (7) villas ranging from 2 storeys to 6 storeys in which the building will sit on top of its own undercroft carpark. This stage includes construction of 80 car parks within the undercroft parking within Building 4 and 56 car spaces, on street or garage, for villas. This will also include construction of retaining wall within Building 4, a 198 cubic metre underground on-site detention tank within the landscape area adjacent to Building 4, and a proposed 30kL rainwater tank.

It needs to be noted that there is a separate, but concurrent, development application at Mingara for the construction of a centre based childcare facility which offers placement for 112 children (all daycare age groups), indoor and outdoor play areas and at grade car parking for a minimum of 46 vehicles. ("At grade" car parking means uncovered ground level parking). The development is adjacent to the existing bowling greens as shown in Figure 2 below. This application will have a cumulative impact on the issue of traffic and carparking that is discussed further in section H(b) 1 and 5.5 below.

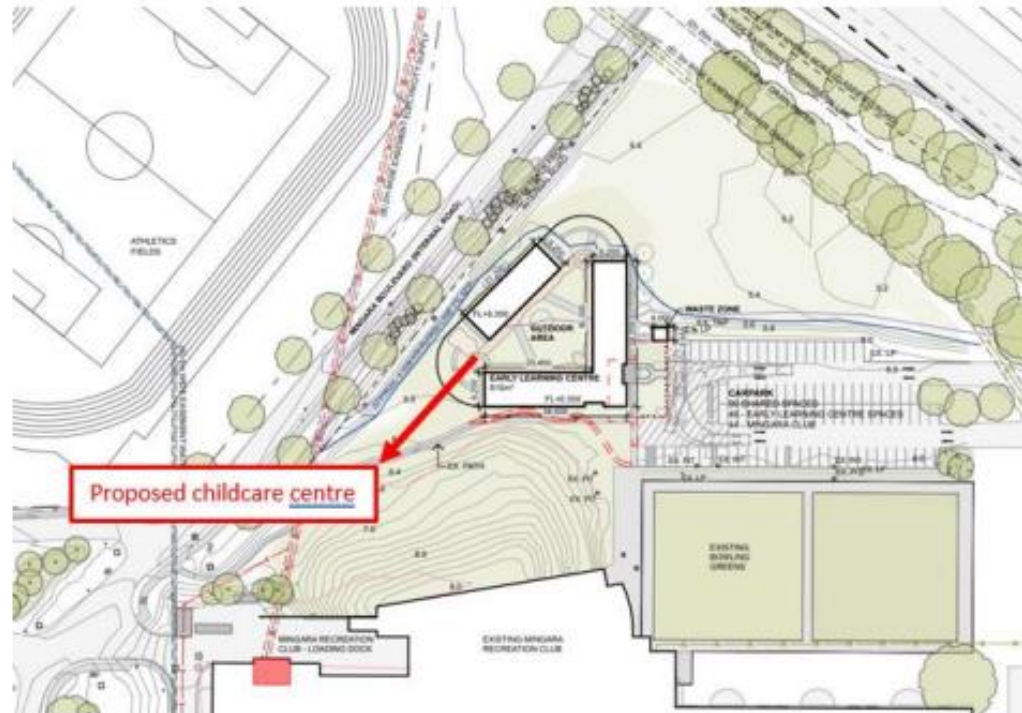


Figure 2 – Proposed Childcare Centre

(b) COMMENTS MADE BY GVRC

The committee is of the opinion that this application represents a significant over development of the site. Its scale and form are out of character with and not suitable for this suburban environment and flat landscape.

Figure 14 Tumbi Umbi Retirement Village – Axonometric View



Source: Marchese Partners

Figure 3 - Photographic representation of the proposed development

The local suburbs comprise low density, low rise residential development supported by local commercial and industrial sites, as well as Mingara Recreation Club which itself is mostly of two storeys (apart from the new hotel that is five storeys high including part undercroft parking).

The only locations in the northern section of the Central Coast Council area that involve anything like seven storeys are in the major commercial centres of The Entrance, Tuggerah, Toukley, Terrigal and Erina.

The adjacent Glengara Village site comprises 313 independent living units and 70 care apartments located on its large holding of 20.68 hectares. That development involves a dwelling density of 17.5 dwellings per hectare.

This development proposes 258 dwellings on this one small site of 2.9957ha, at a dwelling density of 86 dwellings per hectare.

GVRC acknowledges the need for additional accommodation generally to be provided on the Central Coast and for that accommodation to cater for an aging population. It believes that dwelling densities of the order of 86 dwellings per hectare are better suited to the more developed commercial centres near key transport infrastructure such as railway stations. That type of density is not suited to the nature of Tumbi Umbi and nearby suburbs.

Figure 16 Proposed ILU Apartments – Indicative CGI



Source: Marchese Partners

Figure 5 - Photographic representation of the buildings looking south with Building 2 on the left

C. LOCAL ZONING MATTERS

(a) FROM THE EIS

The Environmental Impact Statement advises that the proposal satisfies the applicable local and state development controls.

The proposal is permissible, with consent, and meets the relevant statutory requirements of the relevant environmental planning instruments, including

- State Environmental Planning Policy (SEPP) (Planning Systems) 2021
- State Environmental Planning Policy (Resilience and Hazards) 2021
- State Environmental Planning Policy (Transport and Infrastructure) 2021
- State Environmental Planning Policy (Biodiversity and Conservation) 2021
- State Environmental Planning Policy (Housing) 2021
- Central Coast Local Environmental Plan 2022

The Statutory compliance Table in the EIS documents states that “the proposal includes seniors housing which is diverse housing but does not deliver affordable housing”.

The NSW Government defines seniors housing as “housing designed to meet the needs of seniors and people with disability.

Seniors housing includes:

- (i) Residential care facilities – sometimes also known as nursing homes or aged care homes. Residents receive full-time care.
- (ii) Independent living units – apartments or villas for seniors and people with disability”.

The inclusion of seniors housing on site is responsive to key demographic shifts and trends on the Central Coast demonstrated below:



(b) COMMENTS MADE BY GVRC

GVRC acknowledges the growing ageing population in the local council area – see Figure 6 below.

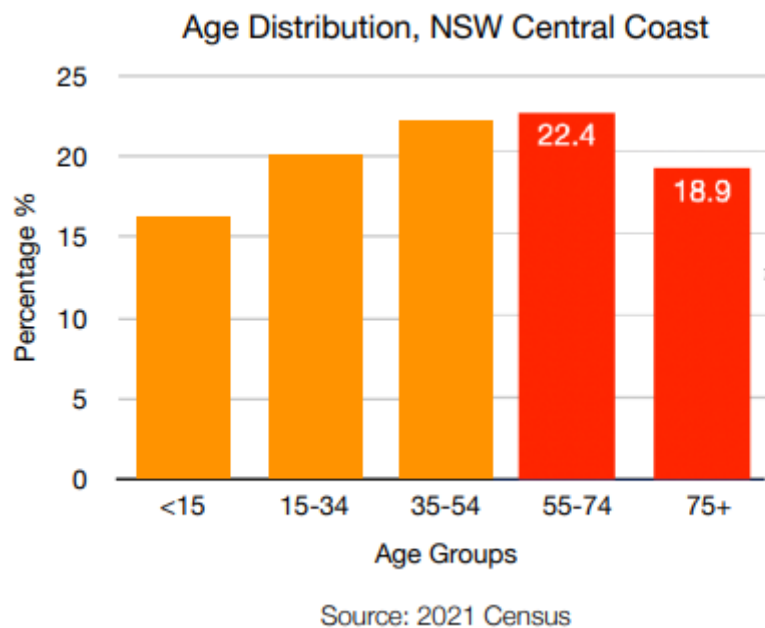


Figure 6 – Age distribution Central Coast

GVRC acknowledges that the proposal complies with local planning aims and does not object in principle to the proposal to develop seniors housing on this site.

As, mentioned in section B above, our objection is to the inappropriate size and scale of this particular proposal and the apparently, at times, subjective view in the EIS that there is no need for action to mitigate any adverse impact on the local community by way of noise, car parking, traffic management and protection of significant features of the landscape.

Those comments cause doubt on the independence and rigour of the EIS and its reports.

D. STORMWATER MANAGEMENT

(a) FROM THE EIS

According to the Integrated Stormwater Management Plan prepared by Stantec for the site, there are two (2) proposed underground on-site detention tanks and two (2) proposed rainwater tanks to be installed to accommodate stormwater flows within the proposed site. Additional junction and grated pits are strategically proposed within the site footprint to direct overland flow towards proposed detention basins and/or drainage infrastructure on site. The EIS assumes that the site will utilise the existing stormwater drainage infrastructure on Mingara Recreation Club to eventually direct flows to the existing constructed wetlands and eventually discharging into Tumby Umbi Creek.

(b) COMMENTS BY GVRC

GVRC notes that the Central Coast Local Environmental Plan 2022 identifies parts of the development area as sitting on a Flood Planning Area. The development site is located on the downstream end of Tumbi Umbi and is affected by flooding from Tumbi Umbi Creek.

Mingara is located on what was swampland, close to lake water level and so attention to flooding is a key issue.

It also notes that in the flood assessment prepared by Stantec, the proposed floor levels of the buildings demonstrate compliance with the Probable Maximum Flood (PMF) planning level. It states that the development site is free of flooding in the 1% Annual Exceedance Probability flood (AEP or commonly described as the 1 in a 100 year flood) and the PMF flood event (in the post development scenario) as a result of the increased flood storage to the south of the development.

GVRC notes the provisions proposed to manage stormwater drainage and to set floor levels free of the Probable Maximum Flood.

E. THE DRAINAGE EASEMENTS

(a) FROM THE EIS

The proposal seeks to revegetate the drainage easement/corridor to the west of the site and to manage it in accordance with a Vegetation Management Plan (VMP). The existing constructed drainage channel will be rehabilitated and re-vegetated in accordance with the VMP and a landscape plan. A publicly accessible pathway, to the west of the villas is also proposed.

(b) COMMENT BY GVRC

GVRC supports, in principle, the proposal to revegetate the drainage easements as shown in the overall plan in Figure 7 below.



Figure 7 – The overall plan to revegetate the drainage easement

It needs to be noted that there is an “unofficial” pedestrian crossing of the easement from Sandpiper Way to Mingara at present. The location of and the legal responsibility associated with that walkway, either in the easement or the detention ponds site, needs to be resolved and managed by Council.

It is interesting to note that the vegetation plan in Figure 7 happens to show the development site being used for parking by well over 100 vehicles, a fact that, in itself, partly contradicts statements made in the EIS in relation to the car parking spaces that would be displaced by the proposed development (see Section F below).

F. THE ATHLETICS FIELD AND DISPLACED CAR PARKING SPACES

(a) FROM THE EIS

The development site covers the existing grassed car park associated with the Athletics Field. Consideration of the replacement those parking spaces must be discussed. Currently the athletics field user groups utilise, at times, the existing development site as overflow car parking. Provision of appropriate car parking for all users in the Mingara Precinct is important to ensure there is no on street parking in residential areas as a result.

The approval for the Athletics Track, playing field and amenities, requires the provision of 150 “on grade” car spaces and 150 overflow spaces on the grassed area for the athletics field parking

It is important to note that the subject development site was not the only nominated grassed area that could be used for overflow carparking in DA420/98. The extract of an approved/stamped plan shows 100 grassed spaces on the subject development site but also shows 280 grassed spaces denoted to the north of the bowling green, adjacent to Wyong Road. The EIS states that the stipulated 150 grassed overflow car parking spaces can therefore be provided on this alternative land (adjacent to Wyong Road) and does not rely on the retirement village site.

(b) COMMENTS BY GVRC

GVRC believes that the EIS implies that the use of carparking associated with athletics events is not a significant issue. GVRC does not agree that the athletics field uses the overflow car parking area on this development site “at times”. It is used at every athletics function and regularly (including many school carnivals). The following two photos were taken by one of the authors and a Glengara Village resident at a December athletics event. The satellite image was found by a Glengara Village resident. They all show a typical parking situation for the athletics track events.

When the photos are studied, along with the information in the EIS documents themselves in Figure 7 above, it becomes clear that the provision of parking for the regional athletics track is a significant issue. To imply otherwise, as the EIS does, brings into question the integrity and rigour of the EIS (does the left hand know what the right hand is doing?)



Figure 8A - Photo taken by R Fulcher at 8.15am on 7/12/24 – cars were still coming in for an athletic event



Figure 8B – Photo taken by resident K Ryan at 1.08pm on 8/12/24



Figure 8C – An image from satellite mapping found by Glengara resident K Ryan

GVRC is confused by the logic here. Figure 8C clearly demonstrates that the Mingara Car Park does not have the capacity to provide parking for an athletics event. The approval for the athletics field required the provision of 300 car spaces. GVRC strongly believes that Council must be given the opportunity to comment on this car parking. Did Council agree that the athletics field, in which it has a commercial interest, would rely on Mingara car park for sealed parking spaces and on grass as “overflow” parking? This proposed development removes all of those currently on the development site. It proposes the provision of 150 spaces behind the bowling green.

GVRC accepts that there is a nominated grassed space for overflow parking between the club house and Wyong Road. The site is not linemarked to ensure the proposed 150 spaces can be provided by systematic parking. Its capacity to cope with traffic in wet weather is unknown. The access to the site is via an indirect route behind the pool to the bowling green and the vehicular access from the existing paved car park behind the bowling green to the grassed area is not properly graded. That overflow parking area needs to be well signposted and access points from the sealed car park need to be

improved. The applicant needs to explain how available spacing for 150 vehicles will be properly managed.

To suggest that the regional athletics field needs to rely on limited parking in the Mingara Car Park and “overflow” parking on a grass area in a location remote from the field does not do justice to the status of the Athletics Track and the expectations of its users.

GVRC believes that the applicant needs to clearly explain exactly how and where 300 car parking spaces for the Athletics Track will be provided and how that provision meets with Council’s conditions of approval for the track.

(G). BUILDING SETBACKS – OVERSHADOWING, VISUAL AMENITY AND NOISE

(a) FROM THE EIS

The EIS states that the development has substantial landscape setbacks to the western boundary and southern boundary. These setbacks will assist with mitigating shadow and visual impacts to and from the public domain and neighbouring developments at the southern and western side. The nearest neighbours to the proposed development are Glengara Village residents on the southern side of the development

The EIS states:

- The massing strategy presents an articulated building form with generous landscaped boundary setbacks of ~20m to the south and ~70m to the west.
- A Visual analysis has been prepared which concludes that view impacts to the public and private domain are reasonable and supportable on visual impact grounds. The potential for significant and/or unacceptable visual change has been sufficiently mitigated by the urban context, including the vegetation buffer to the south and west and moderate trees along Wyong Road and other streetscape elements.
- Landscaping and tree planting within each setback zone will soften the perceived bulk of the proposed development when observed from the public domain.
- Having regard to the site’s future context, the proposal will not result in any significant adverse impacts to nearby residential properties, including visual, overshadowing or privacy impacts.
- The proposal exhibits contemporary attributes that are visually coherent with surrounding buildings.

The EIS presents overshadowing diagrams (see below) that indicate that the Glengara Village residents will not be affected by significant overshadowing. It claims that the development ensures the proposed communal open spaces located within the Tumbi Umbi Retirement Village, to the north and south benefit from a high degree of solar access to ensure maximum enjoyment and useability. It states that the development

does not result in any reduction in solar access within neighbouring buildings below the two hours recommended under the planning controls.

Figure 26 Extract of Shadow Diagrams on June 21st (Winter Solstice)

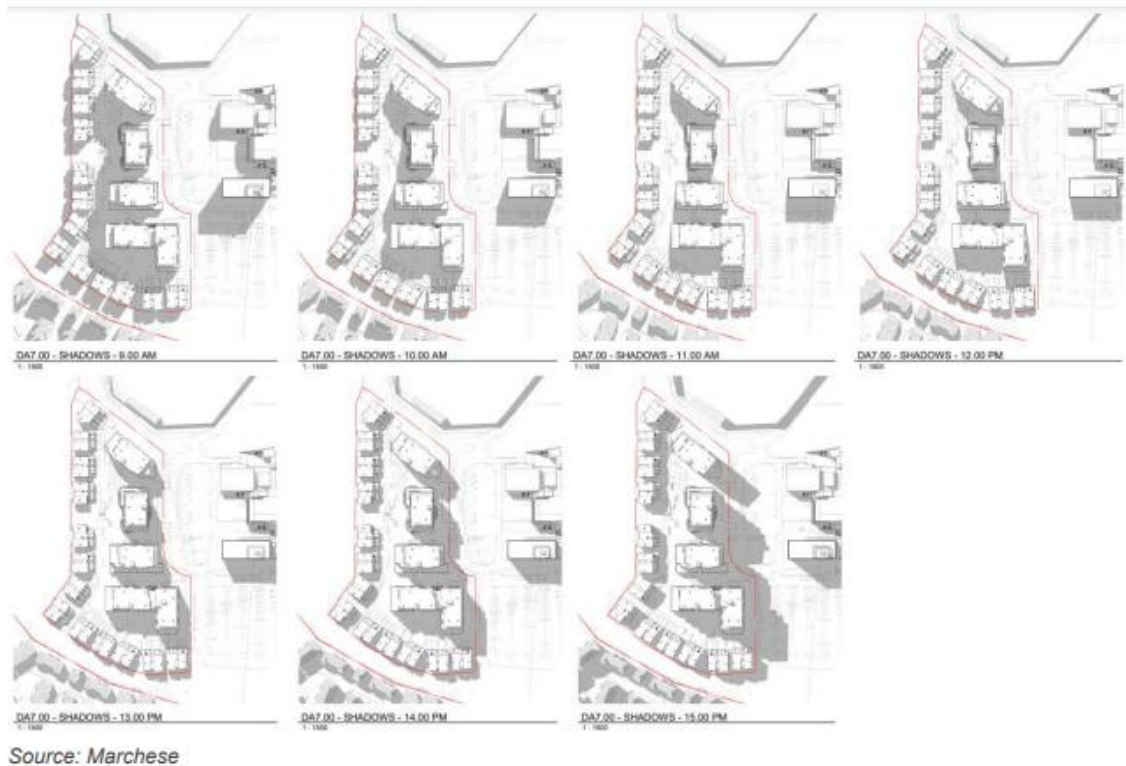


Figure 9 - Extract of Shadow Diagrams on June 21st (Winter Solstice)

The EIS includes the following subjective comments:

The EIS “identifies the noise-generating activities during operation to include external mechanical and plant systems (including kitchen exhaust fans from the café, bathroom exhaust fans and air conditioning units) and for vehicle assessment purposes based on the Transport and Accessibility Impact Assessment produced by the traffic consultant, Traffix. The vehicle assumptions have also been informed by operational details provided by the proposed architect’s, Pariter, experience. The Noise and Vibration Impact Assessment (NVIA) does not provide a detailed assessment of operational noise at this stage, however given the development includes similar, compatible land-uses to surrounding development (independent seniors living), and a use that is typically low noise generating, it is unlikely the proposal will have noise impacts on surrounding residents and other receivers.”

That comment is bewildering to the experience of people who have lived in or near high density accommodation in the past and questions the independence and objectivity of the EIS.

(b) COMMENTS BY GVRC

GVRC is pleased to note the proposed building setback of 20m to the southern boundary (the proposed development's closest neighbours). It does recognise that the Glengara Village residents at this boundary do already experience noise and light pollution from the existing Club, Hotel and Athletics and that they could not reasonably expect the current grassed area of the development site to remain so forever.

It does not agree with the apparently subjective statement in the EIS that the development "will not result in any significant adverse impacts to nearby residential properties, including visual, overshadowing or privacy impacts." It believes that that statement is an affront to the neighbours and it brings into question the independence of the EIS. The near presence of 258 new dwellings (with a population of the order of 350 people) must have an impact on these matters. This matter is also related to the view of GVRC that the proposed development is an over development of the site. These claims need a review by an independent expert planning consultant.

GVRC proposes that the conditions of any consent should require the developer to develop a vegetation plan for the 20m setback from the Glengara Village boundary to the south of the development, in close and meaningful consultation with those Glengara residents, to mitigate the effect of noise, light and visual impact on them resulting from the development.

GVRC does not agree with the claim that a visual analysis concludes that view impacts to and from the public and private domain are reasonable and supportable on visual impact grounds.

GVRC argues that the most significant visual element of the surrounding landscape in this generally flat terrain is the major ridge to the west of the site.

GVRC is of the opinion that the aesthetic value of a landscape is closely linked to its beauty and uniqueness. It believes that the aesthetic value attached to a place is always subjective and that people are drawn to places for many reasons. It argues that the ridge surrounding the Tumbi Umbi area is indeed a beautiful and unique site.

The photograph in Figure 10, taken by one of the authors, is from the existing Mingara car park, looking west and shows the beauty of the wooded ridge. It is the only ground level view of the ridge from what is seen to be a public domain.

That claim for the beauty and uniqueness of the ridge is supported by the photo in Figure 11, taken by a drone operated by a Glengara Village resident, T Collings.



Figure 10 - Photo taken by author on 17/12/2024



Figure 11 – View of the ridge circling the west and south of the development site, looking south west – taken by drone by T Collings

GVRC is of the opinion that the encircling wooded ridge contrasts beautifully with the flat ancient flood bed terrain of Tumbi Umbi. The proposed development gifts the traditional Tumbi Umbi view of that ridge line permanently and exclusively to a small number of proposed residents on the western side of the development. The EIS ignores or trivialises this matter of significance for the majority of people.

The views to the ridgeline from the broader Club precinct are considered important and should result in a built form that is responsive to maintaining view lines by breaking up the built form and limiting building heights. The following photographic representation from the EIS, in Figure 12, clearly shows a significant blockage of views of the ridgeline when looking from Wyong Road. That impact will be much worse when looking from the public domain of the Mingara Car park



Picture 15 V3. Southwest view from Wyong Road

Figure 12 – Impact on the view of the ridgeline from Wyong Road post development

The following Figure 13, again from the EIS, shows a significant blockage of view of the ridge when looking west from Mingara Medical. Any observer can imagine the more severe blockage of the view from the public domain of the Mingara carpark.

GVRC is at a loss to explain why the visual impact consultant chose not to present such an image for the EIS. The integrity of the EIS is brought into question again by such an oversight.



Figure 13 – blockage of views of the ridge from Mingara Medical

GVRC has stated earlier in this report that it considers the proposal to be an overdevelopment of the site. Reducing the height of all of the proposed buildings would reduce the adverse visual impact on views of the ridge as well as noise and traffic (see next section H).

GVRC is of the opinion that the developer cannot rely on the fact that the hotel building is already a five storey structure to argue precedence for the seniors living proposal.

GVRC believes that an independent visual impact and landscape consultant should be engaged to report on the value of the views of the ridgeline and the loss thereof by the proposed development, together with a mitigation proposal suggesting an appropriate maximum building height and building location.

(H) VEHICULAR ACCESS AND TRAFFIC MATTERS

(a) FROM THE EIS

The EIS notes that:

SEPP (Transport and Infrastructure) 2021 Schedule 3 of the SEPP (Transport and Infrastructure) 2021 identifies traffic generating development that must be referred to Transport for NSW ('TfNSW'). The site is adjoined by a classified road under the Roads Act 1993. Subject to the completion of the proposed development, the site will accommodate an additional 301 car parking spaces (comprising 293 ILU spaces, 3 Residential Care Facilities (RCF) spaces and 5 RCF staff spaces). As it is proposed to deliver more than 200 additional car parks at the site, this SSDA will need to be referred to TfNSW as traffic generating development.

The EIS states that traffic models expect net increases to overall peak period trip generation. The combined generation of the residential (RCF and ILUs) and non-residential components are summarised as:

- +15 vehicle trips per hour during the AM peak period (+15 in, 0 out)
- +88 vehicle trips per hour during the PM peak period (+54 in, +34 out) ▪ +64 vehicle trips per hour during the weekend peak period (+32 in, +32 out)
- +698 vehicle trips per day (+349 in and +349 out)

The EIS claims that the proposed development will not necessitate any upgrades to local transport infrastructure.

The EIS states that when reviewing the above intersection analysis:

- Intersections in the vicinity of the site will continue to operate at existing levels of service, with the exception of the Wyong Road / Tumby Road / Watsons Avenue intersection. This intersection will increase in average delay (6.8 seconds) and reduces to a Level of Service (LOS) 'D' in the AM peak only. (See Figure 10 below to understand the Level of Service definitions)
- Other intersections experience small increases however are considered minor, and no concerns are raised in terms of intersection performance.
- Based on the above results, no infrastructure upgrades or signal timing adjustments are considered necessary.

- Intersections at Pindarri Avenue, Beckingham Road, Hansens Road and the site access points will continue to operate at LoS 'B' or better with moderate increases to intersection delays.
- The signalised intersections at Mingara Drive and Tumbi Road will operate at a LoS 'E/F'. Consideration by TfNSW and Council should be given to infrastructure improvements at these intersections prior to 2033.
- Regarding the proposed scheme, there are minor to moderate increases to traffic through these signalised intersections. In addition, the cumulative traffic growth represented by this scenario already takes into account future development of the subject site, as it does the region generally. On this basis, the 10-year growth scenario is not considered to be a relevant consideration for a subsequent development application.

To summarise the intersection analysis, the EIS states, in summary, that the proposed scheme does not have any adverse impacts to key intersections near the site, with all intersections maintaining their levels of services during the weekday and weekend peak periods. Based on the above results and discussions, no infrastructure upgrades, mitigating measures or signal timing adjustments are considered necessary to facilitate the proposed development.

Table 4.2
Level of service criteria for intersections

Level of Service	Average Delay per Vehicle (secs/veh)	Traffic Signals, Roundabout	Give Way & Stop Signs
A	< 14	Good operation	Good operation
B	15 to 28	Good with acceptable delays & spare capacity	Acceptable delays & spare capacity
C	29 to 42	Satisfactory	Satisfactory, but accident study required
D	43 to 56	Operating near capacity	Near capacity & accident study required
E	57 to 70	At capacity; at signals, incidents will cause excessive delays Roundabouts require other control mode	At capacity, requires other control mode

Figure 10 – Level of service definitions for intersections

(b) COMMENTS BY GVRC

GVRC is of the opinion that the most significant matter for consideration in this development application is that of car parking and traffic impact. It is surprised that the EIS states that “the proposed development will not necessitate any upgrades to local transport infrastructure”.

All residents of the Tumby Umbi area already experience frustratingly low levels of service at the signalised intersections in the area and along Wyong Road at busy times. The fact that the EIS concludes that no upgrades are necessitated by this development leads to question the independence of the EIS. The conclusions of the EIS in this regard must be challenged and reviewed independently, say by Transport for NSW.

The authors of this submission have significant and relevant traffic engineering experience and knowledge. Because of GVRC’s major reservations about the traffic conclusions of the matters raised in the EIS, the authors provide the following detailed review of the analysis of the EIS.

The GVRC is encouraged by the fact that the proposal will be referred to Transport for NSW and believes that Planning or NSW should ensure that the technical matters it has raised below are referred for review by Transport for NSW before any determination on the SSD is made.

(c) TECHNICAL REVIEW OF TRAFFIC MATTERS

1. Executive Summary of Technical Matters in the EIS

It is the authors’ belief that the traffic report prepared by TRAFFIX has not fully assessed the impact that the proposed development will have on the surrounding road network.

There is no evidence that the TRAFFIX report has modelled the effect of the traffic generated by the 46 car parking spaces as well as the pick-up and delivery traffic associated with the proposed concurrent but separate development to create a child care centre.

The traffic report has not undertaken alternate traffic signal phasing options at the critical signalised intersections of Wyong Road / Mingara Drive / Tumby Creek Road and Wyong Road / Tumby Road / Watson Ave. to see whether any changes can be made to improve the operation of the signals.

The report has used similar developments at Bonnell’s Bay, Wamberal and Kincumber to assess traffic generation rates. Given that Glengara Retirement Village with 313 Independent Living Units (ILU’s) and 70 Care Apartments with access from Hansens Road and Jaeger Road is adjacent to the proposed development, it is puzzling why the traffic generated from Glengara was not used to guide the assessment.

The EIS ignores the fact that Glengara Village currently uses Shearwater Drive to access the Mingara Car Park and the convenient route to Wyong Road to avoid the traffic lights at Wyong Road/Mingara Drive and Tumby Creek Road. It proposes no mitigation of this reduction in convenience. It appears to ignore the fact that access to and from the development is either through the existing Mingara Carpark or the access road by the athletics track with no proposed analysis of the effect of resident and servicing traffic on the amenity of those routes.

The statement that the proposed development will have a minor impact on the surrounding road network and that no mitigation works are required is not supported.

2. Council requirements.

Central Coast Council's main concerns about the development relate to the loss of parking for the existing sports stadium as well as the use of the existing Mingara car park to access the development. Council also disagrees with the traffic report in that it will have nil impacts on traffic coming into and leaving the site.

Council's concerns match those of GVRCA

3. Key intersections.

3.1. Wyong Road and Pindarri Ave.

'U' Turn movements are allowed at this roundabout and should be stated in the traffic report.

3.2 Wyong Road and Beckingham Road.

'U' Turn movements are also allowed at this intersection and it is likely that some traffic from the proposed development will use this roundabout to travel east in lieu of the signalised intersection of Wyong Road and Mingara Drive.

3.3 Mingara Drive, Hansens Road and access to Mingara.

This roundabout also provides access into the Mingara Medical Centre and should be included in the traffic assessment.

4. Intersection volumes.

4.1 Peak Hour Volumes

According to the traffic report, traffic counts were undertaken on Thursday 30 November 2023 and Saturday 2 December 2023. These counts are over 12 months old and more recent counts should be undertaken.

4.2. Daily Volumes

TRAFFIX states that there are no recent TfNSW traffic volume counts available and therefore they have estimated the Average Annual Daily Traffic (AADT) based on 8 to 10% of peak hour volumes.

More accurate volumes could be obtained with the installation of traffic counters on all approaches to the key intersections.

5. Parking requirements.

5.1.Independent Living Units.

The EIS states that a total of 293 car parking spaces are to be provided which is 28 spaces in excess of what is required under SEPP part 5 division 7. A comparison with parking spaces provided at Glengara for 313 villas would be considered appropriate to determine the amount of parking that should be provided.

5.2. Residential Care Units

While the carparking (5 spaces) for employees complies with the SEPP, it assumes that 1 space is required for every 2 employees who are on duty at the same time. The number of spaces seems to be low compared with the reality at Glengara Village for such units. Further, this requirement does not take into account shift change over time. Nor does it consider whether every employee will drive independently to the site or the matter of parking for servicing contractors.

5.3 Servicing.

According to the report , servicing of building 2 (39 care units plus 3 levels of ILU's) will be undertaken by a small rigid vehicle with a bay length of 6.4m. It is highly likely that the site will be serviced by vehicles larger than a small rigid vehicle (Glengara Care units have large rigid vehicles servicing the site) and therefore its size should be increased to accommodate large rigid vehicles.

The EIS documents state that Council's waste collection vehicles (heavy rigid) will enter the site by the main entry. GVRC is of the opinion that all buildings, including free standing villas, are able to be serviced by large rigid vehicles.

5.4. Ambulance.

A separate ambulance bay needs to be provided and it should not be a shared facility.

5.5. Athletic Track Parking

As mentioned above in Section F, GVRC Believes that this matter of high importance that requires proper attention and resolution

The EIS contains the following table.

Athletics car parking

The proposal will displace an area used for overflow Athletics track car parking of 150 spaces. As such an analysis of the whole precinct's parking requirements at the worst case cumulative peak of 6pm-7pm (viewed as conservative) was undertaken and is summarised as follows:

Land use	Parking location	Parking demand	Spaces provided
Existing club	Club car park	359	791
Approved hotel	Club car park and hotel	92	11
Proposed child care	Club car park - north	27	-20
Existing athletics track	Club car park	300	0
		778	782

The photographic evidence from Figure 8C appears to contradict the claims in the EIS, from the above table, concerning the capacity of Mingara to cater for athletics track car parking.

As mentioned in Section F above, according to the traffic report the existing Mingara Car Park can cater for the relocated car parking (300 spaces) without the need to provide additional parking. The report does not mention whether any specific areas will be set aside for when parking is required for athletic carnivals. This needs to be clarified as well as defining pedestrian pathways from the car park to the athletic field.

The proposal to provide overflow parking on an uncontrolled grass field does not do justice to the patrons of the regional athletics track.

GVRC would like to see a clear plan to meet the traffic needs of the Club, hotel, child care centre and the separate athletics field that should have as much dedicated sealed hard standing car parking as possible.

6. Traffic and transport impacts.

6.1. Independent Living Units.

TRAFFIX has adopted an average of traffic generation from three sites at Bonnell's Bay, Wamberal and Kincumber to determine the traffic generation from the proposed ILU's. No information is given about these sites (the number of units, on site parking, servicing etc) and therefore the traffic generated from these sites cannot be accurately verified.

It would be more appropriate if traffic generation from Glengara (313 ILUs) was used.

In their assessment of traffic generation from the sites used, they state that there were no vehicle trips in the AM peak. Such a claim seems preposterous (no one goes out in the AM peak?). It is not the case with Glengara residents nor would GVRC suspect it would be the case with the proposed development.

6.2 Residential Care Units.

It is considered that actual traffic generation rates from the 70 Glengara Care Apartments should be used for accuracy.

6.3 Traffic Distribution.

An assumption has been made that 70% of ILU residents will arrive and depart to the north with 30% to the east. The authors believe a 40/60 split would be a more accurate assumption given that the nearest significant shopping centre is at Bateau Bay and Killarney Vale is popular for convenience shopping.

Figures 17, 18 & 19 on pages 43 & 44 do not show potential U turns at Wyong Road and Beckingham Road.

6.4 Modelling Scenarios SIDRA Analysis.

TRAFFIX has used SIDRA to model intersection operations under base case, base case with development and base case with development and 10 year growth.

No mention has been made whether alternate phasing of the signalised intersections of Wyong Road/Tumbi Creek Rd/Mingara Dr and Wyong Rd/Tumbi Rd/Watsons Ave has been modelled to determine whether intersection performance could be improved.

Given the short lane lengths on the southern approach (Mingara Drive) at the signalised intersection of Wyong Road, Mingara Drive and Tumbi Creek Road, the authors believe that Split Approach phasing should be looked at to improve efficiency. At present the through and left turn movements are regularly affected by the length of approach lanes and the short time allocated to the through movement. Through minor road works including kerb adjustments on the south western corner of the intersection, it may be possible to provide one left turn lane with an adjacent left and through lane.

6.5 Base Case and base case plus Development.

It can be seen from the traffic report that both tables (6 & 7) indicate that, during the PM peak, both signalised intersections operate at Level of Service (LoS) D. TRAFFIX considers the increase in traffic minor and does not propose to provide any additional works to mitigate the increase in traffic.

6.6 Base Case plus Development plus Background Growth.

Table 9 of the Traffic Report of the EIS shows that both intersections in the PM peak operate at LoS F which indicates that the intersections are operating above capacity and additional works need to be undertaken to address the situation. The EIS believes that any improvements are the responsibility of TfNSW and not the proposed development. GVRC believes that the proposed development should contribute to any works identified to improve intersection improvements through an appropriate Section 94 contribution.

6.7 Development Person Trip Generation.

TRAFFIX has used the previous mentioned sites at Bonnell's Bay, Wamberal and Kincumber to assess daily person trips to arrive at the proposed 219 ILU's generating 810 person trips per day.

It is considered more appropriate if surveys were conducted at Glengara (313 ILU's) which is adjacent to the proposed development to determine a more accurate assessment.

6.8 Signalised Intersection Design Analysis SIDRA) Outputs

While the traffic report states that the existing signalised intersection at Wyong Road, Tumby Creek Road and Mingara Drive operates in all peaks at a satisfactory level of service, the SIDRA outputs under all scenarios show that the southern approach (Mingara Drive) operate at LoS E & F during the AM peak (base level). Similar levels of service occur in the PM and Saturday Peaks with and without development traffic. When also applying 10 year background growth the intersection operates at LoS F. GVRC believes that these are not a satisfactory level of service.

(d) CONCLUSION.

The above comments show that the work in the Traffic Study and all of the matters detailed in Section H of this report need to be questioned and reviewed independently, preferably by Transport for NSW, to provide an accurate assessment of the impact of the proposal on Traffic and Parking before any determination is made on the development application

I. SUMMARY OF CONCLUSIONS

1. GVRC is of the opinion that the development in its current form should not be approved for the reasons provided in this report.
2. GVRC requests Planning NSW and Transport for NSW to closely review and evaluate the opportunities to modify the proposal and to implement mitigation measures that could reduce the adverse impacts identified in this report so that the development will be more compatible with the local environment and warrant approval.
3. GVRC specifically identifies the following matters, that have been detailed in the body of this report that it requests be the subject of the proposed review mentioned in Item 2 above and /or further clarification from the applicant:
 - (a) The cumulative impact of the separate application at Mingara for a child-care centre on traffic and car parking
 - (b) The opinion that the proposal represents an over development of the site and needs to be reduced in size, height and dwelling density
 - (c) The opinion of Council that “the proposal “is more akin to a town centre” and that a contextual analysis is required as to why the proposal is appropriate in this surrounding area and site”.
 - (d) The current use of an “unofficial” pedestrian crossing of the easement from Sandpiper Way to Mingara at present. The location of and the legal responsibility associated with that walkway, either in the easement or the detention ponds site, needs to be resolved and managed by Council.
 - (e) Clear and transparent resolution of the various issues raised concerning the replacement of the car parking spaces for the athletics field that are lost by this development, including specific advice from Council on the details of the original approval of the field and its acceptability of the current proposal for car parking for the field (noting that it has a financial interest in the field).
 - (f) Proposals to mitigate adverse effects of noise, overshadowing, privacy and visual impacts
 - (g) The apparently subjective statement in the EIS that the development “will not result in any significant adverse impacts to nearby residential properties, including visual, overshadowing or privacy impacts.” It believes that that statement is an affront to the site’s neighbours and it brings into question the independence of the EIS. These claims need a review by an independent expert planning consultant.
 - (h) GVRC believes that an independent visual impact and landscape consultant should be engaged to report on the value of the views of the ridgeline and the loss thereof by the proposed development, together with a mitigation proposal suggesting an appropriate maximum building height and building layout

- (i) Close consideration of all of the traffic matters identified in the technical review of traffic and parking matters, in Section H of this report, including an assessment of all of those traffic matters to be carried out by Transport NSW and Central Coast Council, who, after all, will be the parties who will need to manage potential future problems if they are not resolved by conditions of any consent to this development application

Please note that the authors are happy to discuss this report with officers of Planning NSW, Transport for NSW and Central Coast Council if considered appropriate.