

Lourdes Retirement Village, 95-97 Stanhope Rd, Killara
Objections to State Significant Development SSD-88004956

Category A: Bushfire & Emergency Evacuation (Arguments 1–15)

1) The Single-Point Bottleneck: Stanhope Road is a narrow, single-access dead end. Forcing a higher density of frail residents into a geographic cul-de-sac directly bordering high-risk bushland violates fundamental safety principles of the NSW Rural Fire Service (RFS) Planning for Bush Fire Protection guidelines.

2) Evacuation Logistics vs. Emergency Services Traffic: A single narrow corridor cannot mathematically support a mass southbound evacuation of elderly residents while simultaneously allowing large RFS fire appliances to head northbound into the zone.

3) High-Dependency Mobility Realities: Many occupants in the expanded aged care facility will have severe mobility restrictions, dementia, or require ambulance transport. Evacuating hundreds of non-ambulatory seniors via one dead-end road during an active fire is a logistical impossibility.

4) Precedent of Prior Expert Rejections: The Sydney North Planning Panel (SNPP) previously knocked back Levande's proposals specifically because the bushfire evacuation risks were unresolvable. Bypassing Council via the SSDA pathway does not change the physical danger of the site.

5) Asset Protection Zone (APZ) Encroachment: To achieve a lawful Bushfire Attack Level (BAL) rating for vulnerable seniors, the developer must clear significant native vegetation for APZs, causing permanent environmental degradation on the Garigal National Park boundary.

6) Embers Attack Vulnerability: The architectural design features extensive multi-storey roofs and balconies directly exposed to uphill ember attacks from the adjacent Garigal National Park valley.

7) The "Shelter-in-Place" Fallacy: Relying on a "shelter-in-place" emergency protocol for an expanded, high-density aged care facility in a catastrophic bushfire zone places an unacceptable liability on staff and puts vulnerable lives at risk.

8) Smoke Inhalation Hazards: Even if flames do not reach the structures, the massive increase in smoke density during a fire poses an immediate, life-threatening respiratory risk to hundreds of high-density elderly residents trapped by a single exit road.

9) Gridlock at the Stanhope/Fiddens Roads Wharf Intersection: During an emergency, the narrow escape route bottlenecks completely at the intersection of Stanhope Road and Fiddens Wharf Road, trapping the entire neighbourhood.

10) Lack of Alternative Emergency Access: The developer has failed to secure a secondary, viable emergency-only egress route through surrounding properties to alleviate the Stanhope Road choke point.

11) RFS Staging Area Deficiencies: The site layout does not provide adequate, safe turning circles or dedicated staging areas for multiple heavy fire trucks without completely blocking civilian escape routes.

12) Climate Change Escalation: Fire weather in the Ku-ring-gai area is statistically worsening. Increasing density on the urban-bushland interface ignores current NSW climate risk and adaptation planning policies.

13) Visitor and Staff Surge During Emergencies: In a bushfire threat, off-site staff and panicked family members will rush towards the facility, completely gridlocking Stanhope Road before official evacuations can even begin.

14) Overreliance on Local Volunteer Resources: The scale of evacuation required for this expanded footprint will entirely exhaust local emergency services, stripping fire protection resources away from the wider Ku-ring-gai community.

15) Failure of the SEARs Bushfire Criteria: The Environmental Impact Statement (EIS) fails to satisfy the rigorous Secretary's Environmental Assessment Requirements (SEARs) concerning absolute life safety on single-access roads.

Category B: Procedural Unfairness & Deficient Consultation (Arguments 16 – 25)
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16) Weaponised 14-Day Exhibition Window: Forcing a 14-day public exhibition period for a complex, multi-million dollar State Significant Development gives the community an entirely inadequate timeline to review hundreds of pages of technical documents.

17) Intentional Silence on Time Extensions: The Department of Planning's failure to respond to or grant formal community requests for a public exhibition extension constitutes a severe breach of procedural fairness.

18) Restricted Notification Radius: The Department limited direct mail notifications to immediate boundary neighbours, deliberately ignoring the fact that a massive construction footprint impacts traffic, safety, and infrastructure across a much wider catchment.

19) Misuse of the SSDA Pathway: Upgrading this development to a State Significant Development via repeated reappraisals is a deliberate strategy to strip Ku-ring-gai Council of its local planning authority and silence community objections.

20) Lack of Accessible Physical Documentation: By failing to provide accessible physical copies of the master plan in local libraries or community centres during a brief 14-day window, the Department has digitally excluded elderly neighbours from participating.

21) Vague and Misleading Project Summaries: Public notices downplayed the true scale, height, and density modifications of the site, preventing everyday citizens from understanding the full impact without deep technical analysis.

22) Failure to Address Prior Public Submissions: This application fails to demonstrate how it has meaningfully integrated or resolved the hundreds of public objections lodged during previous Council and SNPP reviews.

23) Inadequate First Nations Consultation: The rapid acceleration of this SSDA indicates a superficial and deficient consultation process regarding Indigenous cultural heritage on land bordering Garigal National Park.

24) Exclusion of the Broader Killara Catchment: The traffic, environmental, and emergency risks of this site affect the entire Killara peninsula, yet the broader community was given no proactive notification of the public exhibition.

25) Violation of Community Participation Plans: The abbreviated consultation framework directly violates the Department's own stated guidelines under its Community Participation Plan for major infrastructure assessments.

Category C: Environmental & Biodiversity Impacts (Arguments 26 – 37)

26) Edge Effects on Garigal National Park: The high-density footprint introduces severe "edge effects"—including weed invasion, domestic runoff, and artificial light pollution—directly into a pristine national park ecosystem.

27) Devastating Loss of Mature Canopy: The proposal requires clearing dozens of mature, hollow-bearing native trees that provide critical nesting habitats for local fauna.

28) Threat to Vulnerable Local Wildlife: Construction and ongoing high-density human activity will permanently disrupt the wildlife corridors used by threatened species, including the Powerful Owl and eastern pygmy possum.

29) Urban Heat Island Escalation: Replacing soft landscaping, soil, and native canopy with massive concrete slabs and multi-storey structures will severely worsen the local microclimate and urban heat island effect.

30) Stormwater Runoff and Valley Erosion: The massive increase in impervious surfaces will lead to toxic stormwater surges down the steep topography, causing severe soil erosion and silting of National Park waterways.

30) Light Pollution and Nocturnal Disruption: Intensive 24-hour operational lighting required for a high-density aged care facility will blind and permanently displace nocturnal wildlife along the national park boundary.

31) Acoustic Pollution in a Quiet Valley: The introduction of massive commercial HVAC systems, cooling towers, and daily delivery bays will destroy the natural acoustic sanctuary of the Garigal bushland boundary.

32) Soil Instability on Steep Slopes: Heavy excavation and earthworks on the site's steep terrain risk causing slope instability and landslip hazards that could impact lower-lying national park terrain.

33) Destruction of Local Biodiversity Corridors: This site acts as a critical stepping-stone corridor for avian and canopy-dwelling species moving through Ku-ring-gai; slicing this corridor apart isolates wildlife populations.

34) Inadequate Biodiversity Offset Strategy: The developer's reliance on purchasing distant biodiversity offsets does nothing to remedy the direct, localized ecological destruction occurring right here in Killara.

35) Encroachment on Riparian Zones: Uncontrolled runoff during the long demolition and construction phase threatens local creek lines feeding directly into the Lane Cove River catchment.

36) Siltation and Pollution Risks to National Park Flora: Construction dust and chemical residue from heavy masonry works will settle over the adjacent national park canopy, suffocating rare native flora species.

Category D: Traffic, Infrastructure & High Density (Arguments 38 – 50)

38) Gross Overdevelopment Out of Step with Local Character: Forcing a massive, high-density institutional complex into an established, low-density R2 low-density residential zone completely destroys the local leafy character of Ku-ring-gai.

39) Unrealistic Traffic Generation Modelling: The developer's traffic reports drastically underestimate the actual daily vehicle movements of shift-changing staff, nursing specialists, medical deliveries, and visiting families.

40) Inadequate On-Site Parking Provision: Under-sizing the on-site parking spaces will force staff and visitors to park illegally or overflow onto the already narrow, choked lanes of Stanhope Road.

41) Heavy Construction Vehicle Gridlock: The years-long construction timeline will see hundreds of heavy semi-trailers and concrete trucks squeezing down Stanhope Road, destroying the road surface and endangering local school children.

42) Strain on Local Water and Sewage Infrastructure: The existing local utility, water, and sewage networks are not built to absorb a sudden, high-density institutional surge of this magnitude.

43) Psychological Harm to Current Vulnerable Residents: Forcing the frail, elderly residents currently living on-site to endure years of high-impact demolition, structural drilling, and heavy dust poses an unacceptable risk to their health and well-being.

44) Visual Bulk and Scale Intrusion: The excessive height and institutional massing of the proposed multi-storey blocks will cast significant shadows and completely overlook neighbouring residential backyards.

45) Pedestrian Safety Risks on Footpath-less Roads: Stanhope Road lacks continuous, safe pedestrian footpaths. Forcing heavy construction and operational traffic onto a road shared by elderly pedestrians and local families is a major safety hazard.

46) Waste Management and Large Truck Manoeuvres: The site design relies on large, heavy waste collection vehicles executing complex, dangerous multi-point turns on narrow public roads.

47) Loss of Property Amenity and Privacy: The scale of the western and northern elevations create an oppressive visual barrier that strips surrounding residential properties of their privacy and solar access.

48) Cumbersome Delivery Bay Configurations: The proximity of commercial loading docks to nearby residential fence lines will subject neighbours to early-morning noise from reverse beepers and heavy hydraulic tailgates.

49) Unresolved Civil Construction Risks: The extensive excavation required for underground basement parking threatens to disrupt local natural water tables and destabilize adjacent residential foundations.

50) Complete Failure of the Public Interest Test: A development that ignores local bushfire risks, destroys native habitats, gridlocks a single access road, and steamrolls community consultation fails the fundamental "public interest" test required for any State Significant Development approval in NSW.