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**Contact:** Tahlia Alexander

**Ref:** SSD-78493518

28 May 2025

Department of Planning Housing and Infrastructure  
Locked Bag 5022  
PARRAMATTA NSW 2124

Via: NSW Major Projects portal

**Attention:** Adela Murimba

Dear Madam,

**RE: SUBMISSION TO SSD-78493518 FOR RESIDENTIAL FLAT BUILDING WITH INFILL AFFORDABLE HOUSING AT 2-8 HIGHGATE ROAD, LINDFIELD**

Thank you for the opportunity to comment on the State Significant Development (SSD) application (SSD-78493518) for the proposed new residential flat building with infill affordable housing at 2-8 Highgate Road, Lindfield.

This submission should be considered as an **objection** to the proposal. The submission (**Attachment 1**) gives a detailed explanation of the reasons for Council's objection.

Council's key issues with the proposal include excessive height, bulk and scale; inadequate building setbacks; failure to maintain the landscape character of the locality; insufficient deep soil zones; and substandard residential amenity.

Council has very strong concerns regarding the bulk and scale of the proposed development and associated streetscape and residential amenity impacts as highlighted in this submission. Therefore, Council has engaged an Urban Design consultant to review the proposal. However, due to the recent influx of SSD applications lodged within the Ku-ring-gai LGA and associated resourcing pressures, the Urban Design consultant is still in the process of assessing the proposal. Council will send separate detailed urban design comments to the Department within the next 14 days.

It is noted that there is an SSD application currently under assessment on the adjoining site at 2-4 Woodside Avenue and 1-3 Reid Street (SSD-79261463).

Subject to satisfactory resolution of all of the issues raised in this submission, Council may withdraw its objection to the proposal.

Should you have any further enquiries, please contact Tahlia Alexander, Executive Assessment Officer, on 9424 0000 (Monday – Wednesday)

Yours sincerely,

Luke Donovan

**A/Team Leader Development Assessment**

## ATTACHMENT 1

### Ku-ring-gai Council's objection to SSD-78493518 at 2-8 Highgate Road, Lindfield

#### A. FLOOR SPACE RATIO & TOD ALTERNATIVE SCENARIO

The proposed floor space ratio (FSR) is calculated to be 3.25:1 which appears to comply with the maximum permitted FSR of 3.25:1 under the State Environmental Planning Policy (Housing) 2021 ("Housing SEPP"). However, it is noted that there is an error in the Applicant's gross floor area (GFA) calculations (discussed further below).

It is noted that seeking the maximum FSR is not an automatic right for any type of development, including affordable housing. The consent authority must consider other planning controls and impacts of the development in accordance with Section 4.15 of the *Environmental Planning and Assessment Act 1979*. It is not considered that the full permitted FSR can be achieved on the site whilst also complying with the ADG, providing a suitably scaled and articulated building, and providing sufficient deep soil and landscaping.

The proposed FSR is excessive and results in a significantly bulky building which is out of character with the desired future character of the area. The proposed FSR results in poor amenity for the future residents of the building, particularly in relation to solar access. Council is supportive of affordable housing, however it should be housing which is of a high standard of residential amenity. While a reduction in FSR would reduce yield, it would enable compliance with key ADG amenity controls and a building which better responds to the desired future character of the area.

In response to the NSW TOD planning policy, Council has developed a preferred scenario for four railway precincts at Gordon, Killara, Roseville and Lindfield. The exhibited preferred TOD scenario proposes the following height of building (HOB) and FSR development standards under the *Ku-ring-gai Council Local Environmental Plan 2015* (the subject site is outlined in red):

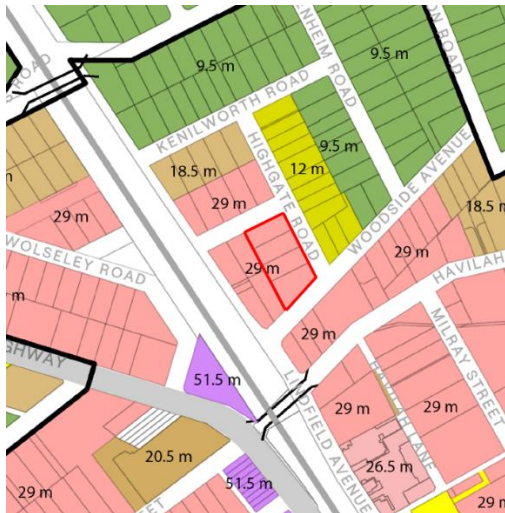


Figure 1: Council's proposed HOB map: 29m



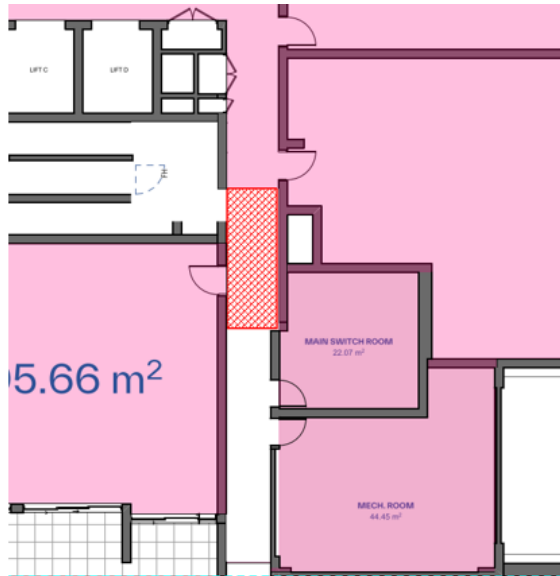
Figure 2: Council's proposed FSR map: 1.8:1

(Source: [Council Extraordinary Meeting Item GB.1, 22 May 2025](#))

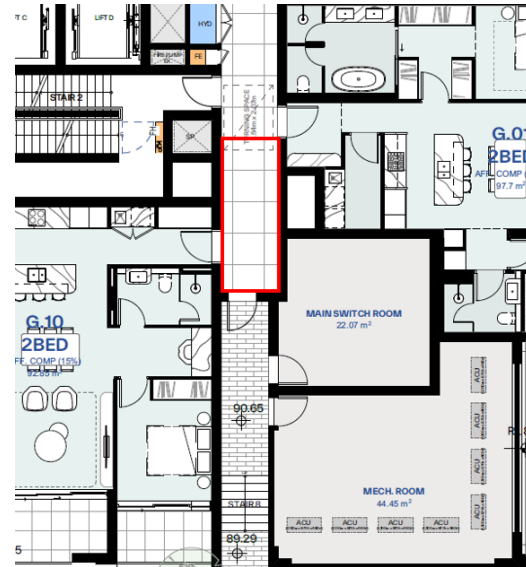
Council's proposed HOB and FSR KLEP amendments would provide for a development that is less bulky, provides an appropriate interface with the land to the north-east and allows for suitable landscaping. Council's proposed FSR would also enable a development on the site which provides a high level of residential amenity compared to the subject SSD proposal.

### **Error in GFA Calculations**

The Applicant has not included the entire corridor on the ground floor adjacent to the main switch room in the GFA, as indicated in red in the diagrams below:



**Figure 3: Applicant's GFA Calculations**



**Figure 4: Proposed Ground Floor Plan**

The consent authority needs to carefully review the Applicant's GFA calculations to ensure compliance with the maximum permitted FSR.

### **Affordable housing GFA Calculations**

Detailed GFA diagrams indicating a clear breakdown of the floor space attributed to both the affordable and market rate dwellings contained within the development has not been provided. The consent authority must ensure that the proposed FSR attributable to the affordable housing complies with the requirements of the Housing SEPP. This is critically important as the applicant seeks to rely on the maximum 15% affordable housing (and 30% uplift) under section 16 of the Housing SEPP.

## **B. BUILT FORM AND LOCAL CHARACTER**

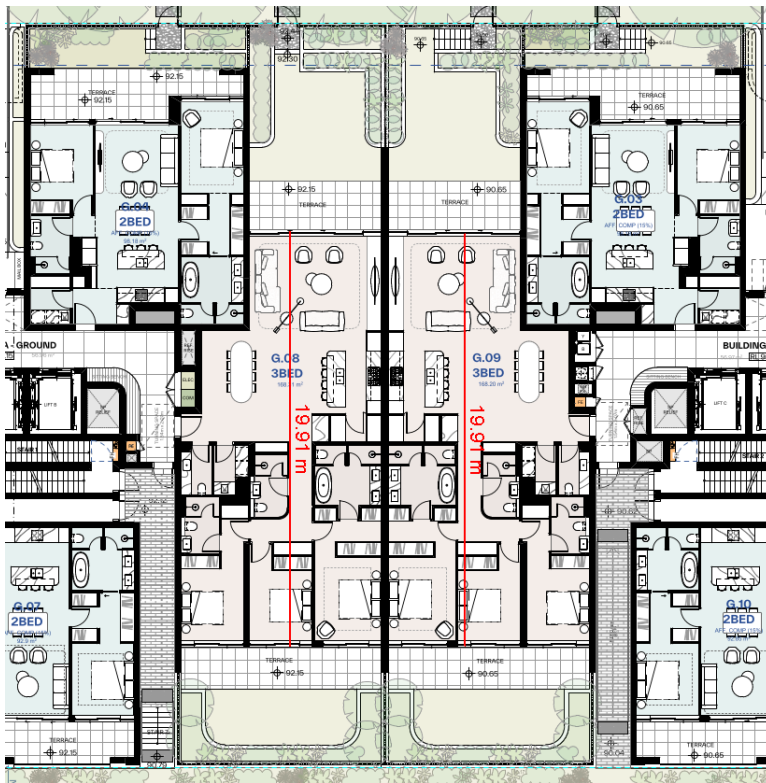
The proposed building is excessive in height, bulk and scale. The land on the opposite side of Highgate Road to the north-east is currently zoned R2 and contains 1-2 storey detached dwelling houses. The land on the opposite side of Highgate Road is proposed to be rezoned to R4 with a HOB control of 12m and an FSR of 0.85:1 (**Figure 1**) under Council's alternative TOD scenario.

The proposed building exceeds the maximum permitted height control by 1.7m and is approximately 75m in length along the Highgate Road frontage which is excessive.

The proposed building is only setback 6m from the Highgate Road frontage with only 4m of viable deep soil by virtue of the location of the basement level. Part 7A.3 of the Ku-ring Development Control Plan (KDCP) requires a minimum setback of 10m. A 10m setback would allow for generous landscaping including large trees to provide some screening of the proposed building.

The insufficient 6m setback, coupled with the proposed excessive height and building length, would result in an overbearing visual impact on the Highgate Road streetscape. The proposed building does not provide an appropriate built form transition with the lower density land to the north-east.

Furthermore, the design of the building results in the apartments in the middle of the building having a depth of approximately 19.91m which exceeds the maximum apartment depth of 12-18m recommended in Part 2E of the Apartment Design Guide:



**Figure 5: Centre apartments with non-compliant depth (repeated layout from ground level to Level 7)**

To reduce the bulk and scale of the development and improve the interface with Highgate Road, it is recommended that the proposal is amended in the following manner:

- Reduce the FSR to an amount which enables a fully ADG compliant development while ensuring a building with an acceptable bulk having regard to the predominantly lower density residential context. This could be achieved by providing two separated residential flat buildings on the site (above a consolidated basement) to provide a break in the building mass along Highgate Road while giving greater consideration to future amenity on the adjoining SSD development to the west of the site. This would also assist in improving solar access and natural cross ventilation (see discussion below).
- Provide a 10m setback from the Highgate Road frontage in accordance with Part 7A.3 of KDCP.
- Provide a minimum setback of 2.4m of the top storey from the outer face of the floors below on all sides in accordance with Part 7C.8 of KDCP.
- Reduce the building height to comply with the maximum permitted height.

## C. RESIDENTIAL AMENITY

### Solar access

Based on the recent influx of SSDAs for in-fill affordable housing within the LGA, it is reasonable to assume that the surrounding area will quickly develop under the Housing SEPP provisions and/or Council's alternative TOD scenario. The submitted solar access diagrams have been modelled based on the existing surrounding built form. The diagrams are therefore not an accurate representation of the level of solar access that would be received to the proposed apartments. It is strongly recommended that solar access diagrams are provided which include the adjoining proposed development at 1-3 Reid Street under SSD-79261463 and building envelopes which comply with the HOB and FSR proposed under Council's alternative TOD scenario.

Part 4A (3) of the ADG specifies that a maximum of 15% of apartments in a building receive direct sunlight between 9 am and 3 pm at mid-winter. According to the Applicant, the proposed development results in 16 (19%) of apartments receive no solar access to living spaces, which is non-compliant with the ADG. Given

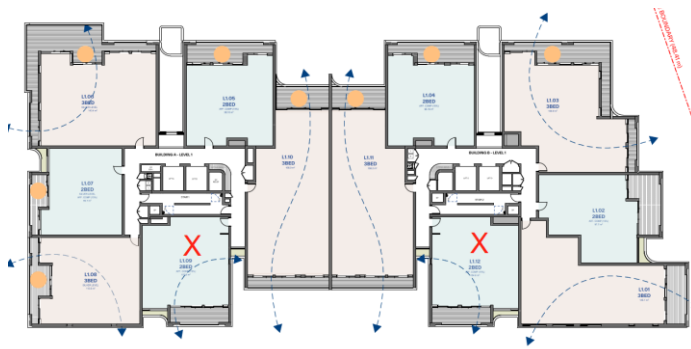


the solar diagrams are not a true representation of the level of solar access likely to be received, as detailed above, the number of apartments which will receive no solar access between 9am and 3pm is likely to be much higher once the surrounding area develops with higher density buildings.

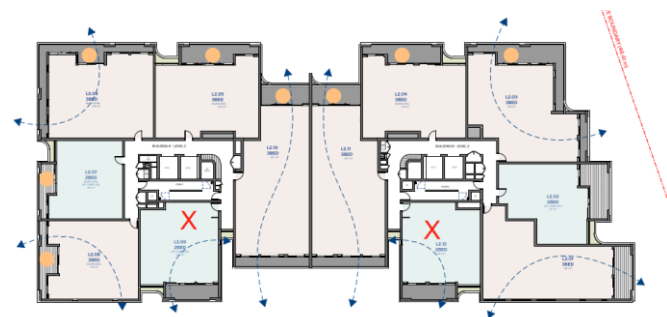
### **Natural Cross Ventilation**

Part 4B of the ADG requires at least 60% of all apartments to be naturally cross ventilated. According to the Applicant's calculations, 62% of the apartments are naturally cross ventilated. However, the Applicant's calculations are incorrect. Apartments that rely on a 'notch' or 'building indentation' cannot be considered as naturally cross ventilated in accordance with the ADG design guidance. 49 (58.2%) of the 84 total apartments are naturally cross ventilated which does not comply with the ADG.

The following apartments marked with a red cross on the Applicant's natural cross ventilation diagrams are not naturally cross ventilated:



Level 1



Levels 2-3

**Figure 6: Council's mark-up of Applicant's natural cross ventilation compliance diagrams.**

### **Affordable housing**

The apartments with the poorest amenity have been designated as affordable housing. For example, all 24 of the affordable housing apartments are not naturally cross ventilated. 19 apartments within the development receive no solar access as per the ADG and 13 of these apartments are designated as affordable housing. 13 of the 24 affordable housing apartments will receive no solar access and are not naturally cross ventilated. The consent authority should ensure that the amenity of the affordable units is not unfairly compromised.

### **Communal room**

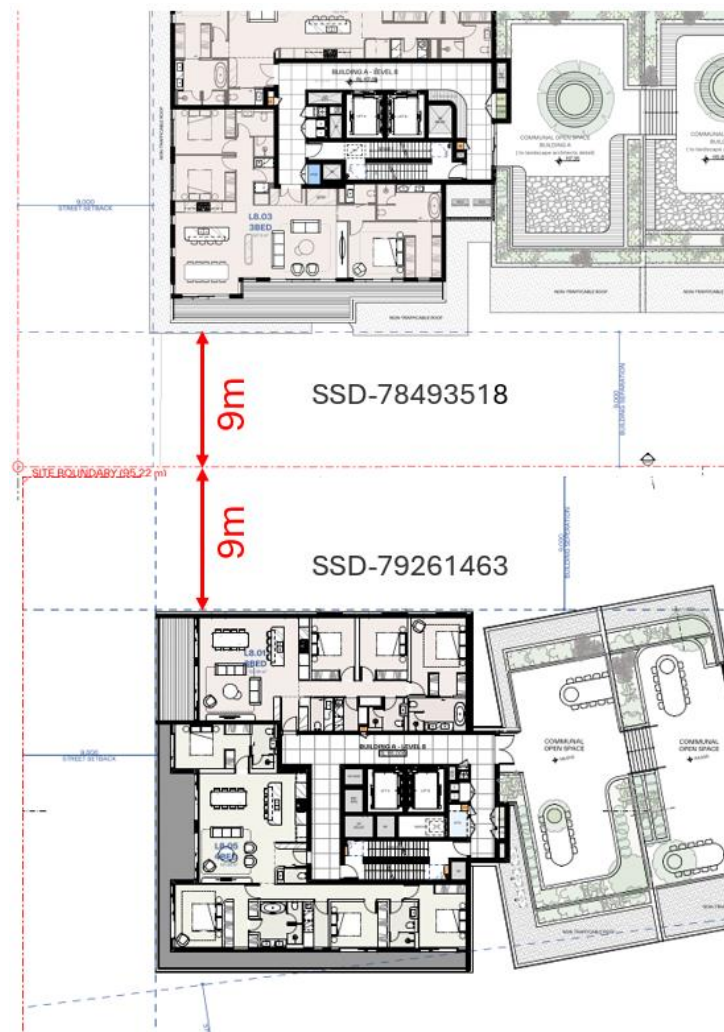
A community room is proposed to be located on the ground floor of 'Building A'. Whilst a community room is supported by Council, concern is raised with equitable access for all residents, particularly for mobility impaired residents and in times of inclement weather. For example, in order for a resident residing in 'Building B' to access the community room, they would be required to exit the building to the street, walk along the footpath and then enter the lobby of building A.

Another community room should be provided within 'Building B' or the design amended in such a way that allows for all residents to easily access the community room.

#### D. BUILDING SEPERATION

The top storey (9<sup>th</sup> storey) is required to be setback 12m from the south-west rear boundary in accordance with Part 3F of the ADG. The balcony to the top storey (apartment L8.03) is setback only marginally greater than the 9m from the rear boundary which does not comply with the ADG.

This is further exacerbated by the non-compliant 9m setback of the 9<sup>th</sup> storey proposed under the adjacent SSD application, as shown in **Figure 7**. A building separation of 24m at the 9<sup>th</sup> storey is required between the two buildings under Part 2F and Part 3F of the ADG. The two buildings are located only 18m apart which is a significant non-compliance.



**Figure 7: Proposed building separation at the 9<sup>th</sup> storey of the two buildings proposed under the subject SSD and the adjoining site (SSD-79261463)**

#### E. CLAUSE 4.6 – HEIGHT OF BUILDING

The proposed development seeks a variation to the maximum height of 28.6m permitted under Sections 18 (2) and 155(2) of the Housing SEPP. According to the Applicant, the proposed maximum building height is 30.3m which exceeds the height development standard by 1.7m (5.94% variation).

There are no specific objectives associated with building height in Division 1 of the Housing SEPP.

Consequently, the Clause 4.6 variation request addresses the consistency of the development against Chapter 5 of the Housing SEPP. Whilst this is commendable, the Clause 4.6 has failed to give any consideration to the objectives in Clause 4.3 in KLEP. The objectives in Clause 4.3 in KLEP deal directly with building height and should be considered in order to demonstrate whether strict compliance is “unreasonable and unnecessary” The variation request argues that compliance with the development standard is unreasonable and unnecessary for various reasons. Relevant extracts of the variation request are provided below:

- *The proposed development responds to site constraints, including the sloping topography, varying dimensions that narrow southward, three frontages, and surrounding developments. The design optimises the site while ensuring compatibility with the context, functional layout efficiency, effective stormwater management, and a positive streetscape interface*
- *As envisioned by Chapter 5 of the Housing SEPP and in satisfying the aim of the Housing SEPP, it is therefore submitted that the additional proposed height and the subsequent height variations enable reasonable and modest increased dwelling densities for the provision of additional high quality and accessible dwellings in proximity to public transport*
- *Provides appropriate building form, height, bulk and scale,*
- *Provides good landscape design*
- *Provides for very high levels of internal residential amenity*
- *Provides a design and external appearance that responds to both the existing and future development context, while presenting a high-quality interface to the public domain*
- *Further, and in addressing aim (b)(iii) which relates to amenity and liveability, the design of the development will provide for very high levels of internal amenity and liveability on the subject site, in that the proposed residential development will provide:*
  - *Very high levels of internal amenity, with internal solar access and cross-ventilation that exceeds minimum requirements as prescribed by the ADG*
- *In summary, despite the proposed building height variations, the aim of the Housing SEPP will be satisfied, as the proposal will result in the delivery of a residential flat building in proximity to heavy rail that is well designed, provides for appropriate height, bulk and scale that that will likely be consistent with future development character within the local area, and will provide for suitable amenity and liveability, both on and around the subject site.*

It is clear from the issues raised in this submission, that contrary to the argument advanced in the Clause 4.6 request, the proposal:

- is not of an appropriate height, bulk and scale;
- does provide an appropriate height transition to the lower density land to the north-east and therefore is not compatible with the desired streetscape character;
- does not provide a high level of amenity as it does not comply with the solar access and natural cross ventilation requirements of the ADG; and
- provides insufficient landscaping which is not in keeping with the landscaped character of the area.

Furthermore, part of the building which breaches the height of building standard does not comply with the required building separation setback specified in the ADG (as discussed above).

The environmental planning grounds, specifically “provision of additional housing density”, “lack of significant or unreasonable impacts on surrounding sites and the public domain” and the “provision of suitably size and designed housing” are not sufficient environmental planning grounds nor are they site specific grounds.

Given the above, the Applicant’s Clause 4.6 variation request is not considered to be well founded and does not provide sufficient environment planning grounds for the consent authority to support the variation.

## **F. LANDSCAPING AND TREE IMPACTS**

### **Inconsistency with SEARs**

Item 14 “Trees and Landscaping” of the SEARs states (emphasis added):

Ku-ring-gai Council Submission to SSD-78493518

*If the proposal involves impacts to trees, provide an Arboricultural Impact assessment that assesses the number, location, condition and significance of trees to be removed and retained including:*

- *any existing canopy coverage to be retained on-site.*
- ***tree root mapping. If the proposal involves significant impacts to tree protection zones of retained trees identified as being significant.***

The proposal includes impacts to publicly owned trees of high significance that contribute positively to the streetscape character and landscape context. The Arborist's Report fails to adequately assess tree impacts and is inconsistent with the requirements of the SEARS.

Tree 17 is a *Castanospermum australe* (Moreton Bay Chestnut) located within the Woodside Ave nature strip, in good health and condition (typical for the species) and of high significance with an A1 category rating (Important trees suitable for retention and worthy of being a material constraint, and trees that are already large and exceptional).

Tree 17 is impacted by the proposed driveway which is located immediately adjacent to the tree trunk and within the structural root zone. The tree has grown in association with an existing concrete driveway crossover at a greater setback. The project arborist has stated in part:

*Tree 17: This is an important tree on the verge with an existing gravel driveway surfacing near it. The proposed driveway will follow the same alignment as the existing driveway to minimise impacts to Tree 17.*

The proposed driveway does not follow the alignment of the existing concrete driveway and is located closer to the tree than existing. As per AS4970-2009 the project arborist has not provided adequate assessment of impact and has failed to provide development encroachment calculations within the TPZ and has failed to undertake any root mapping to enable assessment of impacts because of driveway excavation, which is inconsistent with SEARs item 14.

As Tree 17 is in good health and condition with high significance, its viable retention is required. Design amendments to the driveway access are required.

Further detailed arboricultural impact assessment, including root mapping and development encroachment calculations is required (refer to comments below under 'Landscape Design and Character')

### **Inconsistency with Design Principles of Housing SEPP**

Relevant landscaping provisions of the Housing SEPP are provided below:

#### ***Schedule 9: Design principles for residential apartment development***

##### ***5 Landscape***

- (1) Good design recognises that landscape and buildings operate together as an integrated and sustainable system, resulting in development with good amenity.*
- (2) A positive image and contextual fit of well-designed development is achieved by contributing to the landscape character of the streetscape and neighbourhood.*
- (3) Good landscape design enhances the development's environmental performance by retaining positive natural features that contribute to the following—*
  - a) the local context,*
  - b) co-ordinating water and soil management,*
  - c) solar access,*
  - d) micro-climate,*
  - e) tree canopy,*
  - f) habitat values,*
  - g) preserving green networks*
- (4) Good landscape design optimises the following—*
  - (a) usability,*
  - (b) privacy and opportunities for social interaction,*
  - (c) equitable access,*
  - (d) respect for neighbours' amenity.*



*(5) Good landscape design provides for practical establishment and long-term management.*

The proposal is inconsistent with the landscape design principles due to:

- The lack of tall tree plantings and deep soil landscape zone within two of the three street frontages fails to contribute to the established and desired landscape character of the streetscape (2 and 3a).
- The removal of trees 5 & 6 and impacts to tree 17 fails to retain existing natural features that form part of the local context and contributes to the existing tree canopy within the streetscape (3a & e).
- Insufficient detail regarding soil depth and volumes for on structure planters fails to provide for practical establishment and long-term management of the proposed landscape design outcomes (5).

## **Chapter 2 – Affordable Housing, Part 2, Division 1 Infill affordable housing**

*19(2) The following are non-discretionary development standards in relation to the residential development to which this division applies—*

- (b) a minimum landscaped area that is the lesser of—*
- (i) 35m<sup>2</sup> per dwelling, or*
  - (ii) 30% of the site area,*

**landscaped area** means the part of the site area not occupied by a building and includes a part used or intended to be used for a rainwater tank, swimming pool or open-air recreation facility, but does not include a part used or intended to be used for a driveway or parking area.

30% of site area equates to 1196sqm. The Applicant's landscape area calculations are inconsistent with the definition as the area of the building footprint has been included. It is recommended the Applicant's calculations and compliance plan be amended to provide clarity that the proposal is consistent with the requirements of the SEPP.

### **Apartment Design Guide**

#### **Part 3E - Deep soil zones**

Insufficient deep soil results in the loss of significant trees and a reduction in the landscape character and amenity and to the public domain. The site is considerably larger than 1500sqm at 3989sqm with several significant trees, a larger area of deep soil of minimum 15% (598sqm) should be provided to viably retain trees and provide for adequate landscaping to boundaries and street frontages to maintain the landscape character. The 15% deep soil zone is not achieved, and no deep soil zone as defined by the ADG is proposed within the three street frontages.

The 50% deep soil requirement of the KDCP is not achieved.

The lack of deep soil zone within the street frontages adversely impacts the ability of the development to provide tall trees to contribute to the public domain / streetscape and in context with the broader landscape character and to viably retain trees 5 and 6.

#### **Part 4O - Objective 4O-2 Landscape design contributes to the streetscape and amenity**

The adverse impact and possible loss of a significant tree within the Woodside Avenue nature strip (Tree 17) and trees of high amenity value to the Highgate Road frontage (trees 5 & 6) does not contribute to the streetscape and amenity and fails the ADG objective.

The landscape design proposal includes a high percentage of native species, which fails to recognise, maintain and enhance the established landscape character and cultural setting which is made up of primarily exotic evergreen and deciduous species beneath a taller endemic tree canopy. The use of non-endemic native trees such as River Red Gum is ill-advised as the species prefers a drier inland climate along riverbanks as opposed to the sites warm temperate climate, high rainfall and humid summers. Where native trees are proposed they should be endemic species.

#### **Part 4P - Planting on structures soil depths and soil volumes.**

Landscape Plans are insufficiently detailed to enable assessment of adequate soil depths and volumes consistent with the requirements of the ADG as no top of wall heights have been detailed. Refer to comments further below under "Landscape Design and Character".

#### **Tree removal, Replenishment and Impacts**

Deep soil zones and design layout of the basement does not retain significant trees and provide adequate clearance around trees in accordance with ADG and KDCP objectives to protect and enhance the value of trees. The following trees should be retained:

- a) **Tree 1:** *Franklinia axillaris* (Gordonia / Fried Egg tree) located within the western landscape setback. with an A1 category rating, worthy of being a material constraint. A mature specimen in good health and condition that contributes positively to the established urban context and landscape character. The trees' location immediately adjacent to the site boundary can enable its viable retention without amendments.
- b) **Tree 2:** *Lagerstroemia indica* (Crepe Myrtle) located within the western landscape setback. with an A1 category rating, worthy of being a material constraint. A mature specimen in good health and condition that contributes positively to the established urban context and landscape character. The trees' location immediately adjacent to the site boundary can enable its viable retention without amendments.
- c) **Tree 5:** *Arbutus unedo* (Irish Strawberry Tree) located adjacent to the Highgate Rd site frontage with an A1 category rating, worthy of being a material constraint. A mature specimen in good health and condition that contributes positively to the streetscape context and landscape character. The trees' location immediately adjacent to the site boundary can enable its viable retention with minor amendments
- d) **Tree 6:** *Franklinia axillaris* (Gordonia/Fried Egg Tree) located adjacent to the Highgate Rd site frontage with an A1 category rating, worthy of being a material constraint. The tree has been incorrectly located/plotted on the landscape plan. A mature specimen in good health and condition that contributes positively to the streetscape context and landscape character. The trees' location immediately adjacent to the site boundary can enable its viable retention with amendment to the location of the entry path.
- e) **Tree 17:** *Castanospermum australe* (Moreton Bay Chestnut) located within the Woodside Ave nature strip, of high landscape significance in good health and condition with an A1 category rating (worthy of being a material constraint). Tree 17 is impacted by the proposed driveway which is located immediately adjacent to the tree trunk and within the structural root zone where structural tree roots are located. The tree has grown in association with an existing concrete driveway crossover at a greater setback. To enable the viable retention of the tree the proposed driveway location needs to be reconsidered. There is design opportunity to realign and relocate the driveway further to the west to increase and maximise development setback from the tree.

There is design opportunity to enable the viable retention of trees: 1, 2, 5, 6, and 17 to improve amenity, maintain landscape character and to recognise the value of trees.

#### **Landscape Design and Character Inconsistency**

The landscape design fails to recognise the sites context and established landscape character which is contrary to the SEAR's, ADG and KDCP requirements:

- a) The proposed predominantly native planting palette fails to respond to the established landscape character and site context where the landscape palette is primarily made up of exotic evergreen and deciduous species beneath a tall tree canopy of endemic and ornamental tree species.

- b) The landscape plan fails to provide sufficient detail to ensure adequate soil depth has been provided in planters for the proposed planting and in accordance with ADG and KDCP. It therefore cannot be determined whether proposed planting is viable.
- c) The removal of trees 1, 2, 5, 6 and impacts to trees 17 is unacceptable. To maintain landscape character and site context for amenity and streetscape outcomes, these trees shall be viable retained.
- d) Native tree species where proposed should be endemic species to enhance local biodiversity and maintain local character. The planting of *Eucalyptus tereticornis* (River Red Gum) is inappropriate and shall be replaced with *Syncarpia glomulifera* (Turpentine), *Angophora costata* (Sydney Red Gum) or other locally occurring species.
- e) The use of artificial turf is uncharacteristic of the established landscape character. Artificial turf is known to absorb heat and be un-useable during hot summer days. There is opportunity to provide additional planters on podium for increased amenity and for increased paving for a more characteristic aesthetic.
- f) No equitable access for the ground level communal open space is provided for the northern units.
- g) No communal facilities or shade structures are provided for the communal rooftop terraces.

There is further landscape design opportunity for the landscape aesthetic to respond to the established landscape character.

### **BASIX Certificate**

Certificate 1789784M dated 01/04/2025 is submitted as part of the application. The certificate is inconsistent with the development proposal due to:

- The certificate fails to nominate areas of proposed private area of garden and lawn for units: G.08, G.09, L4.01, L4.02, L4.03, L4.04, L4.05, L4.07, L4.08, L5.02, L5.03, L5.04, L5.06, L6.03 and L6.05, which all have planters proposed which are only accessible from the unit and contribute to their private amenity. The planters do not fall under the BASIX common landscape definition and are therefore areas of private landscape.
- The certificate fails to nominate any common taps. Common taps are required for the irrigation of common landscape areas and for common elements such as the bin/waste rooms (health) and car wash bay.

The certificate does not reflect the proposed water usage for the development. An amended certificate consistent with the development is required.

## **G. ENGINEERING**

### **Geotechnical Investigation**

A geotechnical report based on boreholes drilled to below basement level is to be submitted with the SSD that will involve the drilling of deeper boreholes and the installation of groundwater monitoring wells. The report is to contain recommendations for excavation methods and support, vibration monitoring, dilapidation survey etc. Groundwater levels are to be recorded to determine if permanent dewatering will be required, in which case the SSD may require referral to NSW Office of Water for licensing conditions (Integrated). The report shall demonstrate how the proposal will achieve compliance with clause 6.1 'Earthworks' of the LEP and section 6.6(1)(g) of State Environmental Planning Policy (Biodiversity and Conservation) 2021.

## **H. ACOUSTIC REPORT**

The architectural plans submitted as part of the application (dated 28 March 2025) provide further detail on the proposed air conditioning condenser units, which were not fully specified in the acoustic assessment. According to the plans:

- 8 condenser units are proposed in the mechanical room on the ground floor;
- 25 condenser units are proposed on the roof of Building A;
- 28 condenser units are proposed on the roof of Building B.

This amounts to a total of 61 condenser units proposed for the development. However, the development proposes a total of 84 residential apartments. This indicates that the number of condenser units does not match the number of residential units proposed, suggesting either that multiple apartments may share condenser units or that some units may be designated for communal areas or services. This discrepancy, along with the acoustic report's reliance on general assumptions about plant selection and location, raises concerns about the accuracy and completeness of the assessment.

Given the above, it is requested that the applicant provide:

1. Clarification on the mechanical plant's design, including the relationship between the number of proposed condenser units and the total number of residential units, and confirmation of any shared condenser unit arrangements or communal servicing provisions.
2. Updated noise modelling and assessment, reflecting the actual number and locations of condenser units as shown in the architectural plans, including revised compliance assessments against the established noise criteria.
3. Confirmation that noise emissions from the final mechanical plant selection will comply with the criteria detailed in the acoustic report for all operational periods, supported by updated modelling if necessary.

Once this information has been provided and verified, further comments can be made regarding the adequacy of the proposed acoustic mitigation measures.

## **I. CONTAMINATION**

A Preliminary Site Investigation (PSI) report has been submitted the SSDA. Based on the findings of the PSI, Geotesta concludes that while the site may be made suitable for the proposed residential development, a Remedial Action Plan (RAP) is first required to be submitted to:

- Detail the extent and nature of identified contamination;
- Outline the proposed remediation methodology, validation procedures, and waste classification requirements; and
- Confirm the site's suitability for the proposed residential use following remediation.

The RAP should be submitted prior to consent being granted.

## **J. HEAT ISLAND EFFECTS**

The communal roof top area should include generous landscape gardens to reduce the heat island effects. This is an important long term environmental consideration given the expected rise in temperatures moving into the future.

## **K. AFFORDABLE HOUSING NEEDS**

Council acknowledges that housing in Lindfield is not affordable and population displacement and community retention is a challenge in the LGA. The provision of apartment housing stock in the area, particularly affordable housing, will contribute to addressing this issue. Affordable housing should support lower income-earning key workers that are needed in their local community, such as home support workers, rather than only moderate income earners. It was specifically noted that home support workers that undertake home visits are highly sought after in the local area by aged care providers funded to support ageing individuals who wish to age in place.

Council recommends that all affordable housing units within the development should be operated by a Community Housing Provider in perpetuity (beyond the 15-year minimum requirements) as the loss of affordable housing after 15 years will result in the displacement of that resident population raising the key issues of social isolation with people having to reestablish their social and support networks elsewhere. Loss of the resident population returns the issue of loss of local workforce and thus impacts on the local community reliant on those workers.

## **L. SOCIAL INFRASTRUCTURE AND SERVICES**

Council notes that there is a need for the provision of additional social infrastructure services to meet the demands of an increasing population resulting from high density residential developments such as the subject proposal. In particular, Council has identified the need to provide additional services and facilities including additional library spaces, cultural facilities, hireable community spaces, aquatic centres, indoor recreational spaces and open spaces to meet the demands of residents.

It is also important for the applicant and consent authority to identify the capacity of existing services such as pre-school and childcare places and address future demands as such services will be required to support young families that move into the development.

Council notes that over subscription of schools and hospitals and other social services have not been considered by the State Government for the expected cumulative development that will result from the increased housing reforms.