

Attention: Ms Shruthi Siram  
Department of Planning and Environment  
[shruthi.siram@dpie.nsw.gov.au](mailto:shruthi.siram@dpie.nsw.gov.au)

26 September 2022

Dear Ms Siram

RE: Planning Proposal PP-2022-658- Lourdes Retirement Village – 97 Stanhope Road Killara

*“Land-use planning decisions have a far reaching and long-lasting consequences as to how exposed and vulnerable the community will be to future natural hazards. Where land-use planning decisions do not effectively incorporate natural hazard risk, future impacts of natural disasters will be higher”. November 2021*

The above quote is taken from the NSW Government “Planning for a more resilient NSW – A strategic guide to planning for natural hazards.” November 2021.

- The Stockland Planning Proposal (PP) does not satisfy the strategic objectives for planning for a more resilient NSW or for climate change.
- The PP seeks to retain the use as a retirement village and intensify the number of dwellings and occupants and is inappropriate on land with the highest risk to life and property i.e., senior’s living.
- Due to inaccuracies, omissions and flawed assumptions, the PP does not adequately consider and respond to fire hazard and risk, and impact on biodiversity
- The PP has no strategic merit as it is inconsistent with the Greater Sydney Region Plan, North District Plan, Ku-ring-gai LEP 2015, and Ku-ring-gai housing Strategy.
- The PP will set a dangerous legal precedent. If approved, it will result in the expectation across Ku-ring-gai and NSW, that the Planning Minister and his department will ignore appropriate land use and hazards to deliver housing.

The PP (Planning Proposal) at 95 – 97 Stanhope Road, Killara seeks to:

- rezone the site from R2 Low Density Residential to R3 Medium Density Residential
- amend the DCP maximum buildings heights for R3 from 9.5metres to up to 24metres in height (to allow 2 to 7 storey residential flat buildings)
- introduce 68 medium density residential units on the interface with the bushland
- increase the FSR from 0.3:1 to 0.75:1
- nearly double the number of dwellings – 83 bed residential aged care facility to 110 beds; 108 independent living units to 141; 49 serviced apartments to 63 medium density residential townhouses.
- provide 389 car parking spaces

The subject site is mapped as high bushfire prone land. It is identified on the biodiversity map and greenweb map. The site adjoins a heritage conservation area and heritage items.

**Friends of Ku-ring-gai Environment Inc. (FOKE) strongly objects to the Planning Proposal which enables significant intensification of development on the site to capitalise on the existing use as Senior's Living. The intensification proposed presents an unacceptable risk to an elderly vulnerable population and unacceptable impacts on the local community. Approval of this Planning Proposal will set an unacceptable legal precedent in Ku-ring-gai and NSW.**

## **BUSHFIRE HAZZARD RISK**

The site is adjoined by Category 1 Bush Fire Prone Vegetation to the south and east. About one third of the site is mapped high bushfire prone with the associated buffer covering another third of the site. Bushfire prone maps are prepared by council and certified by the Commissioner of RFS.

The most important objective for strategic planning is to identify whether new development is appropriate subject to the identified bush fire risk. In our opinion, the bushfire risk has not been given proper consideration and the rezoning rationale does not respond adequately to risk.

1. The *Department of Planning and Environment* considers the planning proposal to be inconsistent with clause (6)(b) of Ministerial Direction 4.4.
2. NSW RFS have indicated their satisfaction with the proposed performance-based approach. In our opinion, the RFS has not complied with 1.45.5. or 4.4 requirements of the *RFS Planning for Bushfire Protection November 2019*.

- **1.4.5 Performance based solutions.** Performance based solutions must provide substantiated evidence and clearly demonstrate how the specific objectives and performance criteria are to be satisfied.

The Masterplan is illustrative and insufficient information is provided to “provide substantial evidence” that demonstrates objectives and criteria can be satisfied.

- **4.4 Consultation with the NSW RFS** should occur during the development of any Masterplan or Precinct Plan on BFPL with consideration given to fire history and the potential impacts from bush fire.

The fire history which is available on council maps has been omitted from all documentation supporting the proposal. This is critical as it also provides evidence that significant fire paths from a North Easterly direction must be taken into consideration.

This contradicts the Blackash statement, *“While not part of the assessment criteria, given its location, any bushfires impacting the site would be burning under what is typically a cooler easterly or south-easterly wind.”*

3. The proponent's Bushfire Attack Assessment has assumed a Fire Danger Index (FDI) of 55. This is inconsistent with the assumption of a credible worst case fire scenario burning up to Catastrophic Fire Danger Rating (FDR) as required by Planning for Bushfire (PBF) 2019 and a Fire Danger Index (FDI) of 100.
4. The incorrect FDI results in incorrect calculation of radiant heat ratings and consequently the APZ requirements.
5. There exist discrepancies with effective slopes between council's and the proponent's Bushfire Assessment. Slope considerations are crucial. The rate of a bushfire's spread can double on upslopes of 10 degrees and double again at 20 degrees (Webster 2012).
6. The proponent's Bushfire Assessment:

- Fails to identify the existing risk present with adjacent vulnerable facilities Swains Manor Retirement Village, at 67 Stanhope Road consisting of 46 apartments and the 200 student Newington College Prep K-6 at 26 Northcote Rd, Lindfield with bushland contiguous with the subject site.
  - Fails to consider that both exits from the subject site lead to a single evacuation road and that Stanhope Road is a cul-de sac.
  - Fails to account for the additional evacuation pressure from the existing population in the area, nor does it include the 16 existing individual dwelling houses and their occupants located in Stanhope Road that share the same evacuation route as the subject site occupants.
  - According to the *Blackash Bushfire Assessment* a more detailed analysis of the vegetation, including the impact of the sandstone outcrops, creek lines and the applicability of any Short Fire Run modelling will be undertaken as part of the detailed bushfire assessment, engineering, and design work at the DA stage. Given the bushfire risk and the vulnerability of the existing and future occupants, these factors should be taken into consideration at the Masterplanning Stage.
7. A Bushfire **Risk** Assessment or a peer review must be commissioned for the site. Given the omissions and inaccuracies in the proponent's Bushfire Assessment, it cannot be relied upon in a strategic bushfire study plan.
  8. The redevelopment of the Lourdes Retirement Village proposes to dispense with the standard provision of an Outer Protection Area (OPA) and to manage the entire village as an Inner Protection Area (IPA). The immediate effect of the proposal appears to prioritise increased site density over and above the elderly, immobile and vulnerable citizens creating the impression that commercial opportunities are the priority.
  9. The special Asset Protection Zone (APZ) for Retirement Villages provides for additional separation as a safety measure at 100 metres from the boundary interfacing a bushfire hazard to provide an increased safety buffer from bushfire attack which reflects the residents inherent restricted mobility, incapacities, health issues and special needs.  
  
The provision of the APZ of 100 metres is critical for protection of residents, emergency workers and fire-fighters. The APZ must be amended using the prescribed FDI 100.
  10. Within the first 50metres of the 100metre APZ, the PP will be located in the BAL Flame Zone, while the remaining 50% of the APZ on the site will not be lower from risk BAL 40 of extreme bushfire attack. These residential properties and therefore the full APZ should probably apply without exception.
  11. When slopes are in the excess of 18 degrees, some bushfire management practises become impossible and all become difficult...the canopy fuels in forests are more available to fire, significantly decreasing the safety benefits provided by the AZP and considerably increasing both the speed of any approaching fire and the rate of spread (ROS) at the interface. Maps indicate degree of slope in this location are in excess of 18 degrees.
  12. The proposal for non- senior's medium density development located within the BAL Flame Zone is unacceptable.  
Individual non-Senior's Living is inconsistent with the Existing Use Rights.
  13. Should private non senior's living be accepted, the 100m Inner and Outer APZ should be retained for the RACF.
  14. 9.5m high medium-density housing on the interface with Category 1 vegetation is proposed to provide a buffer to radiant heat for the development upslope. Due to the gradient of the slope and buildings heights up to 22m upslope, the building façades will be exposed to

ember attack and possibly direct flame impingement. The potential impacts from fire do not support the argument that the entire retirement village can be managed as an IPA.

15. Fully equipped fire fighters cannot operate within the Flame Zone - BAL FZ- until the fire has passed and the radiant heat levels have dropped from fatal levels to permit safe access to enable fire-fighting and safe evacuation of vulnerable residents. This is not predictable and the timing to reach/drop to safer levels that enable both fire- fighting and evacuation will vary based on fire intensity, the FDI on the day and local topography and environmental factors.
16. In major Bushfires such as occurred in 1994 and 2001/2002, the emergency services may be fully stretched to operational capacity and fire and emergency management may not always be possible in a timely manner and possibly not at all. It is highly probable that the first casualty in a wildfire will be electricity, making the use of lifts and clear lighting normally available for the physically immobile and incapacitated, impossible. The risk associated with high rise buildings for occupants' egress are magnified in SFPP developments where decreased visibility, choking smoke, increased stress levels and lack of mobility could seriously affect the elderly located on the higher floors of the building.
17. The parking arrangements for residents, visitors and employees with up to 389 car spaces in the Inner Protection Area would appear to contradict common sense management of the IPA which should not encourage on site exposure to possibly flammable material as a source which might contribute to greater fire hazard, direct flame impingement, embers and thick choking toxic smoke to hamper both fire- fighting and emergency services and complicate safe evacuation of a less than mobile, possibly confused and highly stressed population into a clogged single road where unpredictable delays may prove to be life threatening.
18. The lead-notification-time-of an approaching Wildfire is not guaranteed, not always available, it may be significantly reduced or not available at all, therefore not permit a controlled orderly pre-evacuation of the elderly population.
19. The consent authority is being asked to rezone the Lourdes Retirement Village to an increased higher density without provision enabling assessment of the vital details of the design, engineering, construction standards or potential future **sub-division** plans, these being neither possible nor publicly available for professional scrutiny and assessment but proposed to be presented in detail at later separate DA and sub-division stage after rezoning to the increased density has been achieved. These details should be transparent and upfront in order to judge how they impact on relevant safety aspects effecting fire-fighting and evacuation prospects.
20. The rezoning Proposal as advertised is being sought **solely for the re- construction of an existing Retirement Village as one site**, not for any future possibility that undisclosed newly subdivided land may be privately developed with increased density capacity, with possibly increased heights up to 22 metres, and with the increased density rezoning already confirmed and in place.
21. A medium density zoning [which would be less likely to acquire high rise under its own merit] given the fairly isolated remote site surrounded by low density residential development in a mapped, certified and gazetted bushfire hazard area with obvious recorded environmental constraints pertaining to extreme slopes, the presence on adjoining council managed bushland of several identified threatened species protected ecological communities and the unacceptable consequences which may arise from land clearance and erosion due to the local geological soil scape identified by the Sydney Geological Map 1 in 100,000 as Hawkesbury Sandstone, well recorded for its propensity to high erosion and mass movement.
22. The siting for intensified development and increased density in bushfire prone areas should avoid ridge tops and narrow crests atop narrow gullies which act as suction mechanisms,

drawing fire upwards at considerable speed, fire taking to the canopy on the effective slope of 23.7 degrees, crowning complicating fire management for the site. All down slopes are either 18 degrees or steeper. When applying the above traditional bushfire principle, a site where the increased density precludes any application of a full APZ within the SFPP site itself, should possibly be considered for refusal. Simply removing the siting constraints from a current PfBP manual will not alter the basic, unpredictable behaviour of wildfire on the ground or fire's predictable impact on development in these situations.

23. Lourdes Retirement Village is further constrained for proposed increases in density by the enhanced evacuation risks posed by its location in a mapped certified and gazetted area of High Bushfire Hazard, with a broad front interfacing Category 1 vegetation on considerable slopes out of bushland with only a single road servicing both access for emergency vehicles and egress of the existing surrounding residents in addition to the retirement village community, evacuating the area if fire impacts. Increasing the current vulnerable population and numbers of service employees, together with the projected vehicle increase in this area ignores the reality of the characteristics of fire behaviour, heavy ember attack, reduced to nil visibility, strong fire generated wind, thick choking smoke, increased dangerous heat effects on a population prone to increased medical incident and sheer logistical overload of the single sole egress causing significant delays in life threatening conditions. One must always plan for worst case scenarios ... in order to avoid one!
24. The climate is changing. In the past decade Australia has experienced increased levels of bushfire frequency, unpredictability, and longer lasting and intense fire seasons in Australia. Climate change has not been considered in the bushfire risk analyses.
25. Establishing development in bushfire prone areas can adversely affect the retention of native vegetation through clearing associated with the creation of Asset Protection Zones (APZ). The loss of vegetation or habitat on bushland adjacent the subject site is not acceptable and causes conflict with landscape and environmental objectives. The bushland on the boundary of the southern section of the subject site and adjacent bushland is identified as Biodiversity value.
26. The proposal suggests a refuge in a building to accommodate residents in case evacuation is not possible. Refuges offer the appeal of not needing to move to another location but are criticised for potentially creating a false sense of security relying on the integrity of the main building.
27. The Proposal includes the construction of 31 new independent townhouse buildings (to incorporate a total of 63 medium density residential townhouses) for 'non seniors' on the bushland interface to protect the retirement village from radiant heat. Resolving to increase density and expose people to bushfire risk to accommodate the proponent's plans is not in the public interest.
28. FOKE does not object to upgrading of buildings to fully meet contemporary bushfire protection measures under Australian Standard AS3959-2009 *Construction of buildings in bushfire-prone areas* (AS 3959). The proponent has not presented any evidence to prove this is not viable under Ku-ring-gai Council current zoning and planning controls.

## **IMPACTS ON STREETSCAPE, CONSERVATION AREAS, HERITAGE AND VIEWS FROM ADJACENT PROPERTY**

Contrary to the proponent's claims, the resulting height and bulk of buildings will dominate the site, negatively impact on the streetscape and the character of the area, adjoining bushland, and the views and vistas from surrounding streets (Nelson Road, Eastern Arterial Road, Stanhope Road, Monash Avenue) and bushland reserves (Seven Little Australian Reserve)

Due to the ridge top location of the high-rise buildings, they will impact on the Heritage Items and Conservation Areas Identified in the LEP 2015 (i.e. Seven Little Australians Park Tryon Road, East Killara, Swain Gardens 77-77A Stanhope Road, Killara and Crown Blocks Conservation Area C22).

The site is designated high bushfire prone, as such under the 10/50 rule residents will be able to remove vegetation on site. This, in addition to the APZ zones where canopy trees and /or undergrowth will be removed will result in:

- less screening of the built forms and greater visual impact on surrounding areas.
- loss of bushland that contribute to habitat and the untouched vistas of bushland viewed by the public.

FOKE supports the heritage listing of Headfort House and its retention.

Stockland's Heritage consultants GML Heritage assessed Headfort House to have cultural heritage significance based on 3 criteria being - Historical significance, Historical association and Social significance and therefore meets the test for local heritage listing.

The PP does not consistently acknowledge the sites partial inclusion within the C22 Crown Blocks Heritage Conservation Area (HCA). Lourdes Retirement Village is adjacent to the Seven Little Australians Park Heritage Item to its south and east and is in the vicinity of the heritage listed Swain Gardens and the Lindfield Soldiers Memorial Park to the east. The proposal will enable buildings up to 7 stories on the ridgeline, the highest point on the site. This will directly impact the district views to the site and for the setting of the bushland and Swain Garden Heritage Items.

## **STRATEGIC PLANNING**

The Planning Proposal (PP) is inconsistent with the Greater Sydney Region Plan, North District Plan, Ku-ring-gai LEP 2015 and Ku-ring-gai housing Strategy. It has no strategic merit.

### **1. Greater Sydney Region Plan.**

- **Objective 13 'Environmental heritage is identified, conserved and enhanced'**. The proposal does not consider the visual impact of the proposal on the heritage listed Turner Park and surrounding Conservation area. As the site is on a ridge line visible from as far as Tryon Road Lindfield, Eastern Arterial Road Killara and surrounding areas, the proposed number of buildings, their heights and bulk added to the extent of reduction of vegetation to satisfy APZ zones will result in an unacceptable visual impact on surrounding heritage items.
- **Objective 37 'Exposure to natural and urban hazards is reduced'** - this is correct for the new buildings if they are designed and built to satisfy construction requirements for high bushfire prone areas. However, this cannot be considered in isolation. The proposal results in such a significant intensification of housing and number of inhabitants, particularly for vulnerable people, it poses an unacceptable risk to human life and material loss.

### **2. North District Plan**

- **Planning Priority N16 'Protecting and enhancing bushland and biodiversity'**.  
Due to the removal of trees on site and the removal of canopy trees and undergrowth to satisfy APZ requirements, the proposal makes no positive contribution to protecting or enhancing bushland and biodiversity.
- **Planning Priority N19 'Increasing urban tree canopy cover and delivering greengrid connections'**.

The PP's ecological assessment and the Gateway Determination Report indicates that the site does not contain threatened ecological communities. This is incorrect. The area is mapped by the NSW Office of Environment and Heritage as Sydney Turpentine Ironbark

Forest which is listed as an Endangered Ecological Community under the Biodiversity Conservation Act 2016 and Coastal Shale – Sandstone Forest, a community listed as 92% cleared.

The PP does not address onsite vegetation that is not proposed to be removed, including indigenous trees which are local to the surrounding vegetation communities and significant vegetation along Stanhope Road.

### **3. Ku-ring-gai LEP 2015.**

- The proposal does not satisfy the following aims of the LEP:
  - (a) to guide the future development of land and the management of environmental, social, economic, heritage and cultural resources within Ku-ring-gai,
  - (b) to protect, enhance and sustainably manage the biodiversity, natural ecosystems, scenic values, water resources and ecological processes within the catchments of Ku-ring-gai for the benefit of current and future generations,
  - (e) to manage risks to the community and the environment in areas subject to natural hazards and risks,
- The Ku-ring-gai LEP 2015 identifies areas within the LGA that are a key focus for change (or projected change). These areas are designated to be within 800m walking distance around 5 town centres concentrated on major transport lines (i.e., the railway line and for St Ives on Mona Vale Road). The PP to spot rezone does not comply with the LEP as it is not within 1.7 km from the Lindfield Town Centre and as the topography is steep and there is an absence of footpaths along Stanhope Road, it is not therefore conducive to walking or users of mobility aids.
- As the subject site is in a highly residential R2 area (not adjoining R4 development on the transport hub), it adjoins Conservation Area 22 and extensive bushland including heritage listed site, it inconsistent with the following objectives of Zone R3 Medium Density Residential:
  - To provide for the housing needs of the community within a medium density residential environment.
  - To provide a variety of housing types within a medium density residential environment.
  - To enable other land uses that provide facilities or services to meet the day to day needs of residents.
  - To provide a transition between low density residential housing and higher density forms of development.

### **4. Ku-ring-gai Local Housing Strategy**

The Ku-ring-gai Local Housing Strategy provides new housing to the year 2036 from existing capacity within Ku-ring-gai's currently planning controls.

- The Planning Proposal seeks to change the adopted LEP 2015 R2 zoning to R3 and to develop a site specific DCP. The proposed Building Heights and FSR are significantly increased from adopted council planning controls. The PP is inconsistent with the adopted housing strategy.
- The PP offers to increase the supply and type of housing. However, it is not the right type of housing in the right location relative to infrastructure and the environment. It is not strategically planned and therefore does not satisfy the Housing Strategy.

- The PP does not align with the Ku-ring-gai Housing Strategy vision “to accommodate a changing community, close to key infrastructure and aligned with the local character”, to provide homes that “consider streetscape, context and building scale” and to “ensure housing respects local character, and is compatible with heritage and Biodiversity values”,  
 (f) to recognize, protect and conserve Ku-ring-gai’s indigenous and non-indigenous cultural heritage,  
 (l) to facilitate development that complements and enhances amenity for residential uses and public spaces,  
 (o) to protect the character of low-density residential areas and the special aesthetic values of land in the Ku-ring-gai area.

## 5. Greater Sydney Region Plan – A Metropolis of Three Cities

- The PP is inconsistent with the objective of the Greater Sydney Regional Planning around the provision of housing supply.
- **Objection 10 – Greater Housing supply.**

The PP does not meet the objective in that the site is not appropriate for significant additional development as the Lourdes Retirement Village is not located near to shops, services, local amenity, and public transport.

Whilst the village will be providing an additional 73 dwelling units the additional housing is not appropriate due to being in a low density and heritage setting and with significant bushfire hazard and evacuation risk constraints.

- **Objective 13 – Environmental Heritage is identified, conserved and enhanced.**

GML Heritage Assessment recognizes that Headfort House has local heritage significance. The PP give inadequate consideration to the impacts on the heritage significance of Headfort House, its curtilage and the HCA.

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- **Objective 14 – Integrated land use and transport creates walkable and 30 minutes cities.**  
**Strategy 14.1 – Integrate land use and transport plans to deliver the 30 min city.**

The site is not well located to shops, services, local amenity and public transport. Whilst there will be a provision of an on-site small village bus, the public bus service across the road from the village does not operate on weekends and only 5 times a day during the week.

Future residents and employees will need to rely on private cars to access work, intermittent bus services, or maybe the village bus if one is provided!

- **Objective 30 – Urban tree canopy cover is increased.**

The PP will see the removal of 233 trees, 85 of which are categorised of moderate to high category trees. The PP fails to report that the Sydney Turpentine Ironbark Forest is mapped on the site and how it will be managed and protected. The PP states that 22 indigenous trees of the 233 proposed to be removed. There will be trees replanted but there is insufficient information as to the species and future canopy outcomes. With a plan that the entire site will be managed as an Inner Protection Zone, the planting of canopy



trees will be discouraged from being planted to meet the requirements of an AZP. Therefore, it is anticipated that the urban tree canopy cover will be decreased and not increased within the site.

The PP's Arborist's report assesses there are 329 trees on the site that have been identified 96 of which are not planned to be removed. However, with the significant excavation of the site for underground parking across the site it will be left to the approval of a DA and landscape plan to explain what additional tree planting will be planted and to determine just how much deep soil area there will be across the site for the planting of future canopy trees if they are planned.

- ***Objective 28 – Scenic and cultural landscapes are protected.***

The PP is inconsistent with this objective in that the proposed built form will extend above the tree canopy due to the building heights being on the highest part of the site. The scenic landscape value of the surrounding area, the Crown Blocks HCA and the Seven Little Australians Park which is a heritage item.

- ***Objective 37 – Exposure to natural and urban hazards are reduced***  
***Strategy 37.1 – Avoid locating new urban development in areas exposed to natural and urban hazards and consider option to limit the intensification of development in existing urban areas most exposed to hazards.***

The PP is inconsistent with this objective and strategy. The PP proposes to intensify the development on the site which is identified Bushfire Prone Land. The Lourdes Retirement Village houses people who are elderly and infirm and very vulnerable in the event of a bushfire.

We do not support the PP amendment to the KLEP to increase heights of buildings from 9.5 to 22.0 metres creating the effect of a more vertical village. Given the issues of the Lourdes bushland setting, heritage conservation and interface levels with the adjacent low density residential character of Killara the proposal will be an inappropriate dominant feature and result in the erosion of landscape character and be inconsistent with the residential character of the HCA and heritage items.

## **CONCLUSION**

As Senior's Living is prohibited in designated high bushfire prone areas, the proponent relies on Existing Use Rights to update the existing Lourdes Retirement Village.

The proponent has, apparently, incorporated private dwellings into the plan in the high flame zone to facilitate satisfying APZ requirements and to reduce BAL for the Retirement Aged Facility.

The resultant-built form will not complement or integrate with the adjacent HCA or heritage items and will place at risk the demolition of Heartford House which is currently under assessment for local heritage listing.

The overbearing bulk and height of the buildings over the canopy is inconsistent with the existing 2 storey residential character and future vision for the area.

The Planning Proposal does not respond to the high environmental value of the surrounding bushland, or Biodiversity impacts due to excavation, tree removal, include the Sydney Turpentine Ironbark Forest ecological community mapped on site, adjoining bushland, and threatened species identified on council's Greenweb map. The Planning Proposal is not ecologically sustainable.

The Planning Proposal does not adopt an 'all hazards' approach to land-use planning and the impacts of climate change particularly regarding the vulnerable community of residents that it will impact.

The impacts and costs of extreme weather events are expected to increase as our population grows and areas exposed to natural hazards such as Bushfire Prone Land. This Proposal does not limit exposure to the natural hazard but increases the likelihood of greater emergency management responses in the case of bushfire at the site due to population increase.

Once the controls are approved, the proponent can modify the Masterplan. The Planning Proposal has no strategic merit and unnecessarily creates intensification of development in a hazardous area with implications to life and property.

This proposal will result in the need for a higher level of response by the Emergency Services in the case of bushfire.

The Planning Proposal should be rejected as it represents a planning logistical exercise to satisfy a proponent objective to maximise development and financial gain rather than strategic planning or putting lives and material loss as a priority.

An inappropriate rezoning can set bad legal precedents and should be avoided at all costs. In fact, the government and its indecision makers have a duty to always act in the public interest. This PP is not in the public interest and should be refused.

Yours faithfully

*Kathy Cowley*

Kathy Cowley  
PRESIDENT

cc Mayor and Councillors Ku-ring-gai Council

cc The Hon. Jonathan O'Dea Member for Davidson

cc The Hon. Alister Henskens SC MP – Member for Ku-ring-gai

cc The Hon Paul Fletcher – Member for Bradfield

cc Commissioner Rob Rodgers – Rural Fire Service

cc Mr David Boverman – Rural Fire Service