

Ms. Sylvia Chan
Principal Planner
Monash City Council
293 Springvale Road
GLEN WAVERLEY VIC 3150

Emailed to: Sylvia.Chan@monash.vic.gov.au

5 June 2026

**Re: Application to Amend Planning Permit No. TPA/47359/D
Section 72 of the Planning and Environment Act 1987
62 – 94 Jacksons Road, Mulgrave**

Dear Sylvia

We act on behalf of Ryman Healthcare (Aust) Pty Ltd, in respect of the land at 62 – 94 Jacksons Road, Mulgrave (**the subject site**).

Further to the pre-application meeting held on 2 December 2025 with Alexandra Wade and Celia Davey, our client seeks to amend Planning Permit No. TPA/47359/D (**the permit**) pursuant to Section 72 of the Planning and Environment Act 1987 (**the Act**).

The permit was issued by Council on 1 April 2020 (and most recently amended on 3 October 2024). Plans and reports required by conditions 5 (WMP), 6 (SMP), 7 (SWS), 8 (CPMP), 10 (TMP) and 13 (Stages 1 - 4 Landscape Plan) have been endorsed. Most recently, the plans were amended on 27 February 2026 via secondary consent. As Council is aware, the approved development is currently under construction, with all of the early works (including signalised intersection and shared path) and Stages 1 to 4 now completed / nearing completion. Works to relocate the Jacksons Road bus stop will be completed prior to the occupation of the final stage of the development, pursuant to Condition 39 of the permit.

This application seeks to amend the village centre buildings located centrally within the subject site as a result of a detailed design review with respect to market demand and buildability, resulting in a significantly reduced development scheme. Revisions to the village centre have also necessitated amendments to the design of some approved villa units and associated landscaping treatments in the affected areas of the site.

A detailed summary of the proposed amendments is provided below.

It is noted that Telha Clarke Architecture & Design has been engaged to undertake the detailed design review. In our view, condition 4 of the planning permit continues to be met as Telha Clarke is an architectural firm with comparable skills and expertise, with previous experience in retirement living development. Condition 4 requires:

‘As part of the ongoing consultant team, VIA Architects or an architectural firm which is acknowledged to have comparable skill and expertise to the satisfaction of the Responsible Authority must be engaged to:

- a) oversee design and construction of the development and
- b) ensure the design quality and appearance of the development is realised as shown in the endorsed plans or otherwise to the satisfaction of the Responsible Authority’.

In support of this application, we are pleased to enclose the following:

- Completed ‘Application to Amend a Planning Permit’ form
- Recently obtained Certificate of Title
- Email correspondence with Ausnet with respect to the proposed amendments to conditions 46 and 47
- Amended architectural plans prepared by Telha Clarke Architecture & Design, dated 02 June 2026
- A memorandum prepared by Traffic Group in relation to car parking and traffic matters, dated 19 March 2026
- Amended Car Park Management Plan prepared by Traffic Group, dated 19 March 2026
- Amended Waste Management Plan prepared by LID Consulting, dated 19 March 2026
- A letter prepared by Bestec in relation to the ESD initiatives, dated 27 February 2026
- Amended Landscape Plan (including Masterplan) prepared by Papworth Design, dated 03 June 2026
- Amended Stormwater Management Strategy, dated 19 March 2026
- Amended Tree Management Plan, dated 20 March 2026

We request an invoice for the application fee of \$2,147.50 be provided by Council so our client can arrange payment.

In addition to the enclosed material, we are pleased to provide the following in support of this application.

PROPOSED AMENDMENTS

As a result of ongoing market demand and feasibility review, Ryman Healthcare seeks to significantly reduce the scale of the village centre located centrally within the subject site. There are no changes proposed to the site access or villas within Stages 1 to 6 (previously Stages 1 to 4 with reference to the endorsed plans), noting that these works are either completed or close to completion.

The proposed amendments are detailed below and articulated in the amended application material. The basis for proposed amendments is addressed in the Assessment section of this letter.

AMENDED STAGING

- Amend development staging to create additional stages. The temporary village centre will be demolished once Stage 7 is completed and replaced by a temporary staff car park (refer to Dwg TP00-04).

AMENDMENTS TO VILLAGE CENTRE

- Replace Buildings A, B and C with a central communal outdoor area, 3 rows of double storey independent living apartments and single storey villa units with associated landscaping and accessways. Each apartment will have access to a secure single garage at ground level.
- Reduce scale of Building D from 5 to 3 storeys and reconfiguration of the building, including relocating the indoor communal care area at level 1 to the south and addition of a roof terrace and

communal area at level 2. The roof terrace and communal area at level 2 will be utilised by all residents.

- Reduce size of rainwater tank in the village centre from 100kL to two tanks (one 40kL tank in the main building and 30kL tank for the independent living apartments).

AMENDMENTS TO VILLAS

- Replace Villas 67, 68, 69 and 70 with a row of double storey independent living apartments. Each apartment will have access to a secure single garage at ground level.
- Amend balance of villas into ‘pairs’ for construction efficiency and consequential amendments in floor layouts. The new villas will include pergolas along the Jackson Street frontage and along the rear eastern interface.
- Inclusion of an open pergola to the rear of villa unit 22.

BUILDING DESIGN

- Amend building expression and materials / finishes as appropriate to reflect the significantly reduced scale of the village centre building and ‘pairing’ of villas along the Jacksons Road and eastern interfaces.

LANDSCAPING

- Amendment to landscaping treatments to reflect the built form proposals described above.
- Amendment to the landscaping treatments within the resident communal area located within the southern transmission easement.

TREE REMOVAL

- Removal and replacement of Trees T61, T121, T122, T123, T124, T167, T210, T211, T1331, T1332, T1335, T1336, T1358 and T1363, some of which have been recently lost to storm damage.

PARKING AND ACCESS

- Delete basement car parking and consequential adjustments to finished floor levels of the village centre buildings.
- Amendment to the car park and access layout within the transmission easement, including provision of additional car spaces to the south of the independent living apartments and Villa 79. 3 of these car spaces will have EV charging stations with relevant signage in accordance with Ausnet requirements.
- Realignment of the proposed easement to align with the access path. Its further setback from the village centre buildings assists with buildability. The existing easement has been abandoned.

DEVELOPMENT SUMMARY – COMPARISON OF AMENDED PROPOSAL AND ENDORSED PLANS

As a result of the proposed amendments, the number of retirement living units and aged care facilities has been amended. A comparison of the development summary between the amended plans and endorsed plans is provided in Table 1 below:

Table 1: Comparison of the amended proposal development summary vs endorsed plans

	Endorsed Plans	Amended Plans	Difference
Maximum Overall Building Height	Building A – RL102.9 (5 storeys)	Replaced by single level villa units	-12.07m
	Building B – RL102.9 (5 storeys)	Building B and C replaced by double storey	-7.02 to -10.22m
	Building C – RL106.1 (5 storeys)	apartments (Buildings B02, B03 and B04) – RL	-7.7m
	Building D – RL106.1 (5 storeys)	95.88 (2 storeys) Building B01 – RL 98.4 (3 storeys)	
Site Coverage	69% (51% excluding roads and car parks)	39% (excluding roads and car parks)	-12%
Site Permeability	31%	29%	-2%
Building Setbacks			
Villa Units (Jacksons Road)	Min setback 12.55m	Min setback 9.92m (to open pergola)	-2.65m
Villa Units (East)	Min setback 4.82m	Min setback 5.32m	+0.50m
Villa 22 (north)	Unchanged	Open pergola approx. 2.5m closer to boundary	-2.50m (approx.)
Retirement Village			
Villa Units	70 3 x 2 bedroom 14 x 2.5 bedroom 53 x 3 bedroom	80 19 x 2 bedroom 14 x 2.5 bedroom 47 x 3 bedroom	+10
Apartments	105 73 x 2 bedroom 32 x 3 bedroom	32 16 x 2 bedroom 16 x 3 bedroom	-73
Aged Care	60	40	-20
Assisted Living	54	0	-54
Total Communal Area	9,778m ²	10,361m ²	+583m ²
Car Parking	370	261	-109
Bicycle Parking	14	18	+4

AMENDMENTS TO PERMIT CONDITIONS

The following amendments are proposed to the permit conditions:

Condition	Proposed Amendments	Discussion
Permit Preamble	Staged development of the land for purpose of a Retirement Village and Residential Aged Care Facility (up to 5 storeys in height), alteration of access to a Transport Zone 2 and removal of native vegetation	Amend. The reference to 5 storey is no longer relevant.

1d	The two resident apartment spaces located in the south-west at-grade car park are to be reallocated as visitor spaces associated with the villa units and relocated to the Main Building basement car park to improve residential access and amenity.	Delete. This condition is no longer relevant as the basement car park has been deleted. All car parking within the at-grade car park are allocated to visitors and staff.
2	Before the development starts, excluding works detailed in any endorsed Early Works Plan amended plans to the satisfaction of the Responsible Authority must be submitted to and approved by the Responsible Authority. The plans must be drawn to scale and dimensioned. When the plans are endorsed they will then form part of the Permit. The plans must be generally in accordance with the decision plans prepared by VIA Architects, Plan no. TP0.00-TP05-06 Rev C dated 29 March 2022 Telha Clarke dated 02 June 2026 and but modified to show:	Amend. This should refer to the amended set of plans prepared by Telha Clarke.
2r	A Landscape Master Plan prepared in accordance with Condition 13a.	Refer to discussion on proposed amendments to condition 13a and 13b.
5	The provisions, recommendations and requirements of the endorsed Waste Management Plan prepared by LID Consulting dated 20 March 2022 19 March 2026 must be implemented and complied with to the satisfaction of the Responsible Authority.	Amend. This should refer to the accompanying Waste Management Plan prepared by LID Consulting.
6	The provisions, recommendations and requirements of the endorsed Sustainable Management Plan prepared by Bestec dated 17 December 2021 9 November 2022 (and accompanying addendum dated 27 February 2026) must be implemented and complied with to the satisfaction of the Responsible Authority.	Amend. This should refer to the currently endorsed Sustainable Management Plan with addendum prepared by BESTEC.
7	The provisions, recommendations and requirements of the endorsed Stormwater Management Strategy prepared by Wallbridge Adams Consulting Engineers Gilbert Aztec dated 16 December 2021 19 March 2026 must be implemented and complied with to the satisfaction of the Responsible Authority.	Amend. This should refer to the accompanying Stormwater Management Strategy prepared by Adams Consulting Engineers.
13a	Concurrent with the endorsement of any plans pursuant to condition 2, a Landscape Master Plan prepared by a Landscape Architect or a suitably qualified or experienced landscape designer, drawn to scale and dimensioned must be submitted to and approved by the Responsible Authority for every Stage of the	Amend. This should refer to the accompanying Landscape Master Plan prepared by Papworth Design. We also seek to amend this condition to separate the endorsement of the Landscape Master Plan and staged landscape plans so that the staged landscape plans are only

development (excluding the early works). When endorsed, the plan will form part of the Permit. The Landscape Master Plan must be generally in accordance with the Landscape Masterplan and Level 1 Activity Areas Plan prepared by Papworth Design Pty Ltd dated 21 March 2022 **19 March 2026**, except that the plan must show...”
<delete balance of the condition and insert into proposed condition 13b>

required prior to the commencement of construction for each stage. We submit that this is a more practical approach given the level of detail required for the staged landscape plan. We note that Council has previously endorsed plans without staged landscape plans, so the proposed condition better reflects how the consideration and endorsement of landscape material has historically been managed.

- 13b** **Prior to the commencement of construction of each stage, a landscape plan for the stage must be prepared by a Landscape Architect or a suitably qualified or experienced landscape designer, drawn to scale and dimensioned must be submitted to and approved by the Responsible Authority (excluding early works). When endorsed, the plan will form part of the Permit. The Landscape Plan for each stage must be generally in accordance with the Landscape Masterplan prepared by Papworth Design Pty Ltd dated 19 March 2026, except that the plan must show:**
- a) The changes required by Condition 2 of this permit.**
 - b) Provision for a gate and pathway showing rear access to Gladeswood Reserve**
 - c) Further details of pavement materials / finishes.**
 - d) Deletion of reference to boundary fencing materials.**
 - e) Full details of all soft and hard landscaping including soil depth for planting above the basement areas.**
 - f) Existing Trees 170, 171 and 172 removed and replaced with a minimum of three (3) fir trees**
 - g) Schedule of all proposed trees, shrubs, creepers and ground cover, which will include the size of all plants (at planting and at maturity), their location, botanical names and the location of all areas to be covered by grass, lawn, mulch or other surface material.**
 - h) Provision of appropriate species suited to low water use and low ongoing maintenance.**
 - i) Detail of growing medium, irrigation and drainage of planter boxes and**

New condition. This condition captures the requirements of the staged landscape plan, noting that Condition 26 continues to require that landscape treatments be carried out in accordance with design detail endorsed under this condition.

planting
within confined spaces; and
j) The extent of any cut, fill, embankments
or retaining walls associated with the
landscape treatment of the site.

19	No less than 367 car spaces must be provided on the land to the satisfaction of the Responsible Authority prior to the occupation of the last stage of the development.	Delete. This condition is unnecessary as the scale of the development has significantly reduced, as well as the statutory car parking requirement under Amendment VC277. Only 122 car spaces are now required under Clause 52.06, and 261 car spaces will be provided throughout the subject site. The condition is also unnecessary as car parking for each stage must be delivered as per the endorsed plans before the occupancy permit can be issued for that stage.
46	No part of the proposed buildings, including eaves, awnings, canopies, shelters and the like, is permitted on AusNet Transmission groups' easement. This excludes removable umbrella shades up to 3 metres in height.	Amend. Please refer to the accompanying email correspondence with Ausnet. In-ground umbrella shades are proposed within the easement to provide shading to the outdoor recreational areas. The proposed amendment provides clarity that these are acceptable.
47	The proposed car park must be used only by domestic and small commercial vehicles not exceeding 3 3.5 metres in height. Parking, loading, unloading and load adjustment of large commercial vehicles is not permitted on the easement, with the exception of waste management activities.	Amend. Please refer to the accompanying email correspondence with Ausnet. Delivery vehicles up to 3.4 metres in height are proposed to load / unload within the easement (directly adjacent to the proposed loading bay). The proposed amendment allows for this to occur and provides clarity around exemptions for waste management activities.

SUBJECT SITE AND SURROUNDS

The site has a total area of approximately 4.6 ha and is rectangular in shape with a 230-metre frontage to Jacksons Road and a depth of approximately 205 metres. The site is formally described as Lot 1 on Plan of Subdivision 642278 and contains the following easements:

- A 36.58 metres wide transmission of electricity easement (E-1 and E-4) along the southern boundary.
- A 3 metres wide drainage and sewerage easement (E-2) in the north-eastern corner.
- A 1.5 metres wide transmission of electricity easement (E-3) north of Easement-1.
- A 2.5 metres wide footpath easement (E-5) along part of the western boundary.

The subject site is also affected by a Section 173 Agreement (Instrument AY412744W). The Agreement was required by condition 15 of the permit and sets out that the independent living villa and units must only be used for the purpose of a retirement village in accordance with the Retirement Villages Act 1986. The proposed amendments do not have any bearing on the Agreement.

As demonstrated in Figure 1, the approved development is currently under construction, noting that the early works as well as Stages 1 to 4 have now been delivered.



Figure 1: Aerial Photograph of the Subject Site and Surrounds dated 4 Oct 2025 (Source: Nearmap)

PLANNING CONTROLS AND POLICIES

ZONING

The subject site continues to be located in a Neighbourhood Residential Zone – Schedule 4 ‘Dandenong Valley Escarpment Areas’ (**NRZ4**) pursuant to Clause 32.09 of the Scheme (refer to Figure 2). The proposed amendments do not trigger any additional permit requirements under the zone.

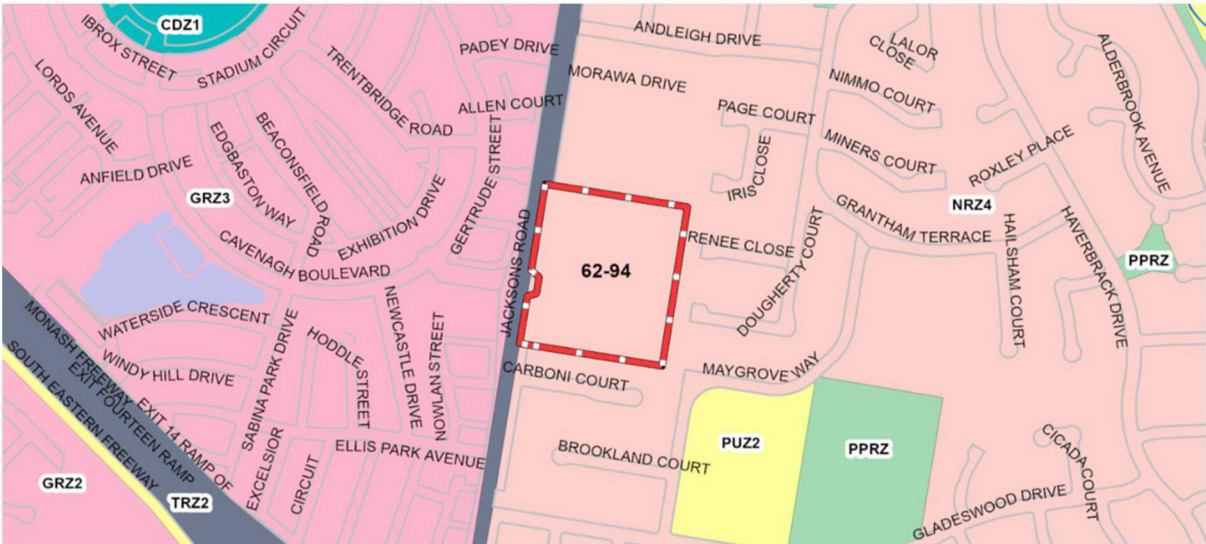


Figure 2: Zoning Map

OVERLAYS

The subject site is not affected by any overlays.

PARTICULAR PROVISIONS

The following Particular Provisions are of relevance to this amendment:

- Clause 52.06 – Car Parking seeks to ensure the provision of an appropriate number of car parking spaces having regard to the demand likely to be generated, the activities on the land and the nature of the locality. It is noted that Clause 52.06 was amended via Planning Scheme Amendment VC277 on 18 December 2025 which reduced the minimum car parking provision. The subject site is located within Category 2, which sets out the following minimum requirements:

Use	Rate	Statutory Requirement	Provision
Residential Aged Care Facility	0.25 to each bedroom	10	22
Retirement Village	1 to each dwelling	112	239
Total		122	261

The amended proposal will provide car parking in excess of the statutory requirement.

- Clause 52.17 – Native Vegetation seeks to ensure that there is no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation. The same extent of native vegetation is proposed to be removed under the amended scheme as the approved scheme.
- Clause 52.29 – Land adjacent to the Principal Road Network seeks to ensure appropriate access to the Principal Road Network. No physical changes are proposed to the access from Jacksons Road, noting that the signalised intersection has now been delivered.
- Clause 53.17 – Residential Aged Care Facility seeks to facilitate the development of well-designed residential aged care facilities to meet existing and future needs. This Clause sets out guidelines for the development of residential aged care facilities as well as a mandatory building height of 16

metres within the Neighbourhood Residential Zone. The residential aged care building will have a height of 10.62 metres.

- Clause 53.18 – Stormwater in Urban Development seeks to ensure that stormwater in urban development, including retention and reuse, is managed to mitigate the impacts of stormwater on the environment. The amended proposal will continue to achieve best practice, as demonstrated in the accompanying letter prepared by BESTEC.

Transitional Provisions

The application benefits from transitional provisions under Clause 52.37-9 (Canopy Trees) and Clause 53.03-5 (Residential Reticulated Gas Service Connection as the planning permit was granted before the approval dated of Amendment VC289 (15 September 2025) and Amendment VC250 (1 January 2024), respectively.

PLANNING POLICY FRAMEWORK

The following Planning Policy Framework clauses are relevant to this amendment:

- Clause 11.01-1S – Settlement seeks to facilitate the sustainable growth and development of Victoria and deliver choice and opportunity for all Victorians through a network of settlements.
- Clause 15.01-1S - Urban Design seeks to create urban environments that are safe, healthy, functional and enjoyable and that contribute to a sense of place and cultural identity.
- Clause 15.01-1R – Urban Design – Metropolitan Melbourne seeks to create a distinctive and liveable city with quality design and amenity.
- Clause 15.01-2S – Building Design seeks to achieve building design and siting outcomes that contribute positively to the local context, enhance the public realm and support environmentally sustainable development.
- Clause 15.01-2L-02 – Environmentally Sustainable Development seeks to achieve best practice in environmentally sustainable development from the design stage through to construction and operation.
- Clause 15.01-4S – Healthy Neighbourhoods seeks to achieve neighbourhoods that foster healthy and active living and community wellbeing
- Clause 15.01-5L - Monash Preferred Neighbourhood Character seeks to:
 - To build upon the important contribution that landscaping makes to the garden city character of Monash, and preserve and enhance the treed character.
 - To protect and enhance the special character of the heritage precincts, the creek environs and the Dandenong Valley Escarpment.
- Clause 16.01-1L-01 – Housing Supply – Monash includes the strategy to increase the provision of social housing and housing that meets special needs including housing for older people.
- Clause 16.01-5S – Residential aged care facilities seeks to facilitate the development of well-designed and appropriately located residential aged care facilities.



ASSESSMENT

The proposed amendments are predominantly confined to the main village centre which is centrally located within the subject site. As such, the proposed amendments will have limited implications on the Jacksons Road streetscape and adjoining residential properties. Minor changes are proposed to villa units 1,2, 3 and 80 which front Jacksons Road and villa units 30, 31, 60-63 and 75-79 along the eastern boundary. Amended landscape treatments are also proposed, including replacement planting for trees that have been removed due to storm damage and other circumstances.

Having regard to the Scheme, the proposed amendments are considered to be acceptable for the following reasons:

BUILDING MASSING AND PRESENTATION

- The overall building massing of the amended village centre is significantly reduced, noting:
 - Buildings A, B and C (5 storeys) will be replaced by 3 rows of double storey independent living apartments (Buildings B02, B03 and B4), communal outdoor space and single storey villa units. Building D is also reduced in scale from 5 to 3 storeys.
 - The only increase in scale proposed is the replacement of Villas 67 to 70 (single storey) with a row of double storey apartments (Building B05). However, this product is set back approximately 42 metres from Jacksons Road, behind a row of villa units.
- In relation to amendments to villa units:
 - The amended villas along Jacksons Road (Villas 1, 2, 3 and 80) and associated pergolas will extend beyond the current approved front setback by approximately 0.5 and 1.7 metres for any given unit. We consider the reduction in setback to be acceptable given that these villas (including pergolas) will continue to be set back at least 11 metres from the Jacksons Road title boundary, and exceeds the 5 metres setback of the constructed villas to the north. Also, the reduced setback apply to open pergola structures which have a very modest visual import.
 - The amended villas along the eastern boundary continue to be single storey in height, albeit the overall height of the villas is reduced compared to endorsed villas in this location. The ‘pairing’ of the villas allow for greater separation between the built form (2.4 metres) compared to the previously approved which comprised villa units constructed to internal boundaries. Overall, proposed villas have a marginally greater setback from the eastern boundary, further reducing potential impacts on adjoining properties.
 - Overall, site coverage is reduced to 39% (previously 69%, but 51% when calculated as a product of building footprints only) and site permeability marginally reduced 29% (previously 31%).
- The design of the buildings continues to achieve a high level of articulation through materials and finishes and building expression. Refer to Figure 3 below.





Figure 3: 3D render of the amended proposal viewed from the Jacksons Road entrance (Source: Telha Clarke)

- The amended materials and finishes continues to be drawn from a neutral palette comprising brickwork, timber finish, precast, render, metal cladding and glazing.

OFF-SITE AMENITY IMPACTS

- The proposed amendments will have reduced off-site amenity impacts on adjoining residential properties given the significant reduction in scale of the village centre building and reduction in heights and siting of villas along the eastern property boundary.
- The shadow diagrams (TP70-01 to TP70-02) demonstrate that the amended buildings will not have any shadow impacts on adjoining residential properties. Refer to the excerpts below in Figure 4.

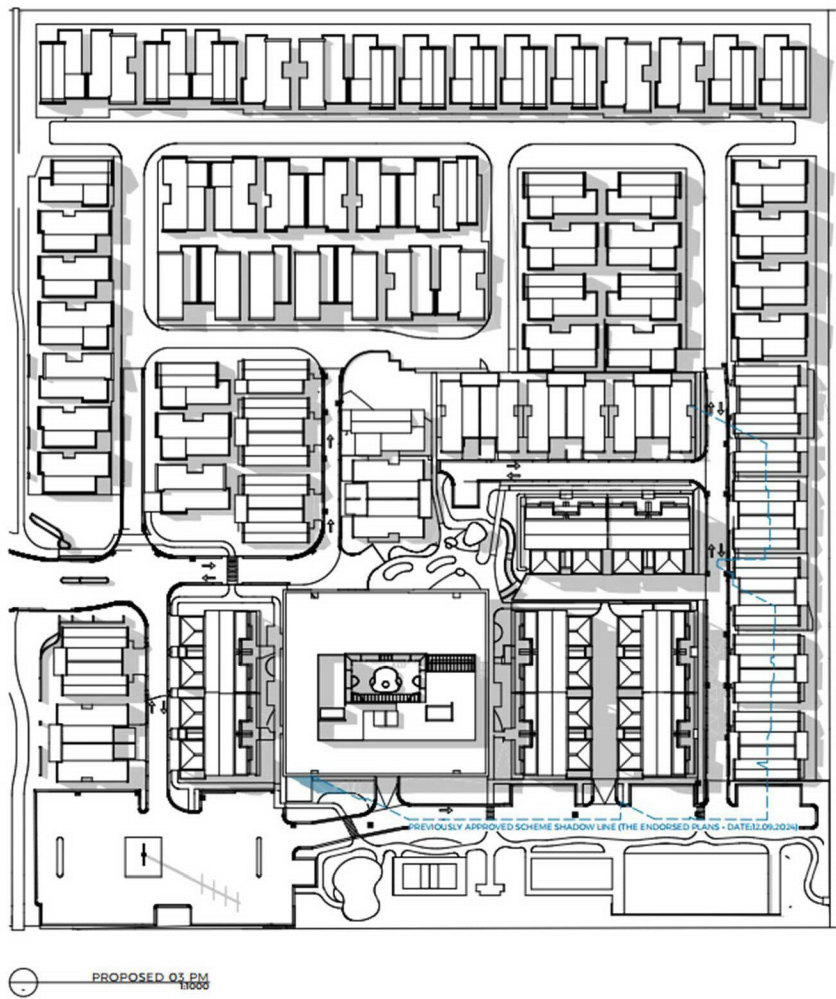


Figure 4: Shadow impact of the amended development at 22 September, 3PM (Source: Telha Clarke)

- Any overlooking from the amended buildings is considered to be reasonable given the significant distance of higher built form from adjoining residential properties. The proposed apartments are at least 32.9 metres from the eastern boundary and 120 metres from the northern boundary. Overlooking impacts from the amended single storey villas along the eastern boundary will continue to be mitigated by 1.7 metres high privacy screening with a maximum transparency of 25%. Refer to TP91-12.
- Clause 53.17 (Residential Aged Care Facility) only applies to the central 3 storey building, as it is the only building containing residential aged care units, with all other buildings to be used as a retirement village. This building will continue to meet the requirements of the Clause.

ON-SITE AMENITY

- Although Clause 58 does not technically apply to retirement village developments, the requirements of Clause 58.05 (On-Site Amenity and Facilities) and 58.07 (Internal Amenity) can be used as a guide for the assessment of internal amenity of the proposed apartments. All of the apartments meet the objective of the standards set out under 58.05 and 58.07, and provides a higher degree of compliance relative to the current set of the endorsed plans on account of the reduction in scale and massing of the development.

- Each retirement village apartment will continue to be provided with a functional open plan kitchen / dining / living area with a balcony or courtyard. All bedrooms and living areas will meet the minimum dimensions of Standard D26 (functional layout).
- Each apartment will be provided with a generous balcony or courtyard area of at least 21 square metres. Balconies and courtyards have been oriented to maximise northern solar access. None of the apartments or villas have a primary southern outlook.
- All habitable rooms have a window in an external wall of the building.
- The provision of internal communal area has reduced from 2,128 square metres to 1,479 square metres, as a result of the replacement of Buildings A, B and C with a smaller village centre (Building B01). We submit that the previous internal communal open space was over provided. The reduced provision is comparable to the communal open space delivered in other Ryman aged care developments in Victoria, including at the Nellie Melba facility (1,800 square metres) and Charles Brownlow facility (1,235 square metres), and is proportional to the reduced scheme. It is noted that the overall external shared landscaped area is increased as a result of the reduction in building footprint.

TREE IMPACTS AND REMOVAL

- Trees T61, T121, T122, T123, T124, T167, T210, T211, T1331, T1332, T1335, T1336, T1358 and T1363 have been removed as they have failed in storm events or their structure has been significantly impacted, necessitating removal. Trees that have failed or experienced storm damage have been downgraded by the project arborist to low or medium retention value based on a site assessment undertaken on 10 December 2025. The Tree Management Plan has been updated accordingly.
- The removed trees will be replaced by proposed new canopy tree planting, as shown in the accompanying Landscape Master Plan.
- The location of the proposed pergolas have been reviewed by the project arborist. Pruning is recommended to Trees 115 and 1357 to account for above ground encroachment of the pergolas on pages 20 and 21 of the accompanying Tree Management Plan. The Tree Management Plan also includes specifications for working within the TPZ.

CAR PARKING AND TRAFFIC

- The amended basement layout, car parking provision and vehicular access have been reviewed by TraffixGroup. Their assessment confirms that the accessways, car parking spaces, gradients and waste collection / loading is acceptable. Please refer to the accompanying letter prepared by TraffixGroup for further detail.
- The provision of 261 car parking spaces exceeds the statutory parking requirements of Clause 52.06.
- There is no statutory requirement for bicycle parking for the use of retirement village and residential aged care facility. Nevertheless, 18 bicycle parking spaces will be provided.

ESD

- The amended proposal will continue to deliver the environmentally sustainable design initiatives as previously proposed, with the exception of a reduction in the rainwater tank capacity in the village centre from a total of 100kL to 70kL. The MUSIC modelling undertaken by BESTEC in the accompanying letter confirms that the reduced capacity of 70kL will continue to meet best practice requirements.



For the above reasons, the proposed amendments achieve the acceptable planning outcomes required by Clause 65 of the Scheme.

RESPONSE TO PRE-APPLICATION COMMENTS

The project team have considered and addressed Council's pre-application feedback provided on 15 December 2025. Notably:

- The extent of landscaping has been maximised, where possible. The proposed site coverage is significantly reduced by approximately 12% and site permeability increased from 31% to 29%.
- A north-south pedestrian pathway has been provided between Villas 37 and 74 to provide a link from the northern portion of the subject site to the central outdoor area.
- The separation between the villa pairs have been increased from approximately 1.2 metres to 2.4 metres. This provides a comparable separation between villa units relative to the approved arrangement.
- 3 x parallel visitor car parking spaces will continue to be provided centrally.
- The proposed internal accessways, including the porte cochere, have been reviewed by the project traffic engineers and found to be functional.

CONCLUSION

We trust this submission and the enclosed material will enable Council to assess and determine this amendment application.

Should you have any questions, please do not hesitate to contact me on 8648 3500.

Yours sincerely



Adam Haines
Associate Director
ahaines@upco.com.au
encl