

**Department of Climate Change, Energy, the Environment and Water**

Our ref: OUT24/1279

Elena Sliogeris  
Planning Group  
NSW Department of Planning, Housing and Infrastructure

Email: [elena.sliogeris@dpie.nsw.gov.au](mailto:elena.sliogeris@dpie.nsw.gov.au)

1/02/2024

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Subject: Sandon Point Concept Plan - Modification 6 (MP06\_0094 MOD 6)

Dear Ms Sliogeris,

I refer to your request for advice sent on 22 January 2024 to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

The proposed development is to modify the concept plan for Sandon Point.

DPE Water has reviewed the Modification Report and has recommendations regarding water supply, take and licensing. Please see Attachment A for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW Water Assessments [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au).

Yours sincerely



Rob Brownbill,  
Manager, Water Assessments, Knowledge Division  
Department of Climate Change, Energy, the Environment and Water

## Attachment A

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### Detailed advice to DPE Planning & Assessment regarding the Sandon Point Concept Plan - Modification 6 (MP06\_0094 MOD 6)

#### 1.0 Water supply, take and licensing

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##### 1.1 Recommendation – pre-determination

That the proponent quantifies the maximum annual volume of water take due to aquifer interference activities and demonstrates the ability to acquire sufficient water entitlement unless an exemption applies.

##### Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes. DCCEE Water notes that the groundwater table will likely be intercepted, particularly for the development of the basements. Maximum excavation depths for this project are unclear. An analysis of groundwater depths against the excavation depths has not been presented, it is therefore unclear if groundwater seepage into the excavation for the basements or otherwise is possible. The proponent has not presented sufficient information and analysis on inflows during the construction and ongoing operation of the site. Quantification of maximum potential inflow volumes is required.

##### 1.2 Recommendation – post approval

The proponent should ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the *Water Management (General) Regulation 2018*.

##### Explanation

Under the *Water Management Act 2000*, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the *Water Management (General) Regulation 2018* applies. An exemption may be available if water take is less than or equal to 3 ML per water year, subject to the development meeting other exemption requirements, such as:

- the water is not taken for consumption or supply;
- the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and
- the records are kept for 5 years.

Further information on these requirements and other information on licensing and approvals, exemptions, including an exemption application form and a form to report and record water taken can be found at:

<https://water.dpie.nsw.gov.au/licensing-and-trade>

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## 2.0 Groundwater impacts and dewatering requirements

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### 2.1 Recommendation – pre-determination

If the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). These documents are available at:

- [https://water.dpie.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf](https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0005/151772/NSW-Aquifer-Interference-Policy.pdf)
- [https://water.dpie.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf](https://water.dpie.nsw.gov.au/__data/assets/pdf_file/0007/171097/Aquifer-Interference-Assessment-Framework.pdf)

#### Explanation

As per Recommendation 1.1 above, the Modification Report has not provided a volumetric quantification of groundwater take. Additionally, the Modification Report has not provided an assessment of impacts to groundwater due to construction or operation of the project. DCCEEW Water notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.

## 3.0 Controlled Activities on Waterfront Land

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### 3.1 Recommendation – post approval

Works within waterfront land need to be undertaken in accordance with the Guidelines for Controlled Activities on Waterfront Land. This document is available at:

- [Guidelines for controlled activity approvals | Water \(nsw.gov.au\)](#)

#### Explanation

Works within waterfront land including crossings over Cooksons Creek and stormwater outlets should be designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land.

End Attachment A

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**From:** Nicola Roche <[nicola.roche@environment.nsw.gov.au](mailto:nicola.roche@environment.nsw.gov.au)>

**Sent:** Wednesday, 24 January 2024 7:06 PM

**To:** OEH Planning Matters Mailbox <[PlanningMatters@environment.nsw.gov.au](mailto:PlanningMatters@environment.nsw.gov.au)>

**Subject:** RE: Reminder notification\_ Notice of Exhibition - Sandon Point Concept Plan - Modification 6 (MP06\_0094 MOD 6)

Good afternoon,

Thank you for the opportunity to provide comment on the above matter. Heritage NSW has reviewed the 'Masterplan Amendment – MOD 6 Concept Plan Approval MP06\_0094 Anglicare Bulli, Sturdee Avenue, Bulli, Sandon Point NSW' prepared by Navin Officer Heritage Consultants Pty Ltd, dated 11 September 2023. Heritage NSW is aware that the area subject to MP06-0094 has been subject to prior Aboriginal cultural heritage assessments, including the completion of test excavation and reporting sufficient to inform prior approval. However, the letter provided does not contain sufficient detail to relate the location, extent and outcomes of prior assessment to the current modification. In order to provide advice on the adequacy of the assessment process, Heritage NSW requests that the letter be revised to provide further information including:

- Current mapping showing the location of the approved project footprint, identified Aboriginal archaeological sites, the Turpentine Forest and the proposed changes to the project footprint subject to the current modification;
- A summary of prior Aboriginal cultural heritage assessments and anthropological assessments undertaken within the MP06\_0094 area, including management recommendations relevant to the current modification;
- A summary of approved management requirements for Aboriginal sites and areas of sensitivity and clarification of any changes proposed under the current modification;
- A summary of prior consultation with the Registered Aboriginal Parties; and
- Evidence of updated consultation with the Registered Aboriginal Parties advising them of the proposed modification, providing them with a copy of the letter report containing all of the above information and providing them with the opportunity to comment on the proposed modification.

Without the above additions, the current document does not contain sufficient information for Heritage NSW to provide informed advice to the Department on the adequacy of the proposed management approach for the current modification.

Should you wish to discuss, please don't hesitate to contact me.

Regards

Nic

**Nicola Roche**

Principal Assessments Officer  
Heritage NSW

**Department of Climate Change,  
Energy, the Environment and Water**

**T** (02) 9228 6424 **M** 0400 133 251 **E** [nicola.roche@environment.nsw.gov.au](mailto:nicola.roche@environment.nsw.gov.au)

[dcceew.nsw.gov.au](http://dcceew.nsw.gov.au)

Locked Bag 5020 Parramatta 2124

**Working days** Monday to Friday, 9:00am – 5:00pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.



DOC23/1117636-3

19 January 2024

Elena Sliogeris  
Department of Planning, Housing and Infrastructure

Via email: [State.SignificantAcceleration@dpie.nsw.gov.au](mailto:State.SignificantAcceleration@dpie.nsw.gov.au)

## **Sandon Point Residential Development – Retirement Village Modification 6 No Comment on Modification Report**

Dear Ms Sliogeris,

I refer to your invitation to the NSW Environment Protection Authority (EPA) to provide comment on the Modification report for the proposed Sandon Point Retirement Village on behalf of Anglicare Residential at Geraghty Street Bulli NSW 2516.

Based on the information provided, the EPA has no regulatory role for this proposal and no further consultation is required. This is because:

- the proposal does not constitute a Scheduled Activity under Schedule 1 of the *Protection of the Environment Operations Act* (1997) and so, will not require an Environment Protection Licence under this Act,
- the proposal is not being undertaken by or on behalf of a NSW Public Authority, nor are there activities for which the EPA is the appropriate regulatory authority.

The EPA advises that it has previously provided advice in relation to contaminated land management for Modification 5 of this development, in a letter dated 30 September 2019 (our reference: DOC18/631997-4). An updated version of this advice is provided in Attachment A.

The EPA requests the Department of Planning, Housing and Infrastructure consider this advice in the assessment of this modification.

Please contact Afnan Fazli on (02) 8275 1455 or email [environmentprotection.planning@epa.nsw.gov.au](mailto:environmentprotection.planning@epa.nsw.gov.au) if you wish to discuss this matter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Wearne', with a long horizontal stroke extending to the right.

**Paul Wearne**  
**A/Unit Head -Statutory Planning**

**Phone** 131 555  
**Phone** +61 2 9995 5555  
(from outside NSW)

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[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)

## Attachment A – Contaminated Land Management

The environmental outcome of the project is to ensure any contaminated land is identified and appropriately managed for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

The EPA provides the following advice:

- Consideration should be given to the use of site auditor accredited under the *Contaminated Land Management (CLM) Act 1997*. The site auditor could be engaged to provide a site audit statement (SAS) and accompanying site audit report (SAR) certifying suitability of the land for the proposed land use.
- The following guidance, as relevant, should be considered, when assessing contamination at the site:
  - NSW EPA Sampling Design Guidelines: <https://yoursay.epa.nsw.gov.au/sampling-design-guidelines>
  - Guidelines for the NSW Site Auditor Scheme (3<sup>rd</sup> edition) 2017 <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/contaminated-land/17p0269-guidelines-for-the-nsw-site-auditor-scheme-third-edition.pdf>
  - Guidelines for Consultants Reporting on Contaminated Sites, 2020 <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/contaminated-land/20p2233-consultants-reporting-on-contaminated-land-guidelines.pdf>
  - The National Environment Protection (Assessment of Contamination) Measures 2013 as amended.
- The processes outlined in *State Environmental Planning Policy (Resilience and Hazards) 2021* – Chapter 4 Remediation of Land be followed and documented, to assess the suitability of the land and any remediation required in relation to the proposed use.
- If the planning proposal is approved, any proposed development should not result in a change of risk in relation to any pre-existing contamination on the site, so as to result in significant contamination [note that this would render the proponent the 'person responsible' for the contamination under Section 6(2) of Contaminated Land Management Act (CLM) 1997].
- The EPA should be notified under Section 60 of the CLM Act for any contamination identified which meets the triggers in the Guidelines for the Duty to Report Contamination <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/clm/150164-report-land-contamination-guidelines.pdf>
- The EPA recommends use of “certified consultants.” Please note that the EPA’s Contaminated Land Consultant Certification Policy (<https://www.epa.nsw.gov.au/your-environment/contaminated-land/managing-contaminated-land/engaging-consultant>) supports the development and implementation of nationally consistent certifications schemes in Australia, and encourages the use of certified consultants by the community and industry. Note that the EPA requires all reports submitted to the EPA to comply with the requirements of the CLM Act to be prepared, or reviewed and approved, by a certified consultant.

Our Ref: ID 2242  
Your Ref: MP06\_0094 MOD 6

19 January 2024

Elena Sliogeris  
Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

email: elena.sliogeris@dpie.nsw.gov.au  
CC: amanda.pollock@ses.nsw.gov.au

Dear Elena,

### **Proposed Modification of the Sandon Point Concept Plan**

Thank you for the opportunity to provide comment on the proposed modification of the Sandon Point Concept Plan. It is understood that the proposed modification seeks to:

- Amend the total number of Independent Living Units (ILU) from 191 to 229 and a reduction in Residential Aged Care Facility beds from 80 to 41
- Amend the total gross floor area from 28,965m<sup>2</sup> to 34,139m<sup>2</sup>
- Increase the landscape area from 6,650m<sup>2</sup> to 8,015m<sup>2</sup>
- Increase the building height of ILU's in Precinct 1 from 11.4m to 15.5m
- In Precincts 2 and 3: replace the standard (non-seniors housing) dwellings in the form of dual occupancy and multi-dwelling housing to ILUs in apartment 'clusters' with basement parking, thereby increasing the number of dwellings from 51 to 88
- Provide basement parking to all buildings.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami in NSW. This role includes, planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

The NSW SES recommends that consideration of flooding issues is undertaken in accordance with the requirements of NSW Government's Flood Prone Land Policy as set out in the [Flood Risk Management Manual 2023](#) (the Manual) and supporting guidelines, including the [Support for Emergency Management Planning](#) and relevant planning directions under the Environmental Planning and Assessment Act, 1979. The floodplain risk management issues which are of concern to the NSW SES are detailed in Attachment A.

While we understand that there is a small net increase in the number of people exposed to the flood risks at the site, in summary we:



- **Note** that the southern half of the proposed site will become isolated in at least the 1% Annual Exceedance Probability (AEP) and rarer events, restricting evacuation.<sup>1</sup> Therefore, the modification to the proposal will increase the number of people exposed to the effects of flooding and the risk of secondary emergencies such as fires and medical emergencies.
- **Recommend** investigating access/egress routes that remain flood free up to the PMF to reduce the frequency of isolation of the proposed community, particularly as it involved aged care.
- **Recommend** additional modelling is undertaken to ensure the 'Emergency vehicle and substation access' remains above the Probable Maximum Flood (PMF) extent as the Flood Impact Assessment appears to show overland flow in this area during a PMF event<sup>2</sup>.
- **Recommend** ensuring that all openings to the basements (ramp vents etc) are situated above the PMF, particularly in the area of the proposed Emergency Vehicle Access, or reconsidering basement carparking if this is not feasible to reduce risk to life and property.

You may also find the following Guidelines, originally developed for the Hawkesbury Nepean Valley and available on the NSW SES website useful:

- [Reducing Vulnerability of Buildings to Flood Damage](#)
- [Designing Safer Subdivisions](#)
- [Managing Flood Risk Through Planning Opportunities](#)

Please feel free to contact Gillian Webber via email at [rra@ses.nsw.gov.au](mailto:rra@ses.nsw.gov.au) should you wish to discuss any of the matters raised in this correspondence. The NSW SES would also be interested in receiving future correspondence regarding the outcome of this referral via this email address.

Yours sincerely



Elspeth O'Shannessy  
Manager, Emergency Risk Assessment  
**NSW State Emergency Service**

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<sup>1</sup> Cardno (2019) Flood Impact Assessment. Proposed Aged Care Facility at Bulli.

<sup>2</sup> Cardno (2019) Flood Impact Assessment. Proposed Aged Care Facility at Bulli, Post Development Flood Extent PMF, Page 66.

## ATTACHMENT A: Principles Outlined in the Support for Emergency Management Planning Guideline<sup>3</sup>

### **Principle 1 Any proposed Emergency Management strategy should be compatible with any existing community Emergency Management strategy.**

Any proposed Emergency Management strategy for an area should be compatible with the evacuation strategies identified in the relevant local or state flood plan or by the NSW SES. Per the Illawarra Local Flood Plan, evacuation is the primary risk management strategy for flooding. Development strategies relying on deliberate isolation or sheltering in buildings surrounded by flood water are not equivalent, in risk management terms, to evacuation.

### **Principle 2 Decisions should be informed by understanding the full range of risks to the community.**

We note the Pre-Development modelling of the 1% AEP and PMF flood events show the southern part of the site becomes a low flood island due to an overland flow path forming from the overflow of Tramway Creek. Accordingly, the site becomes isolated first before the western portion of the flood island is inundated with flood waters up to 0.75 metres in depth and 2-3 m/s velocity in the PMF.<sup>4</sup>

The development proposes to minimise the flood risk at the site through a number of risk management measures including fill to PMF plus freeboard, inlet pits and a series of box culverts to the western boundary of the site. It also proposes to replace the culvert under Geraghty Street.<sup>5</sup> The resultant area therefore becomes a high flood island, subject to isolation by flood waters in excess of 1.5 metres in depth and 3m/s in velocity in the PMF. The flood waters range from low to high hazard, which could pose a risk to life if people were to attempt to traverse the flooded roads<sup>6</sup>. We note modelling has not been included for more frequent flood events and accordingly the frequency and duration of isolation is unclear.

There is no known safe period of isolation, however, the longer the period of isolation, the higher the chance of incidences requiring external intervention. Even relatively brief periods of isolation, in the order of a few hours, can lead to personal medical emergencies that have to be responded to. During flooding it is likely that there will be a reduced capacity for the relevant emergency service agency to respond in these times.

Where secondary emergencies occur, people may choose to leave the site, entering dangerous floodwater. **NSW SES is opposed to development strategies that transfer residual risk, in terms of emergency response activities, to NSW SES and/or increase capability requirements of the NSW SES.** Further, Ministerial Direction 4.1 states a planning proposal

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<sup>3</sup> NSW Government. 2023. Principles Outlined in the Support for Emergency Management Planning Guideline

<sup>4</sup> Cardno (2019) Flood Impact Assessment. Proposed Aged Care Facility at Bulli.

<sup>5</sup> Cardno (2019) Flood Impact Assessment. Proposed Aged Care Facility at Bulli.

<sup>6</sup> Cardno (2019) Flood Impact Assessment. Proposed Aged Care Facility at Bulli.

must not permit development that is likely to result in significantly increased requirements for government spending on emergency management services, flood mitigation and emergency response measures.

We also take the opportunity to highlight that the majority of the site forms part of the current Tsunami Evacuation Zone, with the exception of the northwest portion of the site. If there was a land based tsunami warning, the occupants would be required to evacuate.

**Principle 3 Development of the floodplain does not impact on the ability of the existing community to safely and effectively respond to a flood.**

The ability of the existing community to effectively respond (including self-evacuating) within the available timeframe on available infrastructure is to be maintained and should consider the cumulative impact of the proposed modification.

**Principle 4 Decisions on redevelopment within the floodplain does not increase risk to life from flooding.**

Risk assessment should consider flood warning and evacuation demand on existing and future access/egress routes considering potential impacts of localised flooding.

We recommend careful consideration of the proposed development, likely users, and their ability respond to minimise their risks. This includes consideration of:

- Isolation – There is no known safe period of isolation in a flood, the longer the period of isolation the greater the risk to occupants who are isolated.
- Secondary risks – This includes fire and medical emergencies that can impact on the safety of people isolated by floodwater. The potential risk to occupants needs to be considered and managed in decision-making.
- Consideration of human behaviour – The behaviour of individuals such as choosing not to remain isolated from their family or social network in a building on a floor above the PMF for an extended flood duration or attempting to return to a building during a flood, needs to be considered.

Isolation of sensitive facilities exacerbates the issues highlighted above.

Development strategies relying on an assumption that mass rescue may be possible where evacuation either fails or is not implemented are not acceptable to the NSW SES. There are significant risks associated with mass rescue, including:

- Insufficient number of flood rescue boats for the number of people remaining on low flood islands.
- Insufficient air lift capacity.
- Severe weather which makes rescue by boat or air more difficult e.g. wind fetch caused waves.
- Potential exposure to sewage, contaminants, disease, poisons, hidden snags, dead animals and debris etc.

- Drowning or injuries related to floodwater hazards.

**Principle 5 Risks faced by the itinerant population need to be managed.**

As there is likely to be a high number of visitors to the site, the risk of people entering floodwater needs to be managed.

**Principle 6 Recognise the need for effective flood warning and associated limitations.**

As the site is impacted by flash flooding, there is little opportunity for the community to respond to a flood threat in an appropriate and timely manner.

**Principle 7 Ongoing community awareness of flooding is critical to assist effective emergency response.**

The flood risk at the site and actions that should be undertaken to reduce the potential risk to life should be clearly communicated to all site users, for example through signage and emergency drills, during and after the construction phase for the life-span of the development.



## Department of Planning and Environment

Our ref: DOC23/1124688  
Your ref: MP06\_0094 MOD 6

Tuong Vi Doan  
Planning Officer KSIA  
DPE Planning  
Email: [tuongvi.doan@planning.vsw.gov.au](mailto:tuongvi.doan@planning.vsw.gov.au)

Dear Vi

### **Sandon Point Concept Plan – Modification 6 – Anglicare Seniors Housing**

I write to you in response to your request for comment on the above major project modification received on 14 December 2024.

We note that this is a modification to an approved concept plan for the site and that the proposal is largely contained within the previously approved footprint, predominantly involving a change in the number and types of accommodation proposed to be built at the aged care facility. As a result, our detailed comments on previous modification applications and subsequent approvals are still valid.

In addition to our previously provided comments, below are some specific comments on the flood risk component associated with the current application.

#### **Floodplain Risk Management**

The development is located within flood prone land and therefore should be considered in accordance with the Secretary's Environmental Assessment Requirements and the NSW Government's Flood Prone Land Policy as set out in the NSW Flood Risk Management Manual, 2023. As the proposed development modification (MP06\_0094-Mod-6) is still affected by flooding and has the potential to affect flood behaviour, the previous advice relating to flood risk is still applicable.

The Flood Impact Assessment Proposed Aged Care Facility at Bulli (Cardno, Nov 2019) identifies that the design of Precinct 1 of the Proposed Facility located on the southern extent of the development will result in the isolation of vulnerable residents during flood events. There is no evidence of a risk assessment to address the resultant risks.

Given the potential risk to life associated with flood isolation of a vulnerable community, we recommend that the determining authority consult with the NSW SES on emergency management and accessibility issues and Wollongong City Council as the agency responsible for the residual risks associated with the proposed development. The determining authority should satisfy themselves that risk to life can be appropriately managed for the full range of floods and that the development will not cause an unacceptable risk to life for future occupants.

If you would like to discuss the contents of this letter, please contact Dan Robson, Senior Conservation Planning Officer, Planning, South East, Biodiversity and Conservation Division on 4224 4185 or [daniel.robson@environment.nsw.gov.au](mailto:daniel.robson@environment.nsw.gov.au).

Yours sincerely



Lorraine Oliver

**Acting Director South East**

**Biodiversity and Conservation Division**

**Environment and Heritage Group**

**Department of Climate Change, Energy, the Environment and Water (DCCEEW)**

**8 January 2024**

18 January 2024

TfNSW reference: STH09/00728/13

Your reference: MP 06\_0094 MOD 6

Project Officer

Department of Planning and Environment

By Email: carol.al-ali@dpie.nsw.gov.au

CC: DA\_sydneytrains@transport.nsw.gov.au

Attention: Carol Al-Ali

**MP 06\_0094 MOD 6 – Anglicare Sandon Point MOD 6 – LOTS 2 & 3, DP 1176767 – Sandon Point BULLI**

Dear Carol

Transport for NSW (TfNSW) is responding to MP 06\_0094 MOD 6 referred on 14 December 2023.

TfNSW has reviewed the information and does not support the proposed development in its current form. Transport's reasons are set out in Attachment 1.

TfNSW requests that the Department of Planning and Environment refers any subsequent submissions of the modification to Sydney Trains due to the proximity of rail land and various rail assets. Additionally, while the original consent included "RailCorp" conditions (now known as TAHE/Sydney Trains), TfNSW highlights these may need to be updated as a result of any modifications proposed.

If you have any questions, please contact Josiah Poulter, A/ Development Services Case Officer, on 02 9983 3879 or email [development.south@transport.nsw.gov.au](mailto:development.south@transport.nsw.gov.au).

Yours faithfully,



Josiah Poulter

Development Services Case Officer, Development Services

**MP 06\_0094 MOD 6 – Anglicare Sandon Point MOD 6 – LOTS 2 & 3, DP 1176767 – Sandon Point BULLI**

**Context**

TfNSW notes for this DA:

- The key state roads are the Princes Highway and Lawrence Hargrave Drive.
- The project proposes the construction of a seniors' housing development at Sandon Point including a Residential Aged Care Facility (RACF), Independent Living Units, and medium density residences.
- the construction of Geraghty Street Bridge in order to enable a southern connection to the state road network at Princes Highway/Point Street.
- MOD 6 proposes to increase the allowable height for ILUs and community facilities by one storey, reduce the number of RACF beds from 80 to 41, and increase the overall number of dwellings from 191 to 229.

**Reasons**

TfNSW's reasons for not supporting the proposed development are detailed below:

- The previously requested SIDRA traffic modelling has not been provided to verify that the impacts of increased traffic at key intersections adjoining the state road network will be acceptable. The modification does not include this analysis.
- No commitments have been made regarding the timing of the construction of Geraghty Street Bridge relative to the rest of the development. This is a crucial detail as it dictates where and to what extent the additional traffic will impact the state road network.

To reconsider the proposed development, TfNSW requires the following:

- Intersection modelling using SIDRA needs to be undertaken for the junctions of Princes Highway/Point Street and Lawrence Hargrave Drive/Wrexham Road with consideration to the following:
  - o Current and representative traffic counts need to be used.
  - o The existing base models needs to be calibrated with onsite observations, for instance queue lengths and/or delays.
  - o AM and PM peaks volumes and Saturday peak and holiday peak volumes.
  - o Electronic copies of all SIDRA files need to be provided to TfNSW for review.
- Clarification of the timing for the delivery of Geraghty Street Bridge and identification of an appropriate planning mechanism to ensure it is delivered in an appropriate timeframe.