

Subject: Objection to Proposed Amendment to SSDA SSD-46561712 – BaptistCare Macquarie Park Masterplan

Dear Paulina,

I am writing to formally object to the amended Concept SSDA for the BaptistCare Macquarie Park Masterplan, located at 157 Balaclava Road, Macquarie Park.

While I acknowledge the intention to develop an integrated, intergenerational precinct, I submit that the proposal in its current form presents significant shortcomings, particularly in relation to environmental sustainability, urban heat resilience, and public amenity. Below, I outline my objections with supporting references drawn directly from the appendices submitted as part of the Environmental Impact Statement (EIS).

1. Failure to Adequately Protect Critically Endangered Ecological Communities

The Biodiversity Development Assessment Report (Appendix N) confirms the presence of **Sydney Turpentine-Ironbark Forest (STIF)**, a **Critically Endangered Ecological Community (CEEC)** under the NSW *Biodiversity Conservation Act 2016*.

“Vegetation within the subject land comprises... 0.08 hectares of PCT 3262... consistent with the threatened ecological community Sydney Turpentine-Ironbark Forest...” and “0.03 hectares... will be removed under the proposal” — *Appendix N, p.4–5*

While the proposal claims to avoid direct impacts, **even indirect or edge degradation effects are significant** for an ecological community with <10% of its original area remaining. Fragmented remnants like this are ecologically important, particularly in urban settings.

2. Insufficient Commitment to Urban Heat Mitigation

The proposal results in the **removal of nearly 1.6 hectares of vegetation**, including:

- 0.60 ha planted native vegetation
- 0.98 ha exotic vegetation

- Isolated canopy trees and remnant PCT 3262 vegetation

Despite this, there is **no assessment of urban heat island (UHI) impact**, thermal comfort, or summer climate risk to vulnerable groups (elderly residents, children). The mitigation response—a combination of **green roofs** and **tree replanting**—lacks detail and measurable performance indicators.

“Offsets are required for the removal of 0.03 ha... mitigation includes a CEMP” — *Appendix N, p.5*

Yet no surface temperature modelling, canopy shade audit, or thermal performance study has been provided.

3. Lack of Enforceable Water Management Framework

The design guidelines defer detailed **Kikkiya Creek management** to future applications:

“A Management Plan is to be prepared for Kikkiya Creek with a future development application.” — *Design Guidelines, Provision 7.10*

This deferral is inconsistent with **SEPP (Biodiversity and Conservation) 2021**, which requires:

- Neutral or beneficial effect on water quality
- Minimisation of stormwater impact
- Protection of aquatic ecology in regulated catchments (e.g. Port Jackson catchment)

Without a creek restoration plan now, the community has **no certainty on flood resilience, groundwater protection, or long-term water quality outcomes**.

4. Misuse of “Green Space” Claims and Lack of Tree Canopy Commitments

The proposal claims:

- “400+ new trees”
- “24.5% deep soil”
- “38% tree canopy coverage” — *Appendix T, p.2*

But fails to clarify:

- Canopy **maturity timelines** (can take 10–20 years)
- % of public space that is hardscaped vs shaded
- Summer microclimate targets or metrics

The term “open space” includes **parklets and urban plazas**, which do little to reduce ambient temperatures or provide shade. No thermal comfort modelling or design standards are attached.

5. Weak Integration of Crime Prevention at Masterplan Level

The CPTED Assessment defers detailed design to later stages:

“Building-specific CPTED principles will be carefully considered at further detailed DA stages” — *Appendix S, p.30*

This is inadequate. For a large mixed-use precinct, **baseline safety and passive surveillance measures must be integrated at the Concept stage**, not left to later approvals. The report also admits nearby hotspots for vehicle theft and property damage.

6. Traffic and Transport Impacts Not Fully Addressed

Although the plan includes internal road realignments, it does not address **regional traffic consequences**, especially:

- Peak hour congestion near **Epping Road**
- Lack of parking analysis for co-living and commercial uses
- No mode-share or trip generation data at this stage

Under **SEPP (Transport and Infrastructure) 2021**, the Department must assess:

- Cumulative transport impact
 - Road safety and access
 - Demand on nearby public infrastructure
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Conclusion

This SSDA amendment:

- Removes ecologically significant habitat with inadequate protection
- Lacks urban heat or thermal comfort planning
- Defers essential environmental and safety controls to later stages
- Provides insufficient guarantees on water and transport infrastructure

I request the Department reject the amendment until the proponent submits:

- Urban heat mitigation modelling
- Full Kikkiya Creek restoration plan
- Canopy cover targets with timeline and enforcement
- CPTED principles embedded at precinct layout level

Thank you for considering my objection.