



STEP Inc

Community-based Environmental Conservation since 1978

18 June 2009

Director, Strategic Assessment
Department of Planning
GPO Box 39,
Sydney NSW 2001.

Attention: Emma Hitchens

Wahroonga Estate Redevelopment (Ref # 07 – 0166)

Dear Emma,

I am writing on behalf of STEP Inc in response to the Concept Plan for the proposed Wahroonga Estate Redevelopment (WER).

A. About STEP Inc

STEP Inc is the largest community environmental group in the northern Sydney region. It has over 400 members and has been operating in the Ku-ring-gai and Hornsby area for over thirty years. STEP has developed deep expertise and knowledge of the fauna and flora of the area during this time, as is evidenced by its various publications including the well regarded "*Field Guide to the Bushland of the Upper Lane Cove Valley*" by Dr John Martyn, who is a current STEP Committee member.

STEP has used its member's expertise in completing this fact based submission. In particular, the section reviewing the vegetation impacts of the proposed development has been completed by Dr Michelle Leishman, Senior Lecturer in the Department of Biological Sciences at Macquarie University and reviewed by Dr John Martyn. Our comments on the likely traffic impact have been reviewed by Mr Anton Reisch, a local resident and an expert traffic and transport consultant.

STEP has a good knowledge of the detail of the WER Concept Plan proposal, as both Dr Leishman and I are members of the Community Reference Group set up by the Minister for Planning to facilitate the planning assessment process for the proposed development.

B. The STEP View

STEP Inc opposes the WER Concept Plan, as it is currently proposed, for the following reasons:

- The scope of the WER Concept Plan represents a significant over-development of the site, taking it well beyond its current designation as a specialised medical centre.
- The traffic infrastructure, both current and planned, will be inadequate to support the full scope of the proposed development.
- The vegetation impacts of the WER plan are extreme and are unacceptable, not only in regard to the extent of destruction of Federal and State listed critically

- endangered bushland communities, but also in the unnecessary destruction of valuable linking corridor bushland for asset protection purposes.
- STEP believes the critically endangered Sydney Turpentine Ironbark (STIF) vegetation community on the site is far more extensive than given by the Cumberland Ecology Report. Consideration of the environmental impacts of the development should not proceed before the Commonwealth's consideration of the proposed development as a 'controlled action' in relation to STIF as well as Blue Gum High Forest (BGHF) under the Environment Protection and Biodiversity Conservation (EPBC) Act.

STEP will elaborate on each of these points in more detail below:

B.1. Scope of Concept Plan.

The stated intention of the WER is to expand and upgrade the hospital facilities of the SAN, but the Concept Plan in fact mainly focuses on the development of the land not related to the activities of the hospital. STEP recognises that expansion of hospital and the associated training facilities and accommodation for nursing may provide important community benefits. However STEP also understands that no more than 70 additional hospital beds are planned to be added to the existing 342 beds. It would seem therefore that the proposal is essentially about the development of a new "mini town and town centre", involving as it does a new retail centre, a new commercial centre, over 1200 new residential dwellings, a new high school and playing fields and additional nursing accommodation.

These new township development plans are well advanced and detailed, while the redevelopment plans for the hospital itself are marked by the absence of any significant detail. In STEP's view, this reinforces the suspicion that the Concept Plan uses the hospital expansion essentially as a decoy to justify seeking approval for the new residential and commercial developments. Such a development will change the main purpose of the site, from its current specialised medical centre focus to just another mega real estate development. It is however located in a site that is manifestly unsuited to such a development and as such it should not be countenanced in its current scale and format.

The Concept Plan states that WER will contribute to Ku-ring-gai Council (KMC) achieving its housing strategy targets within the Metropolitan Strategy and Northern Subregion Strategy by providing additional residential development within the LGA. However KMC is already well on track to achieving its housing strategy targets without this development. Furthermore, such a large medium-high density housing development that is out of character with the low density residential area, remote from the train line and from access to good public transport, is not consistent with the State's, KMC's or any other generally accepted good planning principles.

B.2.1 Traffic Implications –General comments

The location of a major new residential, retail and commercial "mini town centre", together with expanded church, schooling, nursing and hospital facilities, would normally require the prior installation of a robust servicing infrastructure, including all necessary transport, parking and roadway provisions. Therefore, when such a development is proposed within an existing residential environment, such as is the case with WER, the requirement must be to meet the significant transport infrastructure challenges to cater for the demands of the additional traffic generated by the size and scope of the total development, *before* any work on the development itself can commence.

In the case of the WER these challenges are amplified by its location as a specialised medical facility situated within an existing residential area serviced by essentially two only extremely busy single lane roads. These roads, Fox Valley Road and Comenarra Parkway, were never designed to service the much expanded demands posed by the new residential township, plus the proposed new schooling, retail and commercial real estate developments. They, and their associated intersections, are already at capacity in the morning peak, school afternoon rush and afternoon/evening peak.

These roads will require significant upgrading if the development goes ahead as currently proposed. However, their current limitations will be difficult to overcome, as the developers own expert traffic report by Masson Wilson Twiney (MWT) states quite clearly that, while significant structural improvements to the road works are indeed required, these will be difficult to achieve as "existing road reservations and the private ownership of adjacent properties constrain improvement opportunities and in some cases *it would not be possible to improve on present operating conditions*" (STEP emphasis). Thus the conclusion by MWT that "the precinct's access road system would be able to satisfactorily accommodate traffic arising from the proposed development subject to some traffic management improvements" is not supportable, given that the identified traffic management improvements are unlikely to be achievable.

What exacerbates this already difficult situation however is the fact that these two single lane roads primarily empty traffic directly into two of the busiest roadways in the entire Sydney region, namely Pennant Hills Road and Pacific Highway. These are both main arterial roadways carrying high volumes of regional and interstate trucking and commercial vehicles, as well as having to serve as traffic conduits for local residents. The intersections with Fox Valley Road and Pacific Highway, and the intersection with Pennant Hills Road and Comenarra Parkway, in effect act as two gigantic bottlenecks which already cause long peak time traffic delays. These delays will worsen if the WER development proceeds as currently planned and without the identified traffic infrastructure improvements being completed *prior* to development commencement.

What this bottleneck restriction does is to cause many drivers to attempt to use local sub roads to escape the congestion delays, resulting in residential "rat run" activity. The additional traffic generated by the WER development plan will only worsen this type of activity. For example, the WER proposal will encourage 'rat running' between Comenarra Parkway and Fox Valley Road if the 'Residential East' area is developed.

The Comenarra Parkway from Fox Valley Road to Ryde Road is increasingly also becoming a route chosen by through traffic as a toll free alternative to the M2 and by local traffic using the SAN hospital and local shopping facilities. The WER development will greatly increase this traffic flow, along a road whose topography and alignment does not generally encourage heavy traffic flows or bus traffic. It is in fact currently weight restricted to vehicles less than 3 tonnes tare.

o **Hornsby Shire Housing Strategy Impacts**

In the case of the Comenarra Parkway [and Wood Street] / Pennant Hills Road intersections, this bottleneck problem will be worsened by recent development proposals under the Hornsby Housing Strategy Plan. This Strategy plans to redevelop the area to the left of the Comenarra Parkway at the intersection with Pennant Hills Road, into five story high rise housing units, while allowing ten story commercial developments on the directly opposite side of Pennant Hills Road. This will bring significant additional population and traffic into the area, whose impacts have not been taken into account in the traffic studies done to date for the WER site.

It is widely conceded that the section of Pennant Hills Road that links the M2 to the F3, and that runs through this intersection at Thornleigh, is already running at maximum capacity in normal times and is often dangerously overcrowded at peak times. There has been for some time now a proposal for a new tunnel to link the F3 to the M2 but there are no current funding arrangements or agreements at either State or Federal level to allow this work to commence. Given current economic circumstances in Australia, STEP and many expert commentators do not foresee any such funding agreements being reached any time soon. No assured reliance can be placed on this project ever commencing, let alone in a time frame to improve the functioning of this intersection in any meaningful way for the purposes of the WER plans.

STEP is of the view that no approvals be given for the WER plan until the long mooted improvements to alleviate this situation are in place and proven to be working. (See also detailed intersection upgrade commentary further on).

- **Increase in traffic levels.**

While STEP has no cause to question the methodology used in the traffic generation assumptions made by Masson Wilson Twiney (MWT) in their report, we do believe that they may be optimistic and underestimate the likely level of real additional traffic generated by the development.

Consider:

- The site is poorly served by public transport, with no train station within walking distance. The nearest railway stations, Thornleigh and Warrawee, are 2 and 3 km away from the site respectively. Cars will remain the principle form of transport for staff, residents and patients.
- The SAN already employs 2,200 staff and the Concept Plan suggests that it will generate up to an additional 5,000 jobs, with many having to use their cars to get to and from work.
- The current 200,000 patients cared for by the SAN each year are expected by the SAN to increase with the planned hospital expansion by at least 68% over the next twenty years. Most of these will continue to be ferried in and out by car.
- The proposed residential and commercial developments will together lead to much increased levels of motor traffic.
- The proposed K-12 800 student school will generate significant traffic in the morning and mid-afternoon peaks when Fox Valley Road is already struggling due to hospital visitors and traffic going to the many other local schools and kindergartens.
- School commencement times increasingly tend to coincide with morning traffic peaks, a fact perhaps underestimated by MWT in their planning assumptions.
- Car sharing is held out as a partial solution but even if effective will not apply to the majority of site users mentioned above.

Given the above factors, STEP believes that the conclusion by MWT and in the Concept Plan that the additional traffic generated can be satisfactorily accommodated is very optimistic and that it would be more realistic to test higher traffic usage assumptions than those currently being modelled.

B.2.2 Traffic Implications – intersection upgrade comments

It is accepted by MWT that the success of the WER plan is highly dependant on a number of intersection upgrades. Generally STEP accepts the recommendations made by MWT and supports them as being necessary if the Concept Plan proceeds. However, as STEP has pointed out above, MWT themselves raise doubt that these upgrades will be able to be achieved in all cases. STEP is fearful that a least/worst case outcome may result, with

some upgrades being done whilst others are never completed. This will be a recipe for long term planning disaster!

STEP therefore strongly recommends that any approval to allow any form of development of the WER Concept Plan to commence be strictly conditional upon the prior completion of *all* recommended roads improvements and intersectional upgrades. Such work needs to be completed prior to any development commencing (for example, by making the issuing of Construction Certificates contingent on the upgrades being completed and traffic re-assessed), as experience has shown that it is seldom possible to reverse or stop developments once they have commenced. They in effect create their own momentum and a new reality. STEP would see it as being a key indicator of WER bone fides if this was accepted as a development pre-condition.

While STEP accepts in general the MWT recommendations for road and intersectional upgrades, we wish to comment in detail in a number of specific cases where STEP believes the MWT plans are deficient.

- **Pennant Hills Road and Comenarra Parkway**

STEP believes that the current MWT plans with regard to this intersection are deficient and need to be re-examined for the following reasons:

- They do not take into account the impacts on the performance of this intersection of the Comenarra Parkway intersection with Wood Street, which is situated immediately prior to its intersection with Pennant Hills Road (approximately 100 meters only). For all intents and purposes the two intersections operate as one and any planning should include that fact. The MWT report did not specifically look at the Wood Street intersection at all, and yet Comenarra Parkway traffic uses the Wood Street turn off as a major left turn alternative "rat run" detour around the Thornleigh Market Place shopping centre and on to Pennant Hills Road using Bellevue Street and other streets elsewhere in Thornleigh.
- The MWT plan seems to approach this intersection from the point of view of improving traffic flows into Comenarra Parkway off Pennant Hills Road, yet the biggest traffic congestion actually occurs from cars on Comenarra Parkway trying get onto Pennant Hills Road. In this regard the MWT plan offers no improvement. Every day of the working week there are morning and afternoon queues stretching back a kilometre from Wood Street to Fox Valley Road. The situation is untenable now and will get much worse if the WER plan is approved.
- The absence of any consideration of the impacts which the Hornsby Housing Strategy, referred to above, will have on this intersection. The streets around the proposed development are narrow and will be required to accommodate considerable additional local traffic and the inevitable on street parking that goes with multi story residential apartment blocks. The following points in particular need to be taken into consideration:
 - This additional traffic will become prime users of the two intersections and will add to the considerable congestion already evident. The Thornleigh Market Place shopping centre is increasingly attracting shoppers from further afield; all use their cars to access the centre. There are now plans for ALDI to locate a new shopping centre on

Pennant Hills Road alongside the existing Thornleigh Market Place; this will attract even more road traffic to this congested area.

- Thornleigh Station is not easily accessible; yet it is increasingly used by commuters from as far afield as Cherrybrook and elsewhere on “park and ride” basis. Local rail car parking arrangements are already unable to cater for all of these commuters and their numbers are expected to increase. The result is that demand for nearby roadside parking spaces continues to increase and the narrow road system further congests.
- MWT propose the elimination of the right hand turn from Pennant Hills Road into Parkes Street, suggesting that traffic can alternatively make such turns either to the north and south of the intersection. This is incorrect; Parkes Street is the only right turn for most traffic wanting to use the drop off zone for Thornleigh Station and to gain access to the local industrial and commercial area.
- Pedestrian safety is becoming a real issue in this area now as the “rat run” frustrations manifest themselves in dangerous road behaviour. Recent incidents include a child knocked down on the eastern side of Station Street by a car that did not stop at the stop sign (a frequent occurrence in the area). Incidences of both cars and motor cycles using the foot paths to try to circumvent traffic hold ups are becoming increasingly frequent.

STEP believes that a new holistic planning review needs to be undertaken, including inputs from both the RTA and Hornsby Council, as to how traffic management in this area will take place over the next two decades. Short term plans in isolation of each other will only produce chaos. Such a review needs to be completed prior to any further consideration of the traffic impacts of the WER being undertaken.

- **Comenarra Parkway/Wood Street**

See comments above.

- **Comenarra Parkway/Fox Valley Road**

Provided these are implemented prior to development commencing, STEP supports the MWT recommendations.

- **Fox Valley Road/ Pacific Highway**

Provided these are implemented prior to development commencing, STEP supports the MWT recommendations.

- **Comenarra Parkway/Kissing Point Road**

The upgrade proposal here is for a left hand turn slipway from Comenarra Parkway (west) to Kissing Point Road (north) plus an extension of the existing right hand turn lane from Kissing Point Road (north) into Comenarra Parkway (west).

STEP believes that the first of these upgrades would endanger the safety of pedestrians, particularly children attending the nearby Turramurra Primary School. Children would be required to cross Comenarra Parkway in two separate journeys, as opposed to the existing single crossing by the western crossing using signals. The proposed alternative would see children having to cross Comenarra Parkway to the “safety” of a small island and then proceed on to cross Kissing Point Road.

Both of these options are less safe compared with the current street crossing arrangement. STEP suggests that these aspects be re-examined with a view to maintaining the safest possible movements for children, using a better traffic design to achieve improved intersectional performance together with existing safety standards.

- **Yanko Road/Ryde Road**

This intersection will be adversely impacted by additional traffic arising out of the WER development, a fact acknowledged in the MWR report (table 4.8). It already performs poorly at peak times, with traffic banking up as far back as Kendall Street. This is expected to worsen as the number of trips arising out of Ryde Road increase under WER. **STEP recommends that MWR assess this intersection as part of their planning for WER.**

- **Osborn Road**

MWT propose to connect Mount Pleasant Avenue to Osborn Road as a measure which will “markedly improve the safety of those [Mount Pleasant Avenue] residents”. Safety is unfortunately already a significant issue at the Osborn Road/Pennant Hills Road intersection, due to the poor visibility caused by the local topography and the often high speeds maintained by the traffic recently exiting the nearby F3. Local residents report frequent “near misses”, both for motor traffic and for pedestrians (who have to use a very narrow footpath). Additional traffic flows may well worsen, not improve, the safety situation for users of this intersection.

It should be noted that Osborn Road is quite narrow and is currently the only exit onto Pennant Hills Road for the 210 households (approximately 600 residents) living in the six local roads which need to use it to access their dwellings. It is in addition the main access point for the nearby High School, Loreto Normanhurst. The 900 students gain vehicular access to the school by use of buses and cars, all of which need to use Osborn Road. Osborn Road is also used by all delivery vehicles and visitors to the school, including the large number of local community members who use the school swimming pool and gymnasium facilities. In many cases these users have to end up parking in Osborn Road due to a lack of on site parking at Loreto.

Therefore, while the MWT reports fairly low traffic generation, local residents report extremely congested morning and afternoon peaks and during Loreto sports functions. STEP is of the view that the proposed connection of Osborn Road to Mount Pleasant Avenue is likely to prove significantly counter productive and less safe for current residents of Osborn Road.

STEP also refers to the NSW Roads and Traffic Authority Submission in this regard, especially to their comment that “Upgrades to the following intersections may be required – some of these upgrades will require land acquisition” in which specific reference was made to assessing for possible upgrading the Mount Pleasant Avenue/Pennant Hills Road intersection (see Appendix E.1.2.3). The MWT report appears to have not undertaken this particular intersection upgrade assessment, nor to have assessed expected future traffic flows in this area. STEP recommends that these assessments take place.

B.2.3 Traffic recommendation

Given the importance of additional traffic flows to the viability of the highly constrained WER site, STEP recommends that the entire traffic report by Masson Wilson Twiney be revisited and updated to take into account the additional information provided in this submission, concerning the intersections mentioned in the MWT report, as well as the key intersections that they did not study, namely Comenarra Parkway/Wood Street, Mount Pleasant Avenue/Pennant Hills Road and Yanko Road/Ryde Road .

B.3. Biodiversity impacts

Summary

The proposed residential development outlined in the Concept Plan will create unacceptable impacts on the natural vegetation and habitat values of the site. These impacts include significant loss of State- and Federally-listed endangered and critically endangered ecological communities, clearing or substantial modification of vegetation, totalling over 23 ha, fragmentation of remaining vegetation resulting in dramatically reduced long term sustainability, substantial impact on riparian zones leading to Lane Cove National Park located downstream of the development, and loss of habitat for endangered fauna.

The site currently has 37 ha of natural vegetation. This is distributed mainly between two large areas: the Coups Creek and Fox Valley Creek corridors. Both these corridors connect Lane Cove National Park to bushland areas to the north and are recognised as important for fauna habitat and movement. For example, the area is recognised as a significant fauna corridor by the Sydney Metropolitan Catchment Management Authority. They also provide important corridors southward for plant and animal dispersal under climate change. The nature of the proposed development close to bushland areas will require large areas (17.7 ha) to be substantially cleared and modified as asset protection zones (APZs), in addition to clearing for development (5.7 ha). 72% of the site under the Concept Plan is described as 'open space' but much of it will be fragmented and mown for asset protection. Connectivity between bushland areas will be dramatically reduced, particularly in the area of the site recognised as 'Residential East', and the edge to core ratio of all remaining bushland will be substantially increased, resulting in weed invasion, negative impacts on biodiversity and reduced long-term sustainability. **Thus the proposed development constitutes an unacceptable impact on the bushland that provides these important linking corridors.**

The site contains Blue Gum High Forest (BGHF) which is listed as critically endangered under the NSW Threatened Species Conservation (TSC) Act and Commonwealth Environment Protection and Biodiversity Conservation (EPBC) Act, and Sydney Turpentine Ironbark Forest (STIF), which is listed as endangered under the NSW TSC Act and critically endangered under the Commonwealth EPBC Act.

There are significant inconsistencies in mapping of vegetation communities between the Cumberland Ecology report provided with the Concept Plan, and Ku-ring-gai Council (KMC). Given that the Cumberland Ecology report is based on a previous inadequate report by consultants Conacher Travers with a small amount of additional vegetation sampling, and that KMC have previously extensively mapped these vegetation communities throughout Ku-ring-gai, STEP believes that the assessment and mapping done by KMC much better represents the vegetation of the site. This substantially changes the assessment of loss of the BGHF vegetation community to 100% loss of 0.56 ha, and increases the estimation of impacts on STIF (78% loss of 9.38 ha). For example

bushland areas in the Mt Pleasant and Central precincts that were not mapped correctly as STIF are identified as an APZ, thus underestimating the effect of APZ clearing on this endangered ecological community. Similarly, the actual area of BGHF near the proposed school is much smaller than identified in the report, with the result that APZ clearing will result in the loss of this critically endangered community. In the precinct east of Fox Valley Road, STIF has been underestimated and BGHF overestimated, resulting in a much larger area of STIF and a much larger proportion of BGHF on site being cleared for housing and commercial development. **Given the scarcity of these critically endangered ecological communities, the proposed development represents an unacceptable loss.**

The larger area of STIF on the proposed site identified by KMC mapping would satisfy the description of STIF under the EPBC Act, thus requiring the proposed development to be determined a controlled action by the Department of the Environment, Water, Heritage and the Arts (DEWHA). **Consideration of the environmental impact of the proposed development should not proceed before the Commonwealth's consideration of the development as a 'controlled action' in relation to STIF as well as BGHF under the EPBC ACT.**

Remnant trees of BGHF and STIF are recognised under the TSC Act as having conservation significance for BGHF and STIF; however these have not been identified or considered within the Cumberland Ecology report and Concept Plan.

Fauna listed as vulnerable or endangered such as the Grey-headed Flying Fox and Powerful Owl are likely to be significantly affected by the loss of habitat. In particular, the nesting site of the breeding pair of Powerful Owls is likely to be compromised, significantly affecting their breeding success.

The Concept Plan suggests that a Bushland Management Plan will be prepared as part of the development proposal that would detail ongoing management and monitoring of retained vegetation, fauna and their habitats. While this is a good idea in principle, the proponents (ACA) have not previously shown any interest in bushland management or any interest in engaging with KMC or the community on the management of their bushland resource. In fact they have been asked to prepare a vegetation management plan by previous councils but never delivered. **Consequently, STEP would support transfer of all bushland owned by ACA to Lane Cove National Park but with the provision that funding is provided for maintenance via a capital contribution sufficient to establish a trust fund sufficient for this purpose.** For example, the transfer of ~370 ha of bushland from Hornsby Shire Council to Lane Cove National Park a decade ago was associated with additional annual funding of \$600,000 from the New South Wales Treasury.

B.4. Bushfire impacts

The proposed WER is entirely within a Bushfire Evacuation Risk area. The development has a number of problems associated with bushfire risk including access and evacuation difficulties, and traffic flow problems during an emergency. The large areas of fire-prone bushland adjoining the site, plus the rugged nature of the topography, pose a significant bushfire risk to the proposed development. This includes a substantial bushfire risk to residents of the proposed development as well as risk to residents of Fox Valley needing to evacuate in a bushfire.

In order to comply with regulations concerning development in bushfire prone areas, an extremely large area of bushland (17.7 ha) would need to be substantially modified to create asset protection zones. The submission from KMC suggests that the size of the

required APZs is underestimated, so that the impact on bushland may be greater than stated in the Concept Plan.

In addition, critically endangered ecological communities STIF and BGHF will be substantially impacted by clearing for asset protection. For example, the location of the proposed school requires clearing of the critically endangered BGHF for asset protection, and proposed housing in 'Residential East' and commercial development along Fox Valley Road requires clearing of the endangered STIF for asset protection.

It is STEP's position that the proposed development would create an enormous impact on the natural environment of the site due to the very large area of clearing required for asset protection, including of ecological communities listed as critically endangered. We suggest that alternatives to large-scale vegetation clearing to provide for asset protection should be explored. This could include engineering solutions such as fire-rated barriers on the residential edge. STEP would be happy to assist in the formulation of these improved solutions.

The current Concept Plan allowing for large APZs, in addition to the risks associated with evacuation in such a constrained location, represents an unacceptable over-development of the site and impact on native vegetation.

B.5. Ecologically Sustainable Design

The Concept Plan plays little more than lip-service to the concept of ecologically sustainable design. The housing design merely conforms to BASIX requirements. There are many opportunities for ESD on site, including solar orientation of buildings, energy and water-use efficiencies, solar panels on rooftops, rooftop gardens, etc but these have not been considered. The concept of the site being a live-work site and thus reducing the need for car trips in and out of the site sounds good, but there are no clear plans for how housing will be preferentially directed towards hospital workers.

Stormwater run-off from the site will have a dramatic effect on downstream bushland. Water Sensitive Urban Design has not been adequately addressed, and in STEP's opinion even best-practise WSUD would still result in an unacceptable impact via nutrient pollution into Lane Cove National Park. Coups Creek is the headwaters of the Lane Cove River and thus any development affecting it or its tributaries is likely to have a substantial impact on Lane Cove National Park in terms of water quality, aquatic habitat quality and weed invasion in the riparian zone. The Concept Plan fails to identify Coups Tributary 2 and proposes detention basins in three of the seven existing drainage lines. In STEP's opinion, development upslope of riparian areas inevitably results in their decline, largely due to increased sediment and nutrients resulting from stormwater runoff. Such an impact in the headwaters of one of the largest rivers in the Sydney area, contained largely within a National Park, is unacceptable.

We suggest that any development on site must be accompanied by a comprehensive water sensitive urban design that recognises and retains natural water courses, and aims to retain runoff on site. In particular, no stormwater runoff should be allowed to enter non-riparian areas of bushland.

SUMMARY

The Concept Plan should be substantially revised to focus on the hospital-related use of the site. The residential development proposed is not required within Ku-ring-gai, is not consistent with the character of the local area, is inconsistent with planning guidelines of the Metropolitan and Northern Subregional strategies, represents a significant bushfire risk, and poses an unacceptable impact on the natural characteristics of the site and adjoining Lane Cove National Park.

Specifically:

- development of the 'Residential East' precinct represents an unacceptable impact on critically endangered ecological communities and should not be allowed.
- development of the 'Mt Pleasant' precinct represents an unacceptable impact on STIF and a fire evacuation risk and should not be allowed.
- the proposed school should be reduced in size to a K-6 school to reduce traffic impacts and to remove the necessity for clearing of BGHF.
- any development consent MUST be contingent on upgrades to identified intersections to reduce traffic impact.
- the impact on STIF should be referred to the DEWHA as a 'controlled action' under the EPBC Act.
- alternatives to large-scale clearing of bushland for APZs should be considered.
- a comprehensive WSUD should be developed for the site that ensures no transfer of sediment or nutrients from the site into adjoining bushland.
- all bushland on site should be retained for conservation purposes and transferred to the National Parks Estate to ensure its protection in perpetuity. This must be accompanied by provision of adequate funds to Lane Cove National Park for ongoing maintenance.

Yours faithfully,

Barry Tomkinson

Barry Tomkinson
STEP Inc