



KEYLAN
consulting pty ltd

Suite 2, Level 1
1 Rialto Lane
Manly NSW 2095

Statement of Environmental Effects

Seniors Living and Mixed Use Development
5 Skyline Place, Frenchs Forest



Prepared for Platino Properties Pty Ltd

Submitted to Northern Beaches Council

February 2021



Suite 2, Level 1
 1 Rialto Lane
 Manly NSW 2095
 ABN 51 45 22 11 892
 ACN 613 590 775

This report has been prepared by:

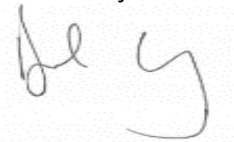


Sammy Hamilton ^{BP}
 Planner
 E: sammy@keylan.com.au



Rebecka Groth ^{BURP}
 Principal Planner
 E: rebecka@keylan.com.au

This report has been reviewed by:



Dan Keary ^{BSC MURP MPIA}
 Director
 E: dan@keylan.com.au

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Table of Contents

1	Introduction	15
1.1	Report Structure	16
1.2	Consent authority	17
1.3	Integrated development.....	17
1.4	Consultation with Council.....	17
1.4.1	Pre-lodgement meeting with Council.....	17
1.4.2	DSAP meeting	24
2	The site and locality	28
2.1	Site description.....	28
2.2	Surrounding locality.....	28
2.3	Site History.....	31
2.3.1	Development Application 2018/0995.....	31
2.3.2	Modification 2019/0654.....	31
3	The Proposal	32
3.1	Project description.....	32
3.1.1	Housing typologies.....	34
	Seniors Housing units	35
	Affordable housing for seniors.....	35
	Disability housing.....	35
3.1.2	Stratum subdivision.....	36
3.1.3	Communal Uses.....	36
3.1.4	Landscaping and Open Space	37
3.1.5	Affordable and Disability Housing.....	38
3.1.6	Non-seniors/affordable/disability housing Uses	39
3.1.7	Access, Car parking and Movement Network	40
3.2	Project Need	40
4	Strategic Planning Context	42
4.1	Greater Sydney Region Plan	42
4.2	North District Plan	44
4.3	Northern Beaches Local Strategic Planning Statement.....	46
4.4	Draft Northern Beaches Housing Strategy.....	46
4.5	Northern Beaches Hospital Precinct Structure Plan	47
5	Statutory Planning Framework	48
5.1	Environmental Planning and Assessment Act 1979	48
	Section 1.3 – Objects	48
	Section 4.15(1) Matters for consideration.....	49
	Section 4.17(1)	50
5.2	Rural Fires Act 1997	50
5.3	State Environmental Planning Policies.....	51
5.3.1	State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	52
5.3.2	State Environmental Planning Policy No.55 – Remediation of Land	54
5.3.3	State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development.....	54
5.3.4	State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 ..	55
5.3.5	State Environmental Planning Policy No. 19 – Bushland in Urban Areas.....	55
5.3.6	Draft Remediation of Land State Environmental Planning Policy.....	55
5.3.7	Draft Housing Diversity State Environmental Planning Policy.....	56
5.4	Warringah Local Environmental Plan 2011.....	56

5.4.1	Zoning.....	56
5.4.2	Floor Space Ratio (FSR).....	58
5.4.3	Height	58
5.4.4	Other matters.....	58
5.5	Warringah Development Control Plan 2011.....	59
5.6	Voluntary Planning Agreements.....	59
5.7	Environmental Planning and Assessment Regulations 2000	60
6	Environmental Planning Assessment	61
6.1	Built Form	61
	Design Principles	61
	Siting and massing study	61
	Overview of proposal	62
	Height	63
	Visual Impacts.....	66
	Overshadowing and Solar Access	66
	ADG Compliance	67
6.2	Open Space, Public Domain and Landscaping.....	67
6.3	Traffic and Transport	68
6.4	Noise and Vibration	70
	External Noise Intrusion.....	70
	Operational Noise Emissions	71
6.5	Waste Management	71
6.6	Stormwater Management	71
6.7	Economic and Socio-economic.....	72
6.7.1	Economic benefits	72
	During construction	72
	Post-construction	72
6.7.2	Housing supply and choice	73
	Draft Northern Beaches Housing Strategy.....	73
	Gap Assessment	73
	Job Creation	74
	Other Considerations.....	74
6.7.3	Social benefits	74
	Innovation in housing.....	74
	Demand.....	75
6.8	Crime Prevention Through Environmental Design.....	75
6.9	Environmental Sustainability	76
6.10	Construction Management	77
6.11	Development Contributions	77
6.12	Building Code of Australia (BCA).....	77
6.13	Suitability of the site	78
6.14	Submissions.....	78
6.15	Public interest.....	78
7	Conclusion	80

Figures

Figure 1: Site location (Source: PA Studio Architects).....	28
Figure 2: Site context, including built form (Source: PA Studio Architects).....	29
Figure 3: Site in relation to surrounding built form (Source: PA Architect Studios).....	30
Figure 4: Indicative photomontage of proposal with approved development on Lot 2 in foreground (Source: PA Architect Studios)	33
Figure 5: Proposed ground level uses (Source: PA Architect Studios)	33
Figure 6: Photomontage of indicative swimming pool area (Source: PA Architect Studios)	37
Figure 7: Photomontage of indicative lounge area on ground level (Source: PA Architect Studios) ...	37
Figure 8: Photomontage of indicative piazza showing children's play area and community gardens (Source: PA Architect Studios)	38
Figure 9: Extent of bushfire prone land at subject site (Source: Building Code and Bushfire Hazard Solutions)	51
Figure 10: Zoning excerpt with site outlined in dashed blue (Source: WLEP 2011)	57
Figure 11: Proposed massing and siting strategy (Source: PA Architect Studios).....	62
Figure 12: Surrounding development approvals within Frenchs Forest (Base source: Sixmaps)	63
Figure 13: Emerging built form context (Source: PA Studio).....	64
Figure 14: Height Assessment – surrounding approved built form (Source: PA Studio)	64
Figure 15: Indicative photomontage from Frenchs Forest Road (Source: PA Studio).....	65
Figure 16: View of proposed development as seen on Bimbadeen Crescent, residential area north of Frenchs Forest Road (Source: PA Architect Studios).....	66

Tables

Table 1: SEE Report Structure	16
Table 2: List of Appendices.....	17
Table 3: Summary and response to pre-lodgement comments	24
Table 4: Response to DSAP pre-lodgement comments	27
Table 5: Proposal Overview.....	32
Table 6: Overview of proposed stratum subdivision lots	36
Table 7: Assessment against Objectives of the EP&A Act.....	49
Table 8: Section 4.15(1) assessment.....	50
Table 9: Assessment of subject site against Seniors SEPP Clause 4(6).....	53
Table 10: Assessment of subject site against Seniors SEPP Schedule 1.....	53
Table 11: Other matters in the WLEP 2011	59
Table 12: Projected future traffic generation	68
Table 13: Projected net reduction in peak hour traffic generation potential	68
Table 14: Summarised maximum internal noise criteria (Source: Acoustic Logic)	70
Table 15: Summarised traffic noise levels (Source: Acoustic Logic).....	70
Table 16: Consideration of the proposal against ESD principles	77

Appendices

Appendix 1	Architectural Plans
Appendix 2	Supplementary Architectural Plans not requiring approval
Appendix 3	Design Report & Verification Statement
Appendix 4	Landscape Design & Plans
Appendix 5	Economic Assessment Report
Appendix 6	Seniors Housing Demand Analysis
Appendix 7	Social Impact Report
Appendix 8	Letters of Support and Endorsement
Appendix 9	Traffic Report
Appendix 10	Acoustic Report
Appendix 11	Bushfire Report
Appendix 12	Access Report
Appendix 13	BCA Compliance Report
Appendix 14	Waste Management Report

Appendix 15	Sustainability Report
Appendix 16	Arborist Report
Appendix 17	Detailed Site Investigation
Appendix 18	Geotechnical Report
Appendix 19	Civil & Stormwater
Appendix 20	Construction Management Plan
Appendix 21	BASIX and NatHers Report
Appendix 22	<i>State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 and Seniors Living Policy Assessment</i>
Appendix 23	Warringah Development Control Plan 2011 Assessment
Appendix 24	Operational Management Plan

Executive Summary

This Statement of Environmental Effects (SEE) has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Platino Properties Pty Ltd* (the Applicant) to accompany a development application (DA) for the construction of a mixed-use development including seniors housing and commercial premises at 5 Skyline Place, Frenchs Forest.

This SEE has been prepared and is submitted to Northern Beaches Council pursuant to the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The site and locality

The proposed development site is located at 5 Skyline Place, Frenchs Forest. Approval for development, including subdivision of the site, was granted on 18 June 2019 through REV2019/0014. The proposed development is located on proposed Lot 1, which has an area of 7,811m² and is located on the southern part of the site at a distance of approximately 60 m from Frenchs Forest Road. For the purposes of this SEE, “site” refers to proposed Lot 1.

To the immediate north on proposed Lot 2 under REV2019/0014, the development of a 6 storey mixed-use building comprising, commercial, retail and seniors living uses, was approved by the Sydney North Planning Panel (SNPP) on 18 December 2018.

The Northern Beaches Hospital is situated approximately 240 m west of the site, within the broader Frenchs Forest Priority Growth Area. The character of the locality continues to undergo significant transformation with the construction of the new hospital, associated road upgrade works and a variety of new housing and employment development to support the precinct. This area has also been identified as the Frenchs Forest Health and Education Precinct by the Greater Sydney Commission in the *Greater Sydney Region Plan* and *North District Plan*. These Plans recognise the growth and evolution of health and education precincts into mixed use innovation precincts, with the clustering of compatible uses which both capitalise on and strengthen the specialist health and employment functions of these precincts. This includes the “*transition of business parks into higher amenity and vibrant mixed-use precincts, including opportunities for residential development which supports the function of the business park.*”

The proposal

The Project involves a pioneering partnerships model between the private and NFP sectors, and incorporates practical solutions from financing, business, government, community housing and philanthropy.

The proposed development aspires to build upon the approval as an innovative, leading-edge model for over-55 living providing fully-integrated housing types together: Premium quality Independent Living accommodation for Seniors, Social Housing for people living with an intellectual disability and Affordable Housing for older women (over 55) at risk of homelessness.

Frenchs Forest cannot realistically accommodate the expected quantum of additional retirement housing demand without large-scale sites being redeveloped. In this respect, the subject site presents a key opportunity for Council to assist in delivery of sustainable seniors living communities for retirement.

Specifically, the proposed development comprises:

- Demolition of the existing office/warehouse building and at grade car parking on the site
- Construction of two separate buildings, ranging in height from 3 to 12 storeys, containing:
 - 133 independent living units, including:
 - 12 affordable dwellings for seniors and
 - 10 units for disability housing to be operated by Project Independence
 - a mix of 1, 2, 2 bed + study and 3 bedroom dwellings
 - 10 units are to be operated by Project Independence and made available for disability housing
 - 941m² of commercial floorspace which may include allied health, restaurant, co-working spaces, dentistry, hospital uses, home care provision and /or day-care respite centres
 - Approximately 19,000m² overall gross floor area
- Stratum subdivision into 3 lots for disability and affordable housing, other seniors housing and commercial uses
- Height range of 3 to 12 storeys (approximately 10 to 39 metres)
- Approximately 2,188m² of communal open space (28% of the site), including a central publicly accessible piazza
- Common Facilities including a pool provided within a centrally located position between the mixed use buildings
- Central community gardens
- Basement car parking for 232 spaces, with access from the access ramp to the approved car park via Lot 2.

Proposal Highlights and Public Benefits

Strategic Planning

- Consistent with evolving character of the area as a Health and Education Precinct
- Seniors SEPP allows permissibility as previously determined

Economic Issues & Strategic Planning

- The objective of the B7 Zone is to encourage employment opportunities and accommodate employment targets set by Council's and Greater Sydney Commission.
- The Forest Business Park has an area of 56.5 hectares and the site occupies **1.2%** of this area.
- The Business Park can accommodate between 3 and 7 times the employment targets.
- As such, the Proposal would have no effect on the ability of the zone to satisfy the employment targets.
- Nevertheless, the proposal will result in a total of 79 jobs, 35 more jobs over that already provided.

Design Guidelines

The proposal greatly surpasses every minimum ADG requirement (noting that the *ADG does not apply to dwellings built under SEPP Seniors*)

- landscaping covers 42% of the site (in accordance with the ADG definition)
- deep soil Landscaping occupies 35% of the site (in accordance with the ADG definition)
- 28% of the site is provided as central communal open space (with an area of approx. 2,200 sq m)
- 83% of dwellings are cross ventilated.
- 90% of dwellings have solar access.
- most dwellings exceed the ADG minimum areas by 15% to 20%.
- most balconies exceed minimum sizes by 20%
- other more detailed requirements such as dwellings per floor and building setbacks are satisfied or exceeded.

The scale and relationship between the proposed built form and landscaped areas on the site will result in an attractive, high quality environment.

All dwellings have been designed to meet the specific requirements of seniors and will provide a high level of amenity for future residents.

Height

The design has been derived from a detailed site analysis, siting and massing study and a visual impact analysis.

The study demonstrates that the proposal results in:

- No adverse visual impacts
- No overshadowing of residential areas
- No overlooking onto residential area
- No effect on privacy or loss of views
- No overshadowing of the landscaped and common areas **within** the development is caused by building height above 6 storeys.

As the development will result in no adverse effects, it follows that the height of the proposal must be acceptable.

The proposal has been designed to be capable of subsidising the provision of the 22 proposed affordable and social housing dwellings and provide the high level of concierge health and well-being services at an affordable cost due to number of residents.

Landscaping

- 42% of the site is landscaped area (in accordance with the definition in the Warringah DCP) . This gives the opportunity to create a landscaped setting, which is large enough to accommodate a variety of active and passive uses. There are areas for sitting in groups, contemplation, walking, community gardening and playing with grand or greatgrandchildren.
- Native and some deciduous trees will provide shade-

Common Spaces

The development has been designed to encourage social interaction and on site activities

- The central “club” are accommodating eating, games and bar areas, men’s shed and arts and crafts room,
- Computer room and hot desking office area
- 25m swimming pool and gym area
- Rooftop common area
- Outdoor landscaped areas

Social Benefits

Affordable & Disability Housing

The scale of the development allows for the provision of the affordable housing component, despite not being a requirement.

- The Project closely aligns with Northern Beaches Planning policies, in particular the ***Towards 2040 - Local Strategic Planning Statement (Feb 2020)*** and the ***Northern Beaches Council - Affordable Housing Policy***, and meets the community needs (including some of the most vulnerable and low-income groups).
- The integration of Social Housing for people with an intellectual disability with other Housing for Seniors and Affordable Housing for older women has the potential to provide employment and volunteering opportunities for the residents with an intellectual disability.
- Project Independence and the concierge service will identify and facilitate these opportunities within the development but could, for example, include gardening and maintenance. The intention, as stated above, is to build “community” in the development, to provide purpose and connectedness and to support the mental and physical well-being of the residents.

Benefits of Seniors Housing

- As Provided by Macroplan a feature of the Northern Beaches population outlook is that growth is expected to be heavily skewed towards older age cohorts. From 2016 to 2036, there will be an additional 27,200 senior residents in Northern Beaches reaching a shortfall of 1,718 units. This means for local residents will eventually more quality senior living housing close to family and friends.
- A vast majority of the existing ILUs were developed in the 1980s, under the superseded SEPP5. Standards for access, open-space, internal unit accessibility amongst many other elements have improved markedly in line with market expectations.

- The model, underpinned by its exceptional location **close to health, transport, civic and recreational services**, moves away from the segregation of over-55s in isolated communities and actively **encourages social connectedness** with the broader Northern Beaches Community and with people of all ages. This intergenerational blending has been proved to enhance health and well-being in seniors.

Strategic Planning Context

The strategic justification for the proposal is outlined in Section 4 of this SEE. In summary, the proposal:

- is consistent with long-standing State level strategic planning objectives, as contained in the Seniors SEPP, to facilitate the provision of seniors housing given the inflexibility of local planning controls in accommodating this form of development
- will provide a range of uses that are compatible with the evolving character of the Frenchs Forest Health and Education Precinct as identified in the Greater Sydney Region Plan and North District Plan
- will provide additional housing for seniors within the Northern Beaches LGA, a need that is identified in Council's Draft Housing Strategy
- will contribute to diverse and affordable housing types in an area in which there is demonstrable demand for these housing types
- will contribute to housing within walkable neighbourhoods
- will create opportunities for older people to continue living within their communities
- will contribute to the co-location of health services, seniors housing and commercial services
- will contribute to additional employment opportunities within the business park
- will contribute to the delivery of a healthy, safe and inclusive precinct for people of all ages and abilities that support active, resilient and socially connected communities by activating Frenchs Forest Road throughout the day and evening
- responds to the identified increase in demand for local aged care facilities and accommodation from the ageing Northern Beaches population

Statutory Planning Framework

Sections 5 of the SEE considers relevant State legislation and State and local environmental planning instruments, including:

- Section 4.15 of the EP&A Act
- *Environmental Planning and Assessment Regulations 2000*
- *Rural Fires Act 1997*
- *State Environmental Planning Policies (SEPPs)*, including:
 - *State Environmental Planning Policy (Housing for Seniors of People with a Disability) 2004*
 - *State Environmental Planning Policy No. 19 – Bushland in Urban Areas*
 - *State Environmental Planning Policy No.55 – Remediation of Land*
 - *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development*
 - *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
 - *State Environmental Planning Policy (Infrastructure) 2007*
 - *Draft State Environmental Planning Policy (Environment)*
 - *Draft Remediation of Land State Environmental Planning Policy*

- *Warringah Local Environmental Plan 2011*
- *Warringah Development Control Plan 2011*

The proposed development is permissible with consent under the provisions of the Seniors SEPP and is consistent with other State and local planning instruments and controls.

The proposed development is considered Integrated Development for the purposes of section 4.46 of the EP&A Act as it requires approval in accordance with section 100B of the *Rural Fires Act 1997* (Fire Act).

Environmental Planning Assessment

A detailed assessment of the potential environmental impacts of the proposal is contained in Section 6. This section considers the following key issues:

Built Form and Amenity

The proposed development comprises separate buildings, ranging in height from 3 to a maximum 12 storeys and a range of commercial uses on the ground floor with seniors living apartments (independent living) and associated common areas above.

The site has no applicable FSR or maximum height of building development standards. Therefore, the proposed built form and its scale has been determined through the development of 8 design principles:

1. Acknowledge and respond to recent residential approval and context of the surrounding land uses
2. Retain existing vegetation boundary
3. Perimeter block form with generous central landscaped open space
4. Provide generous setbacks and building separation
5. Maximise landscaped area and deep soil
6. Minimise building height impact by appropriately locating taller building forms
7. Enhance pedestrian movement, address and access
8. Ground level uses to enhance activation

Through an extensive siting and massing study, the resultant proposal was developed as the preferred option as it demonstrates to provide the best design outcome which minimises impacts to surrounding sites. Increased setbacks, a perimeter block form, generous open space provisions, non-residential use provisions and siting have contributed to ensuring a high quality design outcome.

A Visual Impact Analysis has been undertaken as part of the Design Report & Verification Statement at Appendix 3. The Analysis demonstrates that given the setbacks, siting and massing of the development, the proposal has minimal visual impacts to surrounding receivers.

The proposed 12 storey component occupies a small part (16.9%) of the total site area. It is also sited to minimise impacts on the surrounding area, based on the design principles listed above. The proposed maximum building height is also broadly consistent with the nature of recent approvals in the B7 zone, and the new hospital.

Open Space, Public Domain and Landscaping

The proposal incorporates extensive landscaping and generous provisions of open space. The development provides 5,252m² of landscaped area (42% of total site area) with 2,188m² of this being communal open space as shown in the accompanying Landscape Plans (Appendix 4).

The provision of a centralised open space area provided in the form of a piazza ensures a high level of amenity for future residents. The piazza includes a community garden, children's play area, seating and extensive plantings to provide for a range of recreational activities for residents as well as visitors and the public. The location of the piazza ensures cohesion between the proposed development and the approved seniors living development on the adjoining lot to the north.

Noise

A noise assessment has been prepared by Acoustic Logic in accordance with Warringah Development Control Plan 2011, Warringah Local Environmental Plan 2011, Noise Policy for Industry 2017, NSW Road Noise Policy, and relevant Australian Standards.

The report concludes that the proposal will comply with adopted noise emission guidelines if recommended mitigation measures are implemented.

Economic and Social Issues

An Economic Analysis Report prepared by HillPDA, Seniors Housing Demand Analysis prepared by Macroplan and Social Impact Report prepared by Chris Faulks accompany this application and demonstrate the economic and social benefits and the need for the proposed development.

The Economic Report demonstrates the operational benefits of the proposed development including:

- 81 jobs, 37 more than currently provided onsite
- a wage generation of \$5.5 million per annum, \$1.7 million more than current uses onsite
- a Gross Value Added (GVA) of \$6.7 million per annum, \$1.7 million more than the current uses onsite
- increase local retailers GVA of approximately \$1.6 million per annum
- increased employment density onsite
- a more orderly and efficient use of the land that aligns with State planning objectives on a site that would benefit from its proximity to the nearby Hospital

The Seniors Housing Demand Analysis emphasises the need for seniors living developments to meet the growing aged population within the Northern Beaches Local Government Area. It demonstrates how the proposal meets the relevant Strategic Planning objectives for the region as outlined in the Draft Northern Beaches Housing Strategy.

The Social Impact Report demonstrates that the proposal addresses the shortfall of seniors, social and affordable housing within the Northern Beaches LGA. The report finds the proposed development is innovative in its design and has an integrated approach to housing. The proposal co-locates seniors housing with social and affordable housing. It ensures

access to the housing market for a diverse range of people and provides a variety of community spaces and ground level services.

Traffic and Transport

The Traffic Impact Assessment prepared by Varga Traffic Planning finds that Skyline Place and surrounding streets can adequately accommodate the anticipated vehicle generation from the senior's living and mixed use development.

The traffic generation rates for the future development of the proposed seniors housing will not produce any significant impacts on the existing road network. 232 on-site parking spaces are provided within the two basement levels to meet the needs of the future residents and visitors.

The senior's independent living apartments are within 60 metres of the nearest bus stop and walking distance to nearby amenities, shops and services within the Frenchs Forest Town Centre.

Other Matters

This SEE also considers matters (Section 6) relating to:

- Waste Management;
- Crime Prevention Through Environmental Design;
- Environmental Sustainability;
- Construction Management;
- Operational Management; and
- Building Code of Australia (BCA)

Conclusion

This SEE provides a comprehensive environmental assessment of the proposal including impacts and proposed mitigation measures. The development has been shown to provide for a seniors living and mixed use development that will significantly contribute to meet the identified undersupply of seniors housing in the Northern Beaches LGA and the evolving character of the B7 Business Park zone within the Frenchs Forest Business Park.

The proposal complements the approved, adjacent seniors living and mixed use development and ensures the provision of seniors housing that is both appropriately located and of a high quality design, consistent with the provisions of the Seniors SEPP.

Accordingly, given the positive planning merits of the development, the SEE concludes that the proposal warrants approval.

1 Introduction

This Statement of Environmental Effects (SEE) has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Platino Properties Pty Ltd* (the Applicant) to accompany a development application (DA) for a seniors housing and mixed use development at 5 Skyline Place, Frenchs Forest.

This SEE has been prepared and is submitted to Northern Beaches Council (Council) pursuant to the provisions of Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The proposed development comprises:

- Demolition of the existing office/warehouse building and at grade car parking on the site
- Construction of two separate buildings, ranging in height from 6-12 storeys, containing:
 - a total of 133 independent living units, including:
 - 12 affordable dwellings for seniors and
 - 10 units for disability housing operated by Project Independence
 - a mix of 1, 2, 2 bed + study and 3 bedroom dwellings
 - 10 units to be operated by Project Independence (further information provided below) and made available for disability housing
 - 941m² of commercial floorspace which may include allied health, restaurants, co-working spaces, dentistry, hospital uses, home care provision and /or day-care respite centres
 - approximately 19,200m² overall floorspace
- Stratum subdivision into 3 lots - residential, affordable and commercial
- Height range of 3 to 12 storeys, or 10-39 metres (including roof-top gardens for use by all residents)
- Approximately 2,188m² of open space (42% of the site), including a central publicly accessible piazza
- Common Facilities including a pool provided within a centrally located position between the mixed use buildings
- Central community gardens
- Basement car parking for 232 spaces, with access from the access ramp to the approved car park on proposed Lot 2

This SEE describes the site, its surroundings and the proposed development. It also provides an assessment of the proposals in terms of the matters for consideration under section 4.15(1) of the EP&A Act.

This SEE demonstrates that the proposal is consistent with the relevant provisions of the:

- *Warringah Local Environmental Plan 2011*
- *Warringah Development Control Plan 2011*
- *State Environmental Planning Policy (Housing for Seniors of People with a Disability) 2004*
- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas*
- *State Environmental Planning Policy No. 55 – Remediation of Land*

- *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *Draft State Environmental Planning Policy (Environment)*
- *Draft Remediation of Land State Environmental Planning Policy*

This SEE concludes that the proposal is consistent with the aims and provisions of the Seniors SEPP, will provide substantial net benefits to future residents and the broader community and does not result in any significant environmental impacts.

We recommend that the Council approve the DA subject to the content and findings outlined in this SEE.

1.1 Report Structure

The SEE has been prepared in accordance with the requirements of Part 4 of the EP&A Act and Schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). The structure of the report is as follows:

Section	Overview
Executive Summary	An overarching summary of the findings and conclusions of the assessment contained within this SEE.
1 Introduction	Introduction to the SEE.
2 Site and Locality	A description of the site, the context and an assessment of the opportunities and constraints presented by the site.
3 The Proposal	A detailed description of the proposed development application and site operations.
4 Strategic Planning Context	A detailed review of the proposal against the State and local planning framework including an assessment of statutory and strategic planning considerations.
5 Statutory Planning Context	A detailed review of the proposal against relevant statutory planning legislation.
6 Environmental Planning Assessment	An in-depth assessment of the relevant planning controls, existing environment, proposal and potential impacts and public benefits arising from the proposed staged development application.
7 Conclusion	A concluding statement taking into account the assessment of the proposal and a recommended course of action with regard to the determination of the application.

Table 1: SEE Report Structure

This SEE should be read in conjunction with the following supporting documents:

Appendix	Report
Appendix 1	Architectural Plans
Appendix 2	Supplementary Architectural Plans not requiring approval
Appendix 3	Design Report & Verification Statement
Appendix 4	Landscape Design & Plans
Appendix 5	Economic Assessment Report
Appendix 6	Seniors Housing Demand Analysis
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Appendix 18	Geotechnical Report
Appendix 19	Civil & Stormwater
Appendix 20	Construction Management Plan
Appendix 21	BASIX and NatHers Report
Appendix 22	<i>State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004</i> and Guideline Assessment
Appendix 23	Warringah Development Control Plan 2011 Assessment
Appendix 24	Operational Management Plan

Table 2: List of Appendices

1.2 Consent authority

The *cost of works* for the purpose of determining the DA fee for the proposal is calculated in accordance with Clause 255(1) of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) at \$62,676,811 excluding GST.

As the estimated cost of works exceed \$20 million, the DA will be determined by the Sydney North Planning Panel (SNPP).

1.3 Integrated development

The proposed development is considered Integrated Development for the purposes of section 4.46 of the EP&A Act as it requires approval in accordance with section 100B of the *Rural Fires Act 1997* (RF Act).

1.4 Consultation with Council

1.4.1 Pre-lodgement meeting with Council

On 12 January 2021, a DA pre-lodgement meeting was held with Council to discuss key issues associated with the development application.

A summary of the key issues raised and a response to each is detailed in the table below:

Issue raised	Response	Section in SEE
Land Use		
<ul style="list-style-type: none"> Support cannot be provided for the residential component as it is inconsistent with the desired future character for the Frenchs Forest B7 Business Park precinct identified in the Hospital Precinct Structure Plan Council and the State Government are seeking to increase employment opportunities in Frenchs Forest by utilising the B7 Business Park zone for employment purposes in the future 	<ul style="list-style-type: none"> Issue of inconsistency with zone objectives was addressed and resolved through the SNPP's approval of development on proposed Lot 2 and supported by Applicant's legal advice, ie: while the consent authority must have regard to the B7 zone objectives, it must also recognise that the aims of the Seniors SEPP – which relate to the supply of seniors housing and which set aside local planning controls - prevail over the zone objectives. Issue of consistency with zone objectives is not relevant to the DA, given the Seniors SEPP prevails over the LEP. The proposed employment on site considerably exceeds the planning growth vision for the precinct. The proposed employment land uses are aligned with the vision within the HPSP being to grow and mature to support the health and education precinct and to strengthen the localities employment base. As concluded by the Economic Impact Assessment prepared by HillPDA (Appendix 5) the proposal will not significantly impact on the ability of the precinct to meet its employment targets. 	<p>Section 4.5, Section 5.3.1 and Section 5.4.1</p>
<ul style="list-style-type: none"> An analysis of the economic impact of the proposed residential component on the current and future economic activities of the Business Park (including logistics and urban services) is recommended in order to understand potential impacts. 	<ul style="list-style-type: none"> An Economic Impact Assessment prepared by HillPDA accompanies the DA (Appendix 5) and considers the current and future economic activities of the Business Park. The Assessment makes the following key findings: 	<p>Section 6.8.1</p>

Issue raised	Response	Section in SEE
	<ul style="list-style-type: none"> - the site comprises 1.2% of the Frenchs Forest Business Park (B7 Zone) - the Business Park is underutilised and has potential for increased employment - the Business Park is transitioning into a higher order health and education precinct - the use of the site for seniors housing with associated employment in accordance with the Seniors SEPP will likely have no effect on the employment objectives of the Business Park - the proposal increases employment on-site from 44 to 81 jobs, representing an additional 31 jobs an increase of 84% 	
<ul style="list-style-type: none"> • Concern of potential land use conflicts and residential amenity, particularly, noise for occupants, truck movements, hours of operation of nearby business, accessibility and safety 	<ul style="list-style-type: none"> • The proposed development will be bordered by the approved seniors living and mixed use development to the immediate north and will provide for a high level of amenity for all future residents. The proposal has also been designed to minimise potential land use conflicts to the south, east and west through measures such as the east-west orientation of apartments and substantial boundary setbacks (also noting that there is no immediately adjacent development to the west and east given Skyline Place and the transmission line easement to the east and west respectively) and extensive perimeter landscaping. • The traffic and acoustic reports submitted with this SEE confirm no significant impacts to or from the 	Section 5.4.1

Issue raised	Response	Section in SEE
	development in relation to nearby non-residential uses.	
Built Form and Design		
<ul style="list-style-type: none"> • Adjacent precedent of 6 storeys on Lot 2 should be the benchmark height for development of the site noting the site's prominence from surrounding views • All floors above level six are not supported • Council does not accept the precedent example of the Parkway Hotel and Northern Beaches Hospital as justification for the proposed heights • There may be scope for a combination of 6 and 7 storey elements subject to addressing DSAP comments 	<ul style="list-style-type: none"> • Height has been distributed across the site to achieve the best possible outcome. The tallest building, at 12 storeys, occupies only 16.9% of the total site area. Proposed heights are broadly consistent with multiple recent approvals in the B7 zone, and the Northern Beaches Hospital which provide an indication of the future character and form of the Business Park. • The approved 6 storey development on Lot 2, having direct frontage to Frenchs Forest Road, has a different site context to the current proposal, which is setback approximately 60 m to 105 m from Frenchs Forest Road East and Warringah Road respectively. The existing buildings on adjacent sites and the approved seniors living and mixed development on Lot 2 will limit views to the site. • The proposed development has been designed to be capable of subsidising the provision of the 22 proposed affordable and social housing dwellings. The development feasibility is premised on the return generated by the seniors living units and any reduction in the number of these units within the development would result in a reduced ability to provide for the affordable and disability housing components of the proposal. • The proposed height has been derived from a 	Section 6.1 and Appendix 3

Issue raised	Response	Section in SEE
	<p>detailed site analysis, siting and massing study and a visual impact analysis which demonstrate that the proposal has no adverse visual impacts.</p>	
<p>Council has the following built form comments:</p> <ul style="list-style-type: none"> • Stepping of upper floors • Break up north and south modules into distinct and separate built forms (4 blocks as opposed to 2) • Inadequate southern boundary setback to future development • Inadequate side setbacks • Excessive length of unbroken building fronting Skyline Place • Inadequate front setback to Skyline Place considering building height 	<ul style="list-style-type: none"> • Stepping of upper floors of all buildings provided. • 5.3 m - 9 m landscaped setback to residential uses provided along southern boundary • Side setbacks – 9 m setback provided to the west, also noting that there is no immediately adjacent development to the west the transmission line easement; 7.6m to 8.8 m to the east (which is greater than the 6 m setback to Skyline Place of the approved development), also noting existing development to the east is located approximately 26 metres to the east beyond Skyline Place. • East building comprises 2 distinct forms through offsetting of southern and northern portions and modulation through central recess between the 2 forms • Building with frontage to Skyline Place is 6 storeys with a setback of 7.6 m – this is greater than the 6m setback of the approved development (also 6 storeys) to Frenchs Forest Road. Proposed setback increases to 8.8 m for the southern part of the building which is 12 storeys in height. • The eastern and western facades are articulated and incorporate strong vertical and horizontal articulation between the two united 	<p>Section 6.1 and Appendix 3</p>

Issue raised	Response	Section in SEE
	<p>elements along Skyline Place:</p> <ul style="list-style-type: none"> ○ Vertically the two forms are visually separated by a deep and wide notch coinciding with windows providing natural light and air to the common circulation corridors ○ Horizontally the tower form is setback an additional 4.9m from Skyline Place <ul style="list-style-type: none"> ● Given the need for functional connectedness and a desire to create a floor-by-floor sense of community, the strong articulation between the 12 storey and 6 storey forms is an effective way to break down the apparent bulk and scale of the proposal. 	
<ul style="list-style-type: none"> ● Development on the rear part of the site (25%) must not exceed 1 storey in height under Clause 40(4)(c) of the Seniors SEPP 	<ul style="list-style-type: none"> ● Clause 40(4)(c) only applies to residential zones in which residential flat buildings are prohibited. As the site is not within a residential zone, this clause does not apply to the proposal. 	N/A
<ul style="list-style-type: none"> ● Pre-lodgement drawings do not provide sufficient site analysis information to determine solar access, views to neighbouring properties, overshadowing and amenity of residents and neighbours 	<ul style="list-style-type: none"> ● All information is included in the DA package. 	Appendices 1 and 2
<ul style="list-style-type: none"> ● Length of the blocks on the eastern and western boundaries demonstrate 56m of unbroken façade ● Council recommends minimum of 9m breaks be required along these buildings ● Further “through-site” links to the central courtyard space could be provided in the form of clear breaks in the built form blocks of both east and west buildings 	<ul style="list-style-type: none"> ● The Eastern building comprises 2 distinct forms through offsetting of southern and northern portions and modulation through central recess between the 2 forms ● The Western building incorporates central recess to modulate façade to read as 2 distinct forms. ● As detailed previously, there are strong operational and functional relationships that 	Section 6.1 and Appendices 1 and 2

Issue raised	Response	Section in SEE
	<p>work against a distinct physical building separation.</p> <ul style="list-style-type: none"> The eastern and western facades are articulated and incorporate strong vertical and horizontal articulation between the two united elements along Skyline Place. Given the need for functional connectedness and a desire to create a floor-by-floor sense of community, the strong articulation between the 12 storey and 6 storey forms is an effective way to break down the apparent bulk and scale of the proposal. 	
<ul style="list-style-type: none"> Improves through site links Pedestrian movement could be further enhanced through a finer grained wayfinding strategy resulting from breaking down the mass Smaller buildings with individual address is recommended for legibility across the site 	<ul style="list-style-type: none"> There are strong operational and functional relationships that work against pedestrian movement. The prominence of the central courtyard off Skyline Place, located immediately between the approved development on Lot 2 and the current proposal is approximately 20m. 	Section 6.1 and Appendix 3
Stormwater		
<ul style="list-style-type: none"> The proposed basement carpark is located over/through stormwater pipelines noted within the site It is believed the stormwater infrastructure shown are not Council assets but actually privately managed If the pipeline is confirmed to be a Council asset, the proposal would not be supported 	<ul style="list-style-type: none"> Refer to the Civil and Stormwater Report 	Appendix 19
Landscape and Arboricultural Impact		
<ul style="list-style-type: none"> Siting of the western block appears to impact upon a high retention value Spotted Gum (tree 82) Swamp Mahogany (tree 128) and Spotted Gums (trees 131 & 132) are to be retained and protected 	<ul style="list-style-type: none"> All proposed tree removal addressed in the Arboricultural Impact Report. 	Appendix 16

Issue raised	Response	Section in SEE
<ul style="list-style-type: none"> Sydney Blue Gums (trees 103, 104 and 105), Spotted Gums (trees 106 - & 115), and Paperbarks (trees 108, 110 & 112) within the site are to be retained and protected An Arboricultural impact assessment is required 		
<ul style="list-style-type: none"> It is noted that the southern boundary setback to basement is 6.0m and this presents challenges in the establishment of tall canopy trees 	<ul style="list-style-type: none"> As shown in the Landscape Plans, the southern boundary setback incorporates substantial planting, including canopy trees. 	Section 6.2 and Appendix 4
Traffic		
<p>Traffic and Parking report to address the following:</p> <ul style="list-style-type: none"> Interaction between residential and commercial parking and traffic Impacts on Skyline Place and Frenchs Forest Road Accessible path of travel along Skyline Place Carpark layout in accordance with AS1428 Design of exit ramp to the cul-de-sac Design of waste collection truck access Drop off ramp to the southern building near the main entry (2 car spaces with ramp) 	<ul style="list-style-type: none"> All issues addressed in Traffic and Parking Assessment Report. 	Section 0 and Appendix 9

Table 3: Summary and response to pre-lodgement comments

As demonstrated above, this Application has been prepared in accordance with the direction discussed at the pre-lodgement meeting. The pre-lodgement meeting minutes have informed the resultant design of the development and all issues raised have been addressed.

1.4.2 DSAP meeting

On 22 October 2020, the Applicant met with Council's Design and Sustainability Advisory Panel (DSAP) to obtain feedback on the initial architectural plans proposed for the development as part of the pre-DA process.

A summary of the comments that the DSAP provided regarding the initial design and the subsequent design changes made is provided in Table 4 below.

DSAP Comment	Design Response
Explore a range of approaches to the massing of buildings to derive urban design and planning principles	A study of alternative siting strategies and massing scenarios has been prepared, including the identification of two preferred scenarios, and are included in the Design Verification Statement (DVS) (Appendix 3) in Section 6.1 of this report.
Adopt an urban design and landscape led approach	A set of guiding Design Principles has been prepared to direct the detailed design response for the development of the site. These are included in the DVS (Appendix 3) in Section 6.1 of this report.
Compelling arguments needed to support the 12 storey height	<p>The proposed building heights and distribution of building forms on the site has been determined following a detailed and thorough consideration of massing scenarios and strategies as well as an assessment demonstrating minimal adverse overshadowing and visual impacts on the surrounding area and within the site.</p> <p>The proposed development has been designed to be capable of subsidising the provision of the 22 proposed affordable and social housing dwellings. The development feasibility is premised on the return generated by the seniors living units and any reduction in the number of these units within the development would result in a reduced ability to provide for the affordable and disability housing components of the proposal.</p> <p>A study of surrounding building heights in the locality demonstrates the variety of existing and approved building heights in the area, including a number of taller buildings such as the Northern Beaches Hospital and Parkway Hotel in the immediate vicinity of the site. Surrounding building heights located within the vicinity of the subject site are summarised below and shown in Figure 3:</p> <ul style="list-style-type: none"> • Northern Beaches Hospital – 40 metres • Parkway Hotel – 26.4 metres • Oncology Centre – 22 metres • 16 Tilley Lane – 25.8 metres • Silo Structure – 27 metres • Jardin (approved development on Lot 2) – 24.6 metres <p>The siting of the taller building heights and massing arrangement is the result of a detailed design review process and results in minimal amenity impacts to surrounding properties, as detailed in Section 6.1 and the DVS (Appendix 3).</p>
Prepare a built form options study for tower locations to assess impacts	The study undertaken to consider and assess alternative siting strategies and massing scenarios assessed the likely impacts of a range of tower locations and heights within the

DSAP Comment	Design Response
	site. Preferred scenarios have been chosen based upon minimising the impacts on surrounding areas. This has been addressed in the DVS (Appendix 3) and in Section 6.1.
Undertake a visual impact analysis of final preferred scheme	A Visual Impact Analysis for the two preferred scenarios has been undertaken and is provided in the Alternative Siting Strategies and Massing Studies document that has been submitted for pre-DA discussion with Council. A Visual Impact Analysis has been included in the DVS (Appendix 3) and in Section 6.1.
Locate and orient uses to ensure business park uses adjoining can continue	This has been considered as part of the Alternative Siting Strategies and Massing Studies review.
Consider providing an internal pedestrian street network	<p>All of the development siting options provide for clear pedestrian access through the site.</p> <p>The provision of additional pedestrian streets through the site has been considered as part of the Alternative Siting Strategies and Massing Studies review, although on balance has been discounted primarily due to corresponding reduction in landscape area.</p>
Clearly define all building entries	Building entrances are clearly identifiable from the public domain and configured to allow for passive surveillance. Building entries are highlighted through the careful manipulation of building form and materials to denote entry.
Minimum 9m setback from boundaries	Setbacks have been increased to provide a minimum 9 m in all development scenarios, exceeding the recommendations of the ADG.
Consider increasing landscaped area to 40% and ensure minimum 15% deep soil	Amendments have been made to the carpark layout as well as building envelopes to provide well in excess of the minimum landscaped and deep soil areas. The preferred scenario achieves 60% landscaped area and close to 40% deep soil.
Investigate potential splayed outlook and skewed building layouts	The opportunity to use splayed building forms has been considered as part of the consideration of the massing scenarios and strategies. The preferred development scenario establishes offset tower forms to achieve a similar objective.
Increase setback between buildings and non-residential uses on adjoining sites by a further 3m.	Amendments have addressed this to incorporate increased setbacks. Building separations with the site confirm consistency with ADG guidelines and in some areas identified by the DRP (along the Western and Southern boundaries) setbacks are 50% above the ADG guidelines.
Investigate multi-core typologies to increase cross vent, shorter corridors and less units per core	Amendments have addressed this comment. Corridor lengths have been shortened considerably and there are now a reduced number of units per core. The preferred scenario performs well for cross ventilation.

DSAP Comment	Design Response
Reduce number of apartments with single aspect east and west	The preferred development scenario maximises dual aspect apartments across the scheme.
Develop a sustainability strategy in consultation with Council	A Sustainability Report has been prepared in support of the DA (Appendix 15).

Table 4: Response to DSAP pre-lodgement comments

2 The site and locality

2.1 Site description

The site is located at 5 Skyline Place, Frenchs Forest, within Northern Beaches Local Government Area (LGA). The site has an area of approximately 1.3 ha. The land is legally described as Lot SP49558. The site location is shown in Figure 1. The proposal is to be undertaken on proposed Lot 1, approved under REV2019/0014, which has an area of 7,811 m².

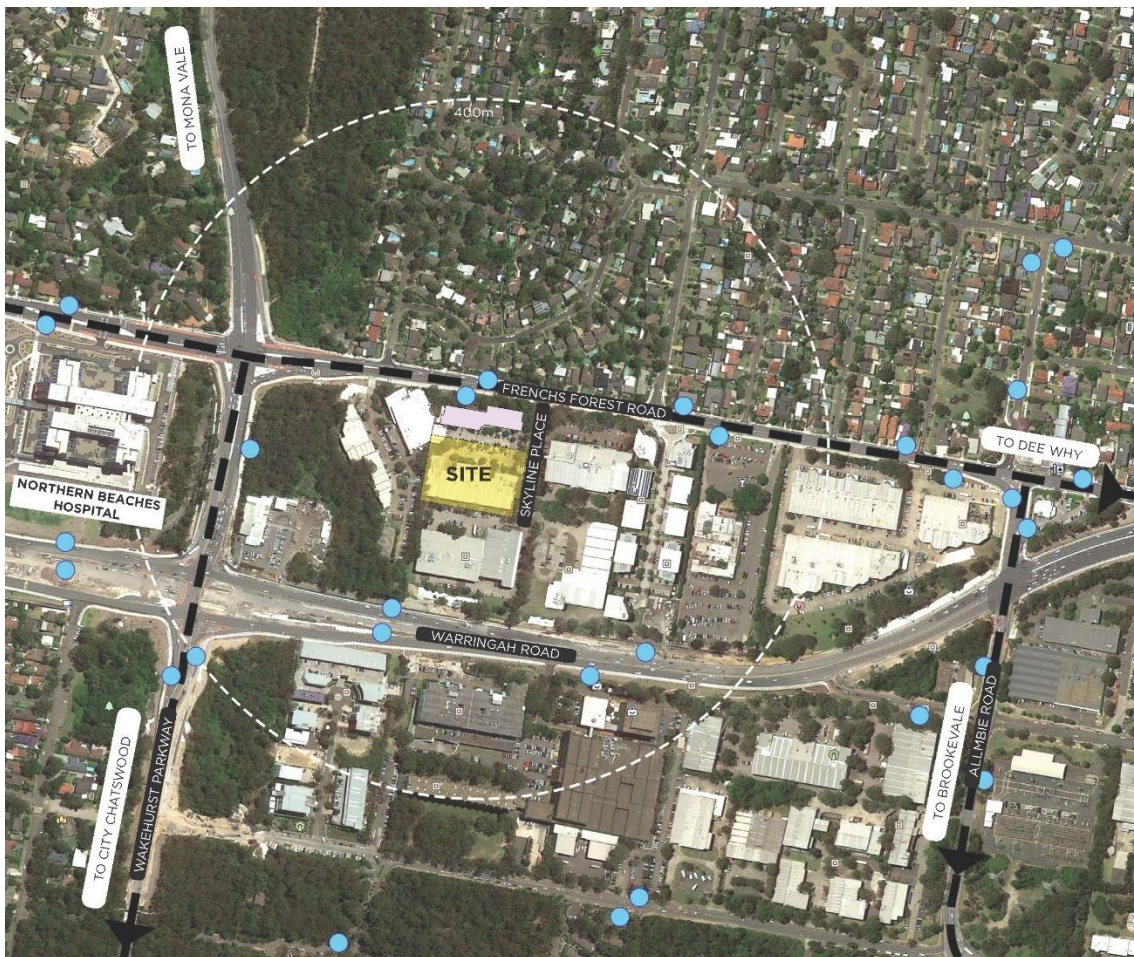


Figure 1: Site location (Source: PA Studio Architects)

The site is bound by Frenchs Forest Road East to the north, existing warehouse development to the south, to Skyline Place to the east and a transmission line easement, surface carparking and a warehouse building to the west. The site is accessible by vehicle from a T-way intersection on Frenchs Forest Road East and Skyline Place. All roadworks to Frenchs Forest Road associated with the Northern Beaches Hospital have been completed.

2.2 Surrounding locality

The site is located within the Frenchs Forest Business Park. The Business Park comprises warehouses and commercial/retail buildings ranging from single three to five storeys as shown in Figure 2 below.

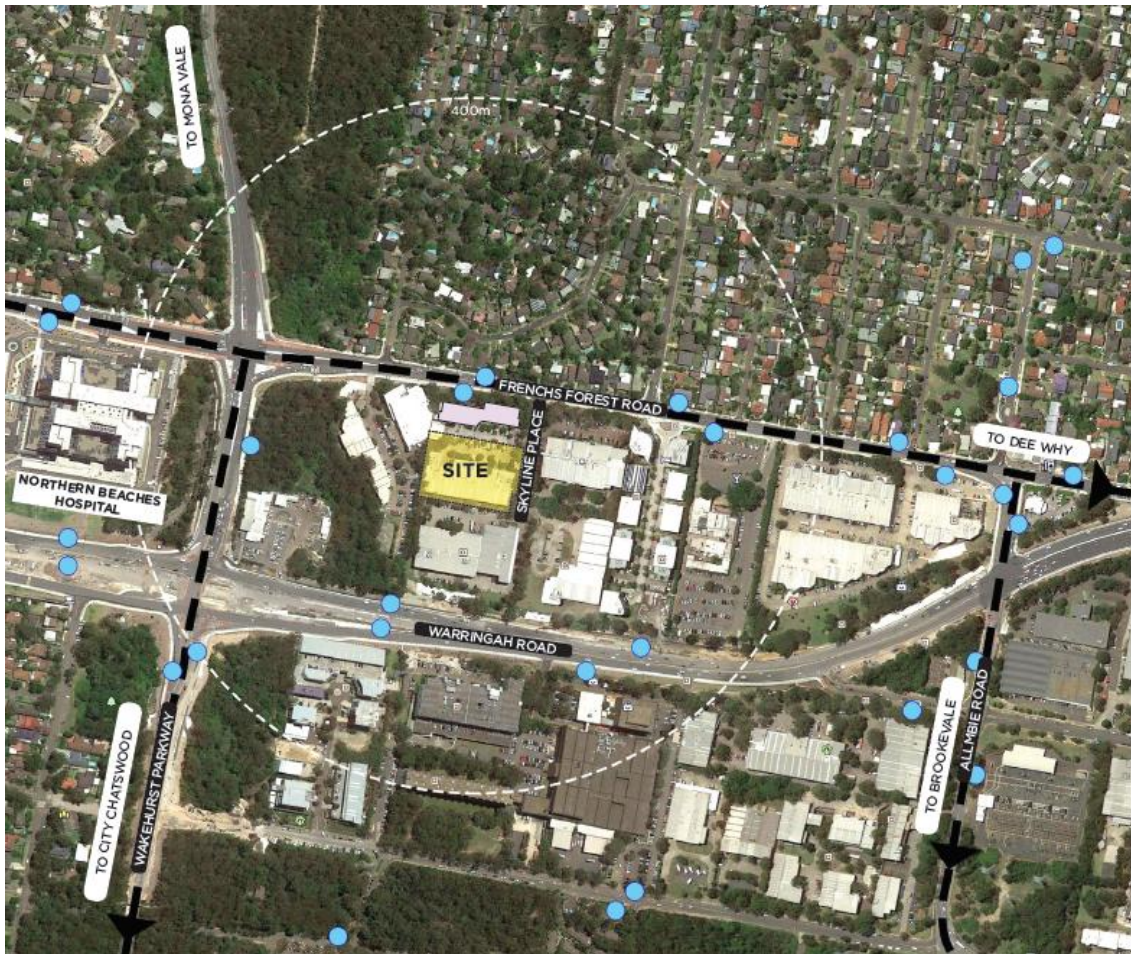


Figure 2: Site context, including built form (Source: PA Studio Architects)

Directly adjoining the northern boundary of the site is the approved development under REV2019/0014. This development includes the construction of a 6 storey mixed use building including seniors living and commercial floor space.

To the north of the site, beyond Frenchs Forest Road East, is land comprising low density residential dwellings. The dwellings are typically 1 to 2 storey detached dwellings. As part of the work undertaken for the Hospital Precinct Structure Plan (November 2016) properties fronting Frenchs Forest Road East and Frenchs Forest Road West are identified as having capacity to accommodate for residential uplift to allow for medium density residential in the future.

To the immediate east and west of the site are commercial premises and large format warehousing ranging between 2 to 4 storey in height within the business park, noting these buildings generally have higher floor to ceiling heights. The business park has also seen an increase in medical related services, such as imaging, pharmaceutical and research uses that complement the hospital precinct.

The precinct is also generously landscaped, providing areas of amenity for workers and visitors, as well as effectively screening the built form. Building heights within the park sit below the existing tree canopy.

To the north-east are the Skyline neighbourhood shops offering a variety of convenience shops including small-scale supermarket, chemist, post-office and bakery. A number of medical suites also front Frenchs Forest Road. The site is also within a 1 kilometre (to the west) of Forest Way Shopping Centre a strategic centre with full line supermarkets, convenience shopping, post office, banking, cafes and restaurants.

The Northern Beaches Hospital is situated approximately 240 m west of the site, within the broader Frenchs Forest Priority Growth Area. The character of the surrounding locality continues to undergo significant transformation with the construction of the new hospital, associated road upgrade works and a variety of new housing and employment development to support the precinct.

This area has also been identified as the Frenchs Forest Health and Education Precinct by the Greater Sydney Commission in the Greater Sydney Region Plan and North District Plan. These Plans recognise the growth and evolution of health and education precincts into mixed use innovation precincts, with the clustering of compatible uses which both capitalise on and strengthen the specialist health and employment functions of these precincts. This includes the *“transition of business parks into higher amenity and vibrant mixed-use precincts, including opportunities for residential development which supports the function of the business park.”*

The built form character of the locality is characterised by large floorplate, multi-storey commercial and warehouse buildings and is rapidly evolving in line with the locality’s designation as a health and education precinct. This evolving character is typified by multiple approvals for larger and taller buildings, as illustrated in Figure 3.



Figure 3: Site in relation to surrounding built form (Source: PA Architect Studios)

2.3 Site History

2.3.1 Development Application 2018/0995

On 13 June 2018, the Applicant lodged a DA (2018/0995) seeking consent for subdivision of land into 2 allotments, demolition of existing structures, and construction of a mixed use development containing 78 Seniors Housing units, and commercial space.

On 18 December 2018, the Sydney North Planning Panel (SNPP) refused consent for the DA.

On 29 March 2019, the Applicant lodged a request to review the determination under section 8.2 of the EP&A Act. This request included an amended scheme aimed at addressing issues raised in the assessment and determination of the DA.

On 18 June 2019, the SNPP considered the section 8.2 review request (REV2019/0014) and approved the DA. The approved works comprise:

- subdivision to create 2 lots: Proposed Lot 1: area of 7,684m² and would contain the existing buildings and car parking south of the site. Proposed Lot 2: area of 4,886m² and site of the proposed development and review of determination
- demolition of existing building (Building E) located in the northwest corner of the site
- construction of a 6 storey mixed use development comprising seniors living and a mix of office/business uses and café with associated basement car parking
- reconfiguration of the existing on-grade car parking on proposed Lot 1
- landscaping
- civil and roadworks

2.3.2 Modification 2019/0654

On 26 August 2020, the SNPP approved a modification to REV2019/0014 to reconfigure the internal layout of the building on the lower four levels including:

- reduction in the amount of commercial/retail floorspace from 2,219m² to 1,652m²
- reconfiguration of level 1 to provide for kitchen, dining, common area, bathrooms, and recreational facility rooms and 2 additional seniors living apartments
- reconfiguration of level 2 to provide for 5 additional seniors living apartments and courtyard areas
- extension of outdoor courtyard area on level 3
- minor changes to the façade to reflect the internal changes

3 The Proposal

The proposed development is described in the table below:

Address/Property	5 Skyline Place, Frenchs Forest (Lot 1)
Ownership	Platino Properties Pty Ltd
LGA	Northern Beaches
Zoning	B7 Business Park
Permissibility	Permissible under <i>State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004</i>
Project	<ul style="list-style-type: none"> • Demolition of existing warehouse building and associated at-grade parking onsite • Construction of a seniors living and mixed use development • Provision of office/business uses space, communal area and basement car parking • Associated landscaping, civil and internal road works

Table 5: Proposal Overview

3.1 Project description

The proposal includes the construction of a 3 to 12 storey seniors housing and mixed-use building. The proposal involves:

- Demolition of the existing office/warehouse building and at grade car parking on the site
- Construction of two separate buildings, ranging in height from 3-12 storeys, containing:
 - a total of 133 independent living units, including:
 - 12 affordable units for seniors and
 - 10 units for disability housing operated by Project Independence
 - a mix of 1, 2, 2 bed + study and 3 bedroom dwellings
 - 10 units to be operated by Project Independence (further information provided below) and made available for disability housing
 - 941m² of commercial floorspace which may include allied health, restaurant, co-working spaces, dentistry, hospital uses, home care provision and /or day-care respite centres
 - Approximately 19,000m² overall floorspace
- Stratum subdivision into 3 lots for disability and affordable housing, other seniors housing and commercial uses
- Height range of 3 to 12 storeys, or 10-39 metres
- Approximately 2,188m² of communal open space (28% of the site), including a central publicly accessible piazza
- Common Facilities including a pool provided within a centrally located position between the mixed use buildings
- Central community gardens
- Basement car parking for 232 spaces, with access from the access ramp to the approved car park on proposed Lot 2.

Architectural drawings, including site analysis, photomontages and computer-generated photomontages have been prepared by PA Architect Studios and are provided at Appendices 1 and 2.



Figure 4: Indicative photomontage of proposal with approved development on Lot 2 in foreground (Source: PA Architect Studios)

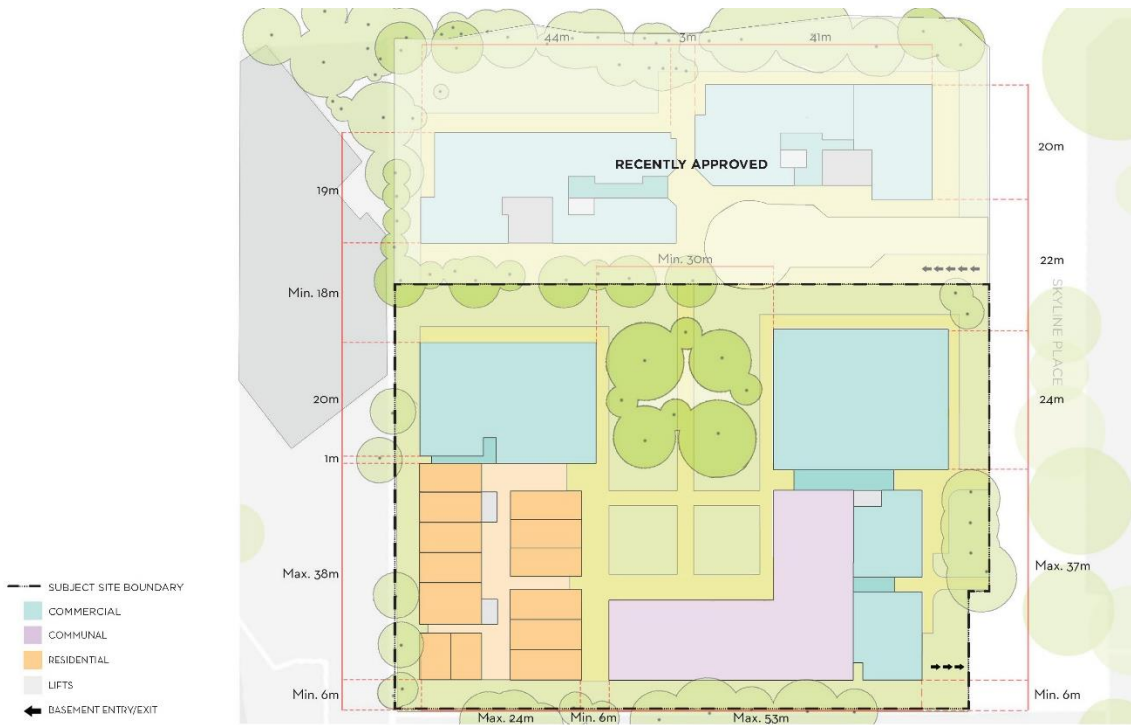


Figure 5: Proposed ground level uses (Source: PA Architect Studios)

The proposal will also require minor works to the approved development on Lot 2 to enable shared access arrangements to the basement car park. The amendment is minor in nature and is limited to the removal of part of the approved basement wall. In addition, it is proposed to include three additional at-grade parking spaces (resulting in a total of 5 spaces) adjacent to the two-way access drive and to reconfigure the spaces from parallel to perpendicular. To

facilitate these proposed works on proposed Lot 2, we request imposition of a condition of consent to modify REV2019/0014 to reflect these works in accordance with section 4.17(1)(c) of the EP&A Act, as reproduced below (**bold** our emphasis):

- (1) A condition of development consent may be imposed if—
- (a) it relates to any matter referred to in section 4.15(1) of relevance to the development the subject of the consent, or
 - (b) it requires the modification or surrender of a consent granted under this Act or a right conferred by Division 4.11 in relation to the land to which the development application relates, or
 - (c) it requires the **modification or cessation of development (including the removal of buildings and works used in connection with that development) carried out on land (whether or not being land to which the development application relates), or**

These modifications would entail replacement of the following plans approved under REV2019/0014:

- DA101 – Site Analysis Plan (Issue B) dated 25/03/2019 prepared by PA Studio
- DA301 – Basement and Lower Floor Plan (Issue B) dated 25/03/2019 prepared by PA Studio
- DA302 – Ground Floor Plan I (Issue B) dated 25/03/2019 prepared by PA Studio

The following proposed plans would replace the abovementioned approved plans:

- DA201 – Lower Basement Carpark (Issue A) dated 15/01/2021 prepared by PA Studio
- DA202 – Basement Carpark (Issue A) dated 15/01/2021 prepared by PA Studio
- DA203 – Ground Floor Plan (Issue A) dated 15/01/2021 prepared by PA Studio

3.1.1 Operational Efficiency

An Operational Management Plan (OMP) has also been developed to ensure the orderly and efficient management of the development following the completion of construction (Appendix 24). The OMP details operational issues such as hours of operation of communal spaces, staffing, parking, transport, emergency services access, security, waste management, and complaint management.

The OMP details how the proposed open space may be utilised by the public for community events. Community groups will be engaged to utilise the piazza space for special events which may include, but not limited to, an outdoor cinema, Christmas markets, and other charity events.

The model of seniors living, is premised upon provision of a high level of innovative service for residents to add value to the lives of seniors by humanising care in an environment where people are independent, empowered, engaged and connected. **It is essential that these services are provided at an affordable cost to all residents, including affordable housing residents.**

It has been demonstrated by a detailed study of operational requirements, undertaken in conjunction with Zinnia Living, that **a minimum of 150 seniors living units are required to provide for the on-site concierge and community facilities at an affordable price.** A smaller number of units cannot provide for the economies of scale and efficiencies that are required to keep the costs to an affordable level. For example, the Resident Concierge Operator

possesses specialist experience in supporting senior residents and people with a disability and provides on-site services / care between 8.00am and 5.00pm 7 days a week. The role and responsibilities of the Resident Concierge Operator will include facilitating the following:

- Community Connection
- Increased resident safety and security
- Supporting local resident to age in place in their community
- Facility Operations
- Aged Care Service
- Support Assistive technology/devices –
- Remote health and wellbeing access
- Passive Surveillance Mail/Parcel Delivery
- Coordinate resident volunteers
- Coordination of locally based allied health professionals
- Proactively encouraging resident health and wellbeing
- Reducing social isolation, encourage interaction
- Establishing groups of interest; &
- Give-back, work with PI and Affordable housing residents for volunteering in the precinct

The provision of such a high level of service is both specialised and valuable, and any reduction in the number of units would necessitate a reduction in either the on-site hours, services provided, reduction in community facilities or an increase in on-going costs.

3.1.2 Housing typologies

The proposal incorporates the provision of seniors housing units (independent living units), affordable housing for women over 55 and disability housing.

Seniors Housing units

The development comprises 111 seniors housing units that will be strata titled and privately owned by future residents. Car parking provision for units has also been made in the proposed two levels of basement.

Affordable housing for seniors

Affordable housing units for over 55's are provided on various levels of the western building including the Levels 1 and 2. The 12 units are specifically dedicated to be owned by community members over 55 that meet the criteria for access to Affordable Housing. An appropriate community housing provider will be allocated to manage the affordable housing component of the development.

Disability housing

Housing for those with an intellectual disability has been provided within the proposed development in collaboration with Project Independence. Project Independence operate an innovative social housing model that allows those with an intellectual disability to enter the

housing market using just their Disability Support Pension. The 10 units provided under this scheme also includes additional accommodation for a live-in coordinator to support the residents in developing their life skills and living independently.

3.1.3 Stratum subdivision

This application seeks Stratum subdivision to subdivide the development into 3 titles:

Stratum Title	Description
Residential (Lot 1)	Includes the 111 seniors housing units delivered by the proposal.
Affordable (Lot 2)	Includes the 22 disability and affordable housing units to be operated by the affordable housing providers.
Commercial (Lot 3)	Includes the 5 commercial tenancies located on ground level.

Table 6: Overview of proposed stratum subdivision lots

The affordable housing component is located within a single stratum in accordance with the requirements of the affordable housing providers. Locating the affordable units adjacent to one another and within the same stratum will reduce running costs. All social and affordable housing is located within the western tower on ground level, level 1 and level 2. The affordable housing providers will have greater control over services to be provided to their residents and will be able to make appropriate arrangements to allow the residents of the affordable component to use the common facilities in the residential stratum (Lot 1).

The provision of a separate stratum with an associated Strata Management Statement, (SMS) will reduce costs allocated to the affordable housing component, because the SMS will allocate costs based on basis of use, not value.

The Stratum Plan of subdivision can be found within the Architectural Plans at Appendix 1.

3.1.4 Communal Uses

The proposed development incorporates a variety of communal spaces to provide future residents with an exceptional level of amenity, including:

- Swimming Pool – a 25 m length pool located on Level 2 within the central building of the development (as shown in Figure 6).
- Gym – located adjacent to the pool on Level 2.
- Community Gardens – gardens are provided on both Level 6 of the eastern tower and within the piazza on Ground Level
- Common Dining and Lounge Areas – Dining and lounge areas for all residents are located on Ground Level with additional dining space on Level 6 of the eastern tower (Figure 7)



Figure 6: Photomontage of indicative swimming pool area (Source: PA Architect Studios)



Figure 7: Photomontage of indicative lounge area on ground level (Source: PA Architect Studios)

3.1.5 Landscaping and Open Space

The objectives of the proposed landscaping scheme are to ensure it contributes to the bushland character of the surrounding area, providing functional and high quality open space areas, providing planting and open space with an appropriate scale, and retaining any significant trees onsite.

The scheme provides 5,252m² (42% of the total site area) of landscaped area with 2,188m² of this being communal open space. A Landscape Plan prepared by Space Landscape Designs is attached at Appendix 4.

Extensive landscaping is proposed to the centralised open space area to provide a publicly accessible piazza (Figure 8). The piazza will also include community gardens for resident use and a children’s play area and open turf area to encourage family and friends to visit. The pathways provided throughout the piazza area add to the walkability and connectivity of the development, including ramps so that the area is accessible to all.



Figure 8: Photomontage of indicative piazza showing children's play area and community gardens (Source: PA Architect Studios)

3.1.6 Affordable and Disability Housing

As described in Section 3.1.1, the proposed development also includes the provision of 22 units (17%) for people with a disability and affordable housing for over 55’s. This includes 12 seniors affordable dwellings and 10 units to be operated by Project Independence (PI). These units are provided throughout the development on Ground Level and Levels 1 and 2.

The proposed development has been designed to be capable of subsidising the provision of the 22 proposed affordable and social housing dwellings. The development feasibility is premised on the return generated by the seniors living units and any reduction in the number of these units within the development would result in a reduced ability to provide for the affordable and disability housing components of the proposal.

The affordable housing portion of the development is justified for the following reasons:

- In 2016 there were 20,126 people in low-income households living in the Northern Beaches. “Low income households” are defined as households with incomes in the bottom 20% of equivalised incomes across Australia. Studies have identified an unmet demand of around 8,100 social housing and affordable rental housing dwellings in the Northern Beaches LGA (excluding households already residing in social housing). Current

waiting times for social housing sit at five to 10 years. Demand for social and affordable housing is projected to increase by around 2,000 dwellings by 2036

- The need for more social and affordable housing options on the Northern Beaches where renting costs are so high is recognised in the Northern Beaches Council's **Affordable Housing Policy**.
- Priority 16 of the Northern Beaches Council **Towards 2040 - Local Strategic Planning Statement** (Feb 2020) recognises the importance of access to quality social and affordable housing and the fact that there is a limited supply of social housing and affordable rental housing on the Northern Beaches. It confirms that rents across the LGA are rated as severely unaffordable to extremely unaffordable for a typical rental household and the lack of affordable housing is more pronounced for households on lower incomes, driving up the demand for social housing and affordable rental housing.

The Applicant has collaborated with Project Independence in order to provide housing for people with a disability as part of the development. PI describe themselves as:

'an innovative social housing development for people with an Intellectual Disability (ID). It represents a new and unique model of homeownership, not only in Australia but also internationally. PI provides people with an ID the opportunity to acquire equity in a property, using just their government Disability Support Pension (DSP), whilst learning the life skills and Supported Decision-Making abilities to live as independently as possible.'

The Project Independence Units have communal living spaces, kitchen and laundry facilities to create a community environment that may assist in further developing their life skills. As detailed previously, there is also the provision of onsite accommodation for a live-in coordinator.

The benefits of providing units for Project Independence include:

- Integrating accommodation for 10 people with an intellectual disability into the proposed development and the broader Northern Beaches community.
- Enabling people with an intellectual disability to purchase and live in a home of their own.
- Supporting people with an intellectual disability to live independently and become part of a connected community.
- Through Project Independence's unique financial model which utilises a component of their disability pension, residents have access to suitable, safe and affordable housing which promotes a sense of commitment and community. The Project Independence person-centred approach is designed to support residents to develop their independence while improving their position in the housing market.

A Letter of Support provided by PI accompanies this application (Appendix 8). The letter demonstrates PI's involvement in the proposal and their support of the proposed development given its provision of much needed housing for those with an Intellectual Disability.

The proposal will ensure the development provides for a diverse range of needs and is accessible to people of varying socioeconomic backgrounds.

3.1.7 Non-seniors/affordable/disability housing Uses

The non-residential component of the development includes the provision of 941m² of commercial gross floor area. These areas are provided at ground level of the eastern and

western buildings, with the largest areas located at the northern end of these buildings to provide activation of the central piazza. The communal spaces, pool and gymnasium, along with the non-residential ground floor commercial uses adopt a more civic architectural character appropriate to their use.

It is intended that these spaces will cater for a range of medical, allied health, and café tenancies. These tenants will meet the needs of the community and contribute to the health and education precinct in which the site is located.

The detailed tenancy use, layout and fit-out will be subject to future Development Applications.

3.1.8 Access, Car parking and Movement Network

Basement car parking is provided over 2 levels for 232 vehicles, comprising 26 commercial parking spaces and 206 residential spaces.

Access to the car parking is provided from the access ramp in the approved car park on Lot 2, with an exit ramp connecting to the southern end of Skyline Place.

There is also provision of an at-grade drop-off adjacent to the main entry to the development on Skyline Place and short-stay parking spaces on Skyline Place and approved internal road on Lot 2. These short-stay spaces may also be used by service vehicles.

The proposal also provides significant pedestrian access throughout the site and through to the approved development on Lot 2. This ensures future residents also have easy access to Frenchs Forest Road to access public transport services.

3.2 Project Need

The proposed development has been informed by a Seniors Housing Demand Analysis undertaken by Macroplan (Appendix 6). The development addresses the demand identified in this analysis by:

- meeting the projected population growth of seniors within the Northern Beaches LGA
- meeting the undersupply of Independent Retirement Living in the Northern Beaches LGA that has been identified in Council's Draft Housing Strategy
- providing new and a diverse range of housing within a highly accessible area close to a town centre as set out in the framework of the Northern Beaches Housing Strategy
- supporting local employment by increasing available employment floorspace and maintaining local employment objectives whilst also generating additional indirect jobs
- accommodating close to 1,000m² of commercial floorspace contributing to future job growth
- allowing more seniors living developments to encourage older people to sell larger family homes to free up housing supply tied up by empty nesters
- contributing to the transition of the Frenchs Forest Business Park into a vibrant Health and Education Precinct containing a mix of complementary uses

The Economic Assessment Report prepared by HillPDA (Appendix 5) demonstrates that the proposal ensures the orderly development of the land within the Frenchs Forest Business Park and the broader Northern Beaches LGA. Specifically, the proposed development:

- provides land uses that facilitate the transitioning of the Frenchs Forest Strategic Centre into a health and education precinct as outlined in the North District Plan
- supports the anticipated evolution of the B7 Business Park zone into a high amenity, mixed employment precinct with seniors living and aged care services within close proximity to the hospital
- provides land uses that generate increased employment and economic output of the Business Park and overall Strategic Centre
- supports an onsite resident population which can retain expenditure within the area and increase viability of developing the proposed nearby town centre
- provides employment opportunities in industries which are growing and forecast to grow at an increasing rate in coming years

A Social Impact Report prepared by Chris Faulks accompanies this application (Appendix 7). The Social Impact Report demonstrates the proposal will provide housing solutions for seniors and disadvantaged groups promoting independence, social connectedness and intergenerational connections. These aspects of the proposal will improve the residents overall quality of life.

As detailed in the Social Impact Report, the proposed development:

- aligns with the Northern Beaches Strategic Planning Policies including *Towards 2040 – Local Strategic Planning Statement* and *Northern Beaches Council – Affordable Housing Policy*
- addresses an exacerbated shortfall of social and affordable housing in the Northern Beaches LGA
- presents world-leading best practice by co-locating social and affordable housing with seniors living
- provides an innovative solution to integrate seniors, social, and affordable housing
- creates employment, health and well-being opportunities among local residents and businesses
- proposes a strata title purchase model providing flexibility and financial freedom for residents (not provided in traditional seniors housing development)
- provides 17% affordable/social housing, exceeding the Council commitment in *Northern Beaches Affordable Housing Policy* of 10% for urban renewal or greenfield developments
- is consistent with the Seniors Housing SEPP

The Seniors Housing Demand Analysis, the Economic Assessment Report and the Social Impact Report demonstrate that the proposal meets the need and demand for seniors housing within the Northern Beaches LGA.

4 Strategic Planning Context

4.1 Greater Sydney Region Plan

The *Greater Sydney Region Plan* (Region Plan) outlines how Greater Sydney will manage growth and change in the context of social, economic and environmental matters. It sets the vision and strategy for Greater Sydney, to be implemented at a local level through District Plans. The overriding vision for Greater Sydney in the Region Plan is to rebalance Sydney into a metropolis of 3 unique but connected cities:

- the established Eastern Harbour City
- the developing Central River City
- the emerging Western Parkland City

Historically, Greater Sydney's jobs and transport have been focused to the east, requiring many people to make long journeys to and from work and other services. The 3 cities vision allows opportunities and resources to be shared more equitably while enhancing the local character we value in our communities. By integrating land use, transport links and infrastructure across the three cities, more people will have access within 30 minutes to jobs, schools, hospitals and services.

The Region Plan provides broad *Priorities and Actions* which focus on the following 4 key themes:

- *Infrastructure and collaboration*
- *Liveability*
- *Productivity*
- *Sustainability*

There are a number of Directions and Objectives that are of particular relevance to the Proposal which are addressed below:

Direction: Housing the city

Objective 10 Greater housing supply

- The Plan recognises the importance of the provision of housing and meeting housing demand by responding to the housing needs, choice and demographic characteristics of the existing and future community. The proposal will contribute to the provision of housing diversity through the provision of 133 new seniors living units, specifically designed for a range of levels mobility and within close proximity to a range of services, including health services, by foot or by public transport.
- The proposed development will provide for a significant number of seniors housing units, contributing to the housing targets for the Central City. The housing supply will be delivered as part of a mixed-use development which incorporates local infrastructure, office and commercial premises and seniors housing.
- Further, as outlined in the Seniors Housing Demand Analysis (Appendix 6), the development will predominantly attract seniors who live in the vicinity of the site. Accordingly, when seniors move from their existing houses, these houses will be added to the market and increase supply for purchasers such as younger families, resulting in the provision of housing that better satisfies diverse demographic needs.

Objective 11 Housing is more diverse and affordable

- The proposed development will provide a significant number of dwellings to meet the growing proportion of smaller households in close proximity to health and commercial services. The number of homes will increase the supply of seniors housing in the Frenchs Forest area, addressing the changing demographic needs of the surrounding area.
- The proposal also includes the provision of affordable housing units and disability housing, ensuring a diverse and cohesive housing development.

Direction: A city of great places

Objective 12 Great places that bring people together

- The proposed development will create a well-designed built environment which is attractive, safe and clean. It will be designed for seniors and will be highly accessible.

Direction: Jobs and skills for the city

Objective 21 Internationally competitive health, education, research and innovation precincts

- The Plan recognises the importance of the co-location of health services, aged care, accommodation and supporting transport infrastructure. The Plan encourages a mix of retail, supporting services and accommodation adjacent to new health precincts. The proposed development supports the health-based precinct through the introduction of residential accommodation, commercial and retail uses and daily services on a site that is located in close proximity to the Northern Beaches Hospital and that is well serviced by public transport.
- The co-location of health services, such as those within the Northern Beaches Hospital Precinct and the proposed seniors housing and complementary commercial services, is consistent with the collaboration, innovation and accessibility outcomes identified within the Region Plan. The proposal will provide convenient and safe access for ageing residents to essential health related services.

Objective 22 Investment and business activity in centres

- The Region Plan recognises that the creation of jobs and provision of services can be initiated within business parks and that these need to be developed from the outset as urban places which can transition into higher amenity and vibrant places while maintaining their main role as an employment precinct. The Plan further states Council's retail and employment strategies should provide further guidance on the transition of business parks into mixed employment precincts, including residential development, to support the business park.
- The site is strategically located in the Frenchs Forest Strategic Centre in the North District. The Frenchs Forest Strategic Centre is identified as a health and education precinct. The site is generally consistent with the priorities and actions of the plan, as it provides appropriate and ancillary uses to the health and education precinct, including residential and employment opportunities, which are consistent with the changing character of the Frenchs Forest area and the transition of the Frenchs Forest business Park into a mixed employment precinct with complementary residential development.
- The Economic Report prepared by HillPDA (Appendix 5) demonstrates that the proposal includes land uses that generate increased employment and economic output of the Business Park and the broader Frenchs Forest Health and Education Precinct.

- The proposal will also support an onsite population which can retain retail expenditure within the local area and increase the viability of developing the proposed nearby Frenchs Forest town centre.

Objective 23 Industrial and urban services land is planned, retained and managed

- The Greater Sydney Region Plan requires the retention of and management of industrial and urban services land. The site is not zoned industrial. The land is zoned for Business Park purposes which the Plan states should be identified for transition including ancillary residential development. This matter is further considered in relation to the North District Plan below.

The proposal will contribute to the provision of a healthy, safe and inclusive precinct through the co-location of health services, aged care accommodation, public transport, supporting commercial and retail uses and an active street life.

4.2 North District Plan

The *North District Plan* (District Plan) was prepared by the Greater Sydney Commission (GSC) in March 2018. It seeks to manage growth in the context of economic, social and environmental matters in the Northern Beaches LGA. It provides the district level framework to implement the goals and directions outlined in the Region Plan for the North District.

The District Plan identifies the ageing of the population of the North District, with Northern Beaches among the 4 LGAs with the largest projected increase in the 65-84 age groups. The District Plan identifies the need for more diverse housing types and walkable neighbourhoods to create opportunities for older people to continue living in their communities. This includes a specific action (11) to delivery inclusive places for people of all ages and abilities, including the co-location of health and aged care facilities. The proposal is therefore entirely consistent with this action.

The site is located within the Frenchs Forest Health and Education Precinct. This Precinct is also identified as a Strategic Centre in the North District. The Frenchs Forest strategic centre is planned to provide knowledge-intensive jobs, innovation and service delivery. The new Northern Beaches Hospital development will be an anchor for these new jobs and is a catalyst for revitalisation of the area and the creation of a vibrant town centre with new homes and jobs.

One of the key principles identified for Greater Sydney's Centres in the North District Plan relates specifically to business parks. The District Plan states (**bold our emphasis**):

*“Not all centres will start as retail centres. Creating jobs and providing services to local communities can be initiated within business parks. However, the built form of these business parks is critical – that is, they need to be developed, from the outset, as **urban places which can transition into higher amenity and vibrant places while maintaining their main role as an employment precinct. Councils’ retail and employment strategies should provide guidance on the transition of business parks into mixed employment precincts including, where appropriate, ancillary residential developments to support the business park.**”*

- Furthermore, the subject site is not industrial and urban services land and the retain and manage principle is not relevant to the subject land nor the subject proposal. Specifically:
 - The Frenchs Forest B7 zone is a fundamentally mixed-use zone which permits a wide range of uses (such as childcare facilities, respite day care centres, hospitals, and hotel and motel accommodation) and prohibits a range of industrial uses, including the specific uses that are cited in the District Plan's definition of industries and urban services, ie: *Industries that enable the city to develop and its businesses and residents to operate. Support the activities of local populations and businesses. Include concrete batching, waste recycling and transfer, printing, motor vehicle repairs, construction depots, and utilities (electricity, water, gas supply).*
 - Under the *Warringah Local Environmental Plan 2011 (WLEP 2011)*, the B7 zone prohibits industries, waste or resource management facilities, vehicle body repair workshops, vehicle repair stations and depots. Accordingly, the B7 zone is not industrial and urban services land as defined in the District Plan and is therefore not subject to the retain and manage principle.

The proposed development is therefore consistent with the District Plan as it will:

- contribute to the provision of seniors housing in the Northern District. The proposal will significantly increase the number of aged care dwellings within the region, improving housing supply and choice on a site that is co-located with a major health facility.
- create opportunities for older people to continue living in their community and in close proximity to health services and support networks.
- contribute to the expected increase in demand for local aged care facilities and home care options.
- contribute to job growth in the Frenchs Forest strategic centre by providing an 84% increase in jobs on the site
- contribute to the provision of commercial uses and employment within the Precinct
- reinforce the centre as an employment hub
- transition the existing business park into a higher amenity and vibrant place
- contribute to clustering of health related and commercial uses within close proximity to the hospital
- contribute to employment within the existing business park
- not result in the loss of industrial and urban services land
- provides for a transition from a business park into a higher amenity and vibrant precinct which accommodates ancillary residential development
- responds to the anticipated needs of an ageing community through the provision of housing diversity within a precinct which is walkable and well serviced by public transport
- enable people to continue to live in their community and support networks
- contribute to the co-location of health services, residential accommodation and commercial and retail services
- contribute to the delivery of a healthy, safe and inclusive precinct for people of all ages and abilities that support active, resilient and socially connected communities by activating Frenchs Forest Road throughout the day and evening
- respond to the expected increase in demand for local aged care facilities and accommodation from the ageing Northern Beaches population.

4.3 Northern Beaches Local Strategic Planning Statement

On 26 March 2020, the *Northern Beaches Local Strategic Planning Statement* (LSPS) came into effect. The LSPS is a 20-year plan which sets out Council's land use vision and planning priorities for the LGA.

The proposal is consistent with the LSPS in particular, *Priority 12 An inclusive, healthy, safe and socially connected community.*

Priority 12 outlines a number of principles to achieve an inclusive and healthy community. The principle of particular relevance to the development states

"Locate seniors housing, social and affordable housing near centres and high-frequency public transport."

The proposal provides seniors housing in a location that is within a health and education precinct, which is well-serviced by health, retail and other services and is adjacent to a bus stop located adjoining the northern boundary of the site with routes to the city and Chatswood.

4.4 Draft Northern Beaches Housing Strategy

The Draft Northern Beaches Housing Strategy (DNBHS) was exhibited from 15 January 2021 to 21 February 2021. The Strategy considers demography, sustainability and housing diversity in determining what is needed to meet future population demands. There are five priority areas outlined under the Strategy including:

- Priority 1 - **Housing Targets:** meet District Plan and 6-10 year housing targets
- Priority 2 - **Detailed planning for centres:** establish sufficient capacity to accommodate housing demand around existing centres
- Priority 3 - **Social and affordable housing:** encourage the provision of affordable housing and plan for boarding houses in appropriate and accessible locations
- Priority 4 - **Precinct sustainability and housing:** investigate and support sustainable housing precincts
- Priority 5 - **Planning for seniors housing:** incentivise the provision of seniors housing in the right locations

The proposal directly meets Priority 5 through the supply of seniors housing in an area appropriate for such development. The site is within an accessible location that is in close proximity to healthcare services demonstrating its' appropriateness for seniors housing. The provision of affordable housing within the proposal also meets the framework of Priority 3 given the sites location.

4.5 Northern Beaches Hospital Precinct Structure Plan

Council has prepared the Northern Beaches Hospital Precinct Structure Plan (Structure Plan) in response to the NSW Government's commitment to significant public infrastructure in the area and identification of the new Northern Beaches Hospital as a new Centre to support the Hospital and surrounding land uses.

This Structure Plan is a draft document that is intended to guide future development around the new Northern Beaches Hospital over the next 20-30 years.

The Structure Plan aims to create a sustainable future for the repositioning of Frenchs Forest into a Strategic Centre and is aligned with *A Plan for Growing Sydney*.

The Structure Plan demonstrates the precinct's ability to reach its full potential as a Strategic Centre and its capacity to evolve over time to include a greater mix of residential, retail and service uses.

The Structure Plan identifies the subject site as land for jobs growth. The Structure Plan states that the Frenchs Forest Business Park is expected to grow and mature under its current zoning to support the new hospital and deepen the locality's employment base.

The proposal will support this by retaining existing employment on the site and providing 941m² of new office and commercial floorspace, with around 37 additional new jobs created on-site. The proposal will therefore have a positive impact on employment on the site.

The proposal will contribute to other strategic planning objectives relating to the provision of housing for an ageing population, co-location of aged housing and local health facilities and opportunities for older people to continue to live in the community.

Whilst this SEE addresses the Structure Plan, we note that it is a draft document that cannot be used as a basis for current planning decisions on development proposals that are permissible under and consistent with a State level planning instrument (i.e. the Seniors SEPP). This was reflected in the judgement of *ACN 603 361 940 Pty Ltd v Northern Beaches Council [2019] NSWLEC 1012*.

5 Statutory Planning Framework

5.1 Environmental Planning and Assessment Act 1979

Section 1.3 – Objects

The proposal is consistent with the objects of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it is considered to promote the orderly and economic use and development of land without resulting in an adverse impact on the environment. Detailed assessment against the objects of the EP&A act is provided below.

Objective	Comment
(a) <i>To promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources,</i>	The proposal provides 133 units, of which 12 units are proposed to be used for affordable housing and 10 units will be used for disability housing to promote a diverse and cohesive community.
(b) <i>to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment,</i>	This SEE provides information on the relevant economic, environmental and social impacts of the proposed development to enable the consent authority to undertake a thorough environmental assessment and assist in its decision-making on the application. The SEE is also supported by a Sustainability Report (Appendix 15).
(c) <i>to promote the orderly and economic use and development of land,</i>	The development promotes the orderly and economic use of the land by providing a mixed use development consisting of seniors housing and commercial uses in an area identified for transition to a health and education precinct containing a wide range of complementary uses.
(d) <i>to promote the delivery and maintenance of affordable housing,</i>	The proposal will provide a significant number of dwellings to meet the growing proportion of smaller households in close proximity to health services and infrastructure. The proposal also includes the provision of 12 affordable housing units, or 17% of the total proposed yield.
(e) <i>to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats,</i>	The site is not identified as comprising threatened and high conservation habitat, wildlife corridors or native vegetation. Notwithstanding, the proposal will not impact the natural environment or any ecological communities.
(f) <i>to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage),</i>	There are no heritage items located onsite or within proximity to the site.
(g) <i>to promote good design and amenity of the built environment,</i>	The proposed design and amenity of the development demonstrates a comprehensive design process which accounted for existing surrounding development and the intended future for the Frenchs Forest Precinct. The design analysis undertaken (as discussed in

Objective	Comment
	Section 6.1) demonstrates the proposed design is the appropriate outcome for the site.
(h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants,	The development will be constructed in accordance with any conditions of consent issued by the consent authority and the relevant requirements that relate to health and safety, construction and maintenance.
(i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State,	The Sydney North Planning Panel is the consent authority for this development application.
(j) to provide increased opportunity for community participation in environmental planning and assessment.	The proposal will be notified in accordance with the Council's notification policy. Council officers will consider any submissions received prior to the determination of the application.

Table 7: Assessment against Objectives of the EP&A Act

Section 4.15(1) Matters for consideration

The following detailed assessment of the proposal is provided which is based on the heads of consideration contained in section 4.15 of the EP&A Act.

4.15(1) Matters for consideration—general

In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

Relevant Provision	Comment
(a) the provisions of:	
(i) any environmental planning instrument, and	The relevant environmental planning instruments are addressed at Section 5.
(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	The relevant proposed environmental planning instruments are addressed at Section 5.
(iii) any development control plan, and	The Warringah Development Control Plan 2011 is addressed at Section 5.5.
(iii)a) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	Not applicable.
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The requirements of the EP&A Regulations are addressed in Sections 5.7.

Relevant Provision	Comment
(v) <i>(Repealed)</i>	
(b) <i>the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,</i>	The impacts of the proposal are addressed in Section 6.
(c) <i>the suitability of the site for the development,</i>	Site suitability is addressed at Section 6.13.
(d) <i>any submissions made in accordance with this Act or the regulations,</i>	Any submissions made on this subject development application will be duly considered and addressed by Keylan. In addition, the Council will consider any public submissions relating to the proposal during its assessment.
(e) <i>the public interest.</i>	Public interest is addressed at Section 6.15.

Table 8: Section 4.15(1) assessment

Section 4.17(1)

The proposal will require minor works to the approved development on Lot 2 to enable shared access arrangements to the basement car park. To facilitate these proposed works on proposed Lot 2, we request imposition of a condition of consent to modify REV2019/0014 to reflect these works in accordance with section 4.17(1)(c) of the EP&A Act, as reproduced below (**bold** our emphasis):

- (1) A condition of development consent may be imposed if—
- (a) it relates to any matter referred to in section 4.15(1) of relevance to the development the subject of the consent, or
 - (b) it requires the modification or surrender of a consent granted under this Act or a right conferred by Division 4.11 in relation to the land to which the development application relates, or
 - (c) it requires the **modification or cessation of development (including the removal of buildings and works used in connection with that development) carried out on land (whether or not being land to which the development application relates), or**

5.2 Rural Fires Act 1997

The vegetation surrounding the site consists of vegetation which is recorded on the Northern Beaches [Warringah] Bushfire Prone Land Map as Category 1 Bushfire Prone Vegetation. As the buffer zone to this vegetation occupies part of the development site and the proposed development comprises seniors housing, the proposed development is classified as a 'Special Fire Protection Purpose Development', pursuant to *Section 100B of the Rural Fires Act 1997*.

A Bushfire Protection Assessment prepared by Building Code and Bushfire Hazard Solutions accompanies the SEE (Appendix 11). The Assessment demonstrates the development's compliance with the provisions of *Planning for Bushfire Protection 2019* and the requirements of the *Rural Fires Regulation 2013*.

Council is required to refer and obtain the general terms of approval for the proposal from the NSW Rural Fire Service.



Figure 9: Extent of bushfire prone land at subject site (Source: Building Code and Bushfire Hazard Solutions)

5.3 State Environmental Planning Policies

The proposal has been designed with regard to the objectives and standards of the relevant planning instruments and policies that apply to the site. Under the provisions of the EP&A Act, the key applicable state environmental planning policies are:

- *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 and Seniors Living Policy: Urban Design Guideline for Infill Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development*
- *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004*
- *State Environmental Planning Policy No. 19 – Bushland in Urban Areas*
- *Draft State Environmental Planning Policy (Environment)*
- *Draft Remediation of Land State Environmental Planning Policy*

The application of the above plans and policies is discussed in detail in the following sections of this SEE.

It is noted that in the case of development for the purposes of seniors housing, the SEPP 65 and the ADG do not apply. Despite this, this instrument has been considered in the light of good urban design and a full assessment against the key principles has been undertaken within the Design Report (Appendix 3).

5.3.1 State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors SEPP) aims to encourage the provision of housing that will increase the supply and diversity of residences that meet the needs of seniors or people with a disability, make efficient use of existing infrastructure and services and be of good design.

The proposed development is clearly consistent with these aims and provides a unique opportunity for seniors housing to meet identified demand, as:

- it provides for independent senior living units (seniors housing) on land that is already zoned for urban purposes (and therefore does not require a site compatibility certificate) and that benefits from existing infrastructure and services
- is located in close proximity to the new Northern Beaches Hospital and town centre
- it incorporates high quality design which responds to both the existing and emerging character of the locality and provides appropriate amenity and accessibility for future residents

Clause 4(1) of the Seniors SEPP outlines land to which the Policy applies, that is, land zoned primarily for urban purposes and if certain types of development including hospitals are permissible.

In this regard:

- The proposed development is located on land zoned B7 Business Park. Business zones are a zone for primarily urban purposes (noting also that land zoned for Business purposes is not identified in clause 4(2) as land not zoned primarily for urban purposes).
- Hospitals are a permissible use in the B7 zone

It is noted that as the site is zoned primarily for urban purposes, a Site Compatibility Certificate is therefore not required under clause 24 of the SEPP.

Clause 4(6) of the Seniors SEPP outlines land to which the Policy does not apply, including land described as environmentally sensitive in Schedule 1. The site has been assessed against land described in Clause 4(6) (Table 9) and in Schedule 1 (Table 10) and it is identified as being environmentally sensitive, however seniors development can be undertaken on the site.

Clause 4(6) Exclusion areas	Comment
(a) Land described in Schedule 1 (Environmentally sensitive land), or	Refer to Table 10 below.
(b) Land (other than land to which <i>Warringah Local Environmental Plan 2000</i> applies) that is zoned for industrial purposes, or	The site is zoned B7 Business Park and is therefore zoned for business purposes, as opposed to being zoned for industrial purposes under an IN1 General Industrial or IN2 Light Industrial zone.
(c) Repealed	
(d) the land to which <i>Sydney Regional Environmental Plan No 17 – Kurnell Peninsula (1989)</i> applies, or	Does not apply.

Clause 4(6) Exclusion areas	Comment
(e) the land to which <i>State Environmental Planning Policy (Western Sydney Parklands) 2009</i> applies.	Does not apply.

Table 9: Assessment of subject site against Seniors SEPP Clause 4(6)

Schedule 1 Exclusion Areas	Comment
Land identified in an environmental planning instrument as:	
(a) Coastal protection	Does not apply.
(b) Conservation (but not land identified as a heritage conservation area in another environmental planning instrument)	Does not apply.
(c) Critical habitat	Does not apply.
(d) Environment protection	Does not apply.
(e) Open space	Does not apply.
(f) Escarpment	Does not apply.
(g) Floodway	Does not apply.
(h) High flooding hazard	Does not apply.
(i) Natural hazard	<p>Clause 27 of the Seniors SEPP allows the consent authority to consent to a DA to carry out development on bushfire prone land if the consent authority is satisfied that the development can comply with the relevant bushfire guidelines.</p> <p>The site comprises a Vegetation Buffer located on the south west corner of the lot.</p> <p>As discussed in Section 6 of the SEE, the proposal is accompanied by a Bushfire Assessment Report which confirms the proposal can comply with Planning for Bushfire Protection 2019.</p>
(j) (Repealed)	N/A
(k) Scenic (but not land that is so identified if: <ul style="list-style-type: none"> (i) The land is within a residential zone in which development of two storeys or more in height is permitted, or (ii) An adjacent residential zone, also identified as scenic, permits development of two storeys or more in height) 	Does not apply.
(l) Water catchment	Does not apply.
(m) Natural wetland	Does not apply.
Land shown cross-hatched on the bushfire evacuation risk map	Does not apply.

Table 10: Assessment of subject site against Seniors SEPP Schedule 1

It is also noted that the proposal satisfies the provisions of clause 19 of the Seniors SEPP which permits seniors housing in commercial zones if the ground floor consists of commercial uses at the street frontage.

An assessment of the proposed independent seniors living units against the relevant Divisions and Schedules of the SEPP is included at Appendix 22 and demonstrates the proposal complies with the site-related requirements and design requirements. The Access Report prepared by Code Performance confirms the proposal's compliance with the relevant Australian Standards (Appendix 12).

The Seniors Housing Demand Analysis report (Appendix 6) identifies there is a clear unmet supply and demand gap in the current market for seniors housing within the Northern Beaches catchment. This unmet supply and demand gap will continue to widen given the ageing demographic trend of the population. The Report identifies that by 2036 there is an expected accommodation shortfall of up to 1,244 dwellings, which is consistent with the housing demands identified in the Northern Beaches Draft Housing Strategy.

The Report identifies the site is suitably located to benefit from the close proximity to transport, shops and a range of services. The site is conveniently located in proximity to the Northern Beaches Hospital and the proposed Frenchs Forest town centre providing housing close to health services and ancillary services, critical to the needs of the ageing community.

5.3.2 State Environmental Planning Policy No.55 – Remediation of Land

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) applies to the State and states that where a DA is made concerning land that is contaminated, the consent authority must not grant consent unless:

- (a) *it has considered whether the land is contaminated, and*
- (b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

A Detailed Site Investigation has been undertaken for the site (Appendix 17). It concludes that the site can be made suitable for the proposed development subject to the implementation of a Remediation Action Plan.

5.3.3 State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development

State Environmental Planning Policy 65 – Residential Apartment Development (SEPP 65) seeks to improve the design quality of residential developments and encourage innovative design. The *Apartment Design Guide* (ADG) is closely linked to the principles of SEPP 65 and sets out best practice design principles for residential developments.

This SEE considers the quality of future residential amenity as part of its assessment of the application.

SEPP 65 does not strictly apply to this development as the proposal is development for the purposes of seniors housing which is not a type of development defined within SEPP 65. Despite this, the Applicant has considered the design objectives and principles within SEPP 65 and the ADG. The Design Verification Statement detailing the consideration of the 9 design quality principles of SEPP 65 and consideration of the ADG is provided in Appendix 3.

A detailed assessment of the proposal against the ADG criteria and SEPP 65 Design Principles is included within the Design Report (Appendix 3). The assessment demonstrates that the proposal is consistent with SEPP 65 and the ADG and provides for a high level of amenity. In particular, the proposed development achieves a very high level of solar access and cross ventilation, far exceeding the SEPP 65 and ADG recommendations.

5.3.4 State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

The *State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004* (BASIX) seeks to encourage sustainable development within NSW.

An assessment against BASIX has been undertaken and a BASIX certificate has been prepared for the development and is provided at Appendix 21. The proposed development will comply with targets of the Building Sustainability Index, specifically:

- Water - Pass
- Thermal Comfort - Pass
- Energy - Pass

5.3.5 State Environmental Planning Policy No. 19 – Bushland in Urban Areas

State Environmental Planning Policy No. 19 – Bushland in Urban Areas (SEPP 19) aims to protect and preserve bushland within urban areas. Schedule 1 of the SEPP identifies area and part areas to which the Policy applies and includes Sydney.

The proposal will require the removal of 13 high category trees and 30 low category trees onsite to facilitate the proposed development. An Arborist Report prepared by Naturally Trees (Appendix 16) accompanies this statement demonstrating the location of proposed trees to be removed and justification for such removal.

5.3.6 Draft Remediation of Land State Environmental Planning Policy

Draft Remediation of Land State Environmental Planning Policy (Remediation SEPP) aims for better management of remediation works by aligning the need for development consent with the scale, complexity and risks associated with the proposed works.

Once adopted, the Draft Remediation SEPP will:

- Provide a state-wide planning framework for the remediation of land
- Require consent authorities to consider the potential for land to be contaminated when determining DAs
- Clearly list the remediation works that require development consent
- Introduce certification and operational requirements for remediation works that can be undertaken without development consent

As discussed in Section 5.3.2, a detailed site investigation for the entire site has been undertaken. Any further contamination investigations onsite are not warranted by the proposal given the previous findings.

5.3.7 Draft Housing Diversity State Environmental Planning Policy

The Department of Planning, Industry and Environment (DPIE) exhibited the *Draft Housing Diversity State Environmental Planning Policy* (Housing Diversity SEPP) between 29 July and 9 September 2020. The Draft Housing Diversity SEPP aims to address housing diversity and affordability and to respond to the economic recovery of NSW following the COVID-19 pandemic. The Housing Diversity SEPP:

- introduces new definitions for build-to-rent housing, student housing and co-living
- amends some state-level planning provisions, particularly for boarding house and seniors housing development
- amends some state-level planning provisions to support social housing developments undertaken by the NSW Land and Housing Corporation (LAHC) on government-owned land
- consolidates three housing-related SEPPs including *Affordable Rental Housing SEPP 2009*, *Housing for Seniors and People with a Disability SEPP 2004* and *SEPP 70 Affordable Housing (Revised Schemes)*

The proposal will contribute to housing diversity and affordability within the Northern Beaches LGA through the provision of additional dwelling types and additional housing for seniors.

5.4 Warringah Local Environmental Plan 2011

Warringah Local Environmental Plan 2011 (WLEP) is the principal Environmental Planning Instrument applicable to the land. It aims to establish planning principles and development controls that will promote the orderly and economic use of land.

5.4.1 Zoning

Under the WLEP, the subject site is zoned B7 Business Park (Figure 10). The objectives of the B7 zone are:

- *To provide a range of office and light industrial uses.*
- *To encourage employment opportunities.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.*
- *To create business park employment environments of high visual quality that relate favourable in architectural and landscape treatment to neighbouring land uses and to the natural environment.*
- *To minimise conflict between land uses in the zone and adjoining zones and ensure the amenity of adjoining or nearby residential land uses.*

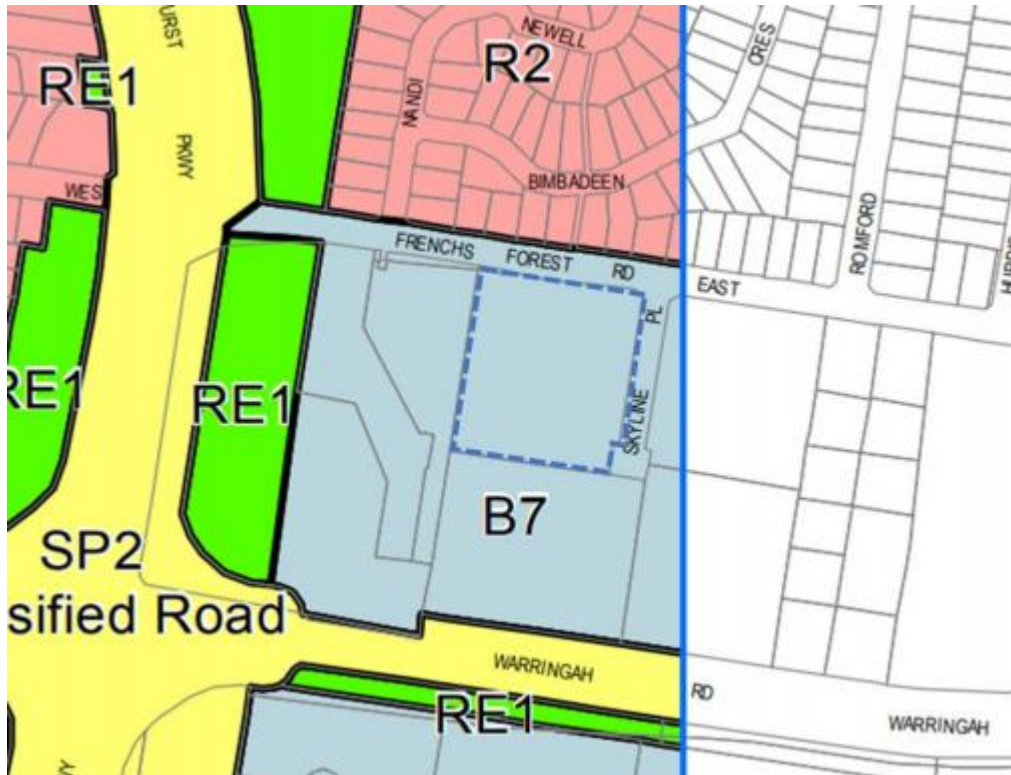


Figure 10: Zoning excerpt with site outlined in dashed blue (Source: WLEP 2011)

The proposal is for the construction and use of the site for a mixed use development including seniors housing, commercial and office premises.

As discussed in Section 5.3.1, under the Seniors SEPP, seniors housing is permissible on land that is zoned primarily for urban purposes on which hospitals are permitted. Development for the purposes of a hospital is permissible on the site as it is a type of *health services facility*, which is permitted with consent in the B7 zone. The proposal is therefore permissible within the B7 zone in accordance with the provision of the Seniors SEPP. Furthermore, whilst the consent authority must have regard to the B7 zone objectives, it must also recognise that the aims of the Seniors SEPP – which relate to the supply of seniors housing and which set aside local planning controls – prevail over the zone objectives.

Notwithstanding, the proposal is generally consistent with the objectives of the zone as it:

- includes 941 m² of commercial space on the ground floor that will contribute to the amenity of both the proposed seniors living on proposed Lot 1 and approved development on proposed Lot 2 under REV2019/0014
- will generate employment opportunities both during construction and during the operation of the development
- will provide 252 direct and indirect jobs during construction and 37 new jobs during operation
- includes a high-quality landscaping scheme for the site which will enhance the shared open space piazza provided as part of the development and will ensure that the existing landscaped character of the area is maintained
- minimises potential conflict between land uses through the siting of the development, design, generous setbacks, landscaping and glazing.

5.4.2 Floor Space Ratio (FSR)

Clause 4.4 of the WLEP relates to FSR. There is no prescribed FSR for the subject site, indicating the capacity of the site and the surrounding B7 area to accommodate larger and denser building forms.

The development proposes a FSR of 2.42:1. In the absence of a prescribed FSR, the proposal has been designed to optimise amenity, minimise its impacts and be complementary to the future character of the area as detailed in Section 6.1.

5.4.3 Height

Clause 4.3 of the WLEP sets out maximum building heights for buildings. There is no prescribed maximum height for the site, which also indicates the capacity of the site and surrounding area to accommodate taller building forms.

The proposed development includes a range of building heights, from 3 to 12 storeys, with a maximum height of RL 193.6 or a maximum of 39 m (including lift overrun) on the eastern building.

Given the context of the development, the proposed height is considered appropriate for the site. Section 6.1 further assesses the suitability of the proposed height for the subject site.

5.4.4 Other matters

Relevant Clause	Comment	Compliance
Acid Sulphate Soils	<p>Clause 6.1 relates to acid sulphate soils and seeks to ensure that development does not disturb, expose or drain acid sulfate soils and cause environmental damage. The site is not identified as being affected by ASS. However, the pre-DA meeting minutes require this clause to be addressed given the likely depth of the basement.</p> <p>The Preliminary Site Investigation Report did not identify the presence or likely presence of ASS on the site.</p>	Yes
Demolition	<p>Clause 7.7 of the WLEP states that demolition requires consent. The proposal includes the demolition of the existing warehouse onsite. Demolition methodology is outlined in the Construction Management Plan at Appendix 20 and waste management addressed in the Waste Management Report at Appendix 14.</p>	Yes

Relevant Clause	Comment	Compliance
Earthworks	<p>Clause 6.2 of the WLEP seeks to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes, neighbouring uses, cultural or heritage items or features of the surrounding land.</p> <p>The site will be excavated in part in preparation for the construction of the basement carpark. A Geotechnical report prepared by Douglas Partners accompanies the SEE (Appendix 18) and confirms that the excavation will be 6 to 8 m deep. During the bulk excavation, temporary batters or shoring will be required to support the basement excavations.</p> <p>The likely impacts associated with the proposed earthworks such as runoff and impacts on surrounding properties can be appropriately managed through the application of standard construction management procedures.</p>	Yes
Development on sloping land	<p>Clause 6.4 identifies land which is at risk of landslip. The site is identified as part Area A and part Area B in the landslip risk map.</p> <p>The Geotechnical report details the site requires 6 to 8m of excavation to accommodate the basement carpark. If space permits, temporary batter slopes of 1.5H:1V could be left in the filling. If space does not permit, shoring would be required to support basement excavations.</p>	Yes

Table 11: Other matters in the WLEP 2011

5.5 Warringah Development Control Plan 2011

The proposal is generally in compliance with the aims, objectives and key provisions of the DCP. In areas of non-compliance the proposal has been well justified as detailed in this SEE.

A detailed assessment of the proposal against the relevant provisions of the DCP is provided at Appendix 23.

5.6 Voluntary Planning Agreements

There are no voluntary planning agreement(s) relating to this DA.

5.7 Environmental Planning and Assessment Regulations 2000

There are no known matters prescribed by the *Environmental Planning and Assessment Regulations 2000* (EP&A Regulation) that are relevant to the consideration of this application. The proposal is compliant with the Building Code of Australia (BCA).

6 Environmental Planning Assessment

Section 4.15(1)(b) of the EP&A Act requires an assessment of the impact of development on environmental impacts (natural and built), and social and economic impacts.

6.1 Built Form

The built form and design of the proposed buildings has been informed and driven by a range of design studies that were undertaken in collaboration with Matthew Pullinger, Architect. The studies, including an Alternative Massing Study, established a clear urban design structure for the site.

The proposed development comprises 2 separate buildings ranging from 3 to a maximum 12 storeys and a range of commercial uses on the ground floor with seniors living apartments (independent living) and associated common areas above.

The site has no relevant FSR or maximum height of building development standards. Therefore, the proposed built form and its scale has been determined through urban design analysis and on the following design principles.

Design Principles

To formulate the most appropriate built form outcome which maximised amenity and ensured good design outcomes, a series of design principles were developed in collaboration with Matthew Pullinger following the meeting with Council's DSAP and utilised in developing the current proposal. These design principles are as follows:

1. Acknowledge and respond to recent residential approval and context of the surrounding land uses
2. Retain existing vegetation boundary
3. Perimeter block form with generous central landscaped open space
4. Provide generous setbacks and building separation
5. Maximise landscaped area and deep soil
6. Minimise building height impact by appropriately locating taller building forms
7. Enhance pedestrian movement, address and access
8. Ground level uses to enhance activation

Siting and massing study

An early version of the proposal was presented to Council's DSAP, which encouraged the adoption of a 'landscape-led' design strategy, and achievement of outcomes exceeding the standards set out in the ADG.

In response to the DSAP comments, a series of alternative siting and massing strategies were prepared and investigated in collaboration with Matthew Pullinger, each of which maintains the proposed yield but examines the relative strengths and weaknesses of each strategy. Each siting and massing strategy was developed using the design principles outlined above and assessed for its positive and negative design outcomes to determine the best possible built form.

Council suggested an alternative massing strategy including a linear building along the southern boundary. This has been considered in the comparative analysis but discounted for

two primary reasons: the strategy increased off-site shadowing impacts and raised a difficulty in achieving acceptable minimum levels of solar access to proposed residential units (given that a large number result in a southern orientation).

The subsequent detailed proposal, the subject of the DA, emerged from this comparative analysis, as detailed below.

Overview of proposal

The preferred siting strategy provides the following favourable design features:

- increased setbacks to the southern and western boundaries (retaining perimeter vegetation)
- a perimeter block form created to resolve the relationship to the approved development on Frenchs Forest Road and enhance amenity. Design is integrated with the approved development, residents of which will look into an extensive piazza
- a significant, publicly accessible, central courtyard space (over deep soil) is created, with strong visibility from Skyline Place
- non-residential commercial or communal uses are located at ground level to activate the courtyard and Skyline Place
- two taller built form elements are diagonally opposed to maximise building separation, views and outlook, and to minimise off-site impacts

The proposed massing and siting strategy is shown in Figure 11 below.



Figure 11: Proposed massing and siting strategy (Source: PA Architect Studios)

Height

The proposed building heights range between 3 to 12 storeys. The tallest proposed building element is 12 storeys, which occupies only a small portion of the site (16.9% of the total site area) and is generally consistent in context with the changing character of the surrounding area. This element has been located such that it will have no adverse impacts by way of overshadowing or overlooking, on the surrounding area or visual impact.

The proposed height for the mixed use seniors living development is appropriate for the site given its surrounding context. An assessment of surrounding development approvals in Frenchs Forest has demonstrated that the proposal is consistent with the current height trends in the locality as shown in Figure 12 and Figure 10 below.

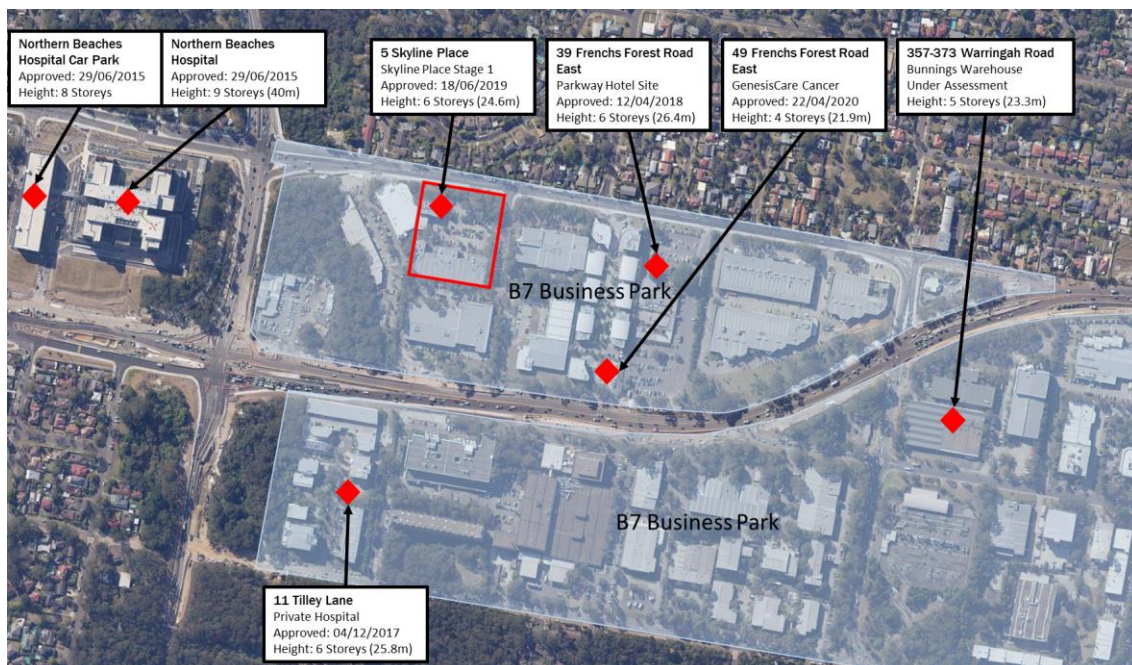


Figure 12: Surrounding development approvals within Frenchs Forest (Base source: Sixmaps)



Figure 13: Emerging built form context (Source: PA Studio)

The scale of the approved development (Lot 2) has informed the current proposal. The scale of the approved development is reflected and reinforced by the building forms of the proposed development immediately south along Skyline Place and again in the southwest corner of the site. The taller buildings have been located in less visually prominent positions on the site that will have minimal impact on the surrounding area. These buildings are effectively screened when viewed from the north of the site by the existing mature vegetation, the approved development, the substantial distance from Frenchs Forest Road and by the low scale residential uses north of the site (Figures 11 to 14).

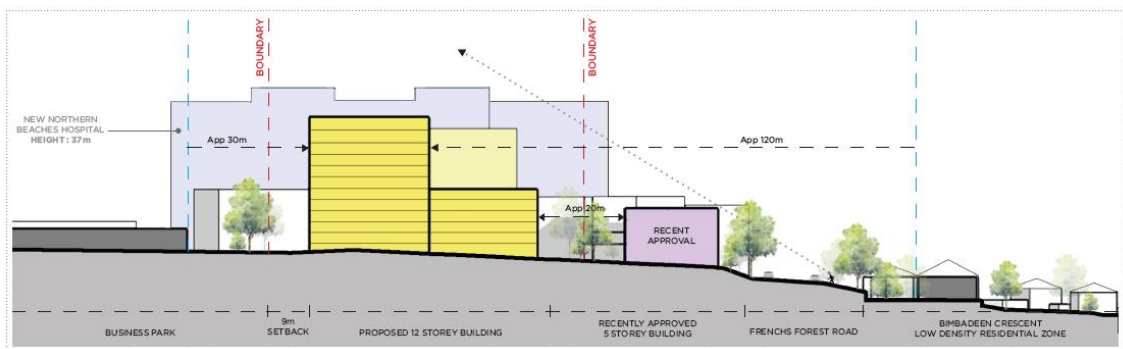


Figure 14: Height Assessment – surrounding approved built form (Source: PA Studio)

Whilst the scale of the approved development has informed the current design, it is not considered a precedent for setting a maximum building height in the current proposal. The approved development occupies the frontage to Frenchs Forest Road and therefore is far more visually prominent and has a more direct interface with the low density residential development to the north. As noted above, the current site is situated a substantial distance

from these more sensitive receivers and the design ensures the tallest buildings are located in less visually prominent parts of the site.

There are strong operational and functional relationships which result in a distinct physical building separation. However, the façade design incorporates the following measures to minimise expansive unbroken façades:

- there is a very strong vertical and horizontal articulation provided between the two united elements fronting Skyline Place.
- vertically the two forms are visually separated by a deep and wide recess coinciding with windows providing natural light and air to the common circulation corridors.
- horizontally the tower form is set back an additional 4.9 m from Skyline Place

Given the need for functional connectivity and a desire to create a floor-by-floor sense of community, the strong articulation between the 12 and 6 storey forms is an effective response which breaks down the apparent bulk and scale of the proposal.

The existing mature large canopy trees will be retained on the site, which in combination with the gently undulating topography and the location of the proposal behind the approved development on proposed Lot 2, will also minimise the impacts of the proposed building heights.



Figure 15: Indicative photomontage from Frenchs Forest Road (Source: PA Studio)

It is also important to note that the DSAP's comments to maximise on-site open space, as well as the proposed inclusion of 22 affordable dwellings, need to be balanced with the commercial imperative to ensure the development's suitability, which has also driven taller building forms on the site. However, the design analysis outlined above and below and described in detail in the Design Report (Appendix 3), demonstrates that the proposed heights can be appropriately accommodated on the site whilst achieving superior design outcomes and minimising any impacts on the surrounding locality.

Visual Impacts

There is generally low visibility to the site from surrounding areas, given the locality's topography and existing buildings. The site is setback approximately 60 m and 105 m from Frenchs Forest Road East and Warringah Road respectively. The existing buildings and the approved development on proposed Lot 1 also contribute to blocking views to the site. Furthermore, the steep slope away from Frenchs Forest Road East to the north also minimises visibility of the site.

The visual impacts of the proposal within the local area when assessed from key vantage points are therefore minor, particularly from the more sensitive low density residential uses immediately to the north of the site as shown in Figure 16 below. The Design Report (Appendix 3) also includes a view analysis demonstrating that the proposed development has negligible impacts to surrounding developments.



Figure 16: View of proposed development as seen on Bimbadeen Crescent, residential area north of Frenchs Forest Road (Source: PA Architect Studios)

The proposal incorporates a landscape-led siting strategy to assist in creating a cohesive development within the existing streetscape. This also assists in mitigating any perceived visual impacts from key public vantage points.

Overshadowing and Solar Access

The overshadowing impacts on neighbouring properties are minimised and are within acceptable limits that do not constrain their future development.

Overshadowing diagrams demonstrate that surrounding developments receive adequate solar access in accordance with the ADG. Similarly, the centralised piazza space receives good solar access encouraging residents to utilise the area.

The development has been designed and sited with diagonally opposed tower forms which reduces overshadowing impacts to surrounding development and provides good solar access to units and provided communal open space. The solar analysis demonstrates the proposal's northern orientation, and the courtyard itself, will receive excellent solar access in exceedance of the ADG guidelines.

ADG Compliance

Notwithstanding that SEPP 65 and the ADG do not apply to the proposal, a detailed assessment of the proposed development against the provisions of the SEPP and ADG has been undertaken. This assessment and the Design Verification Statement demonstrate that the proposal generally far exceeds the ADG design criteria (Appendix 3). The following summary demonstrates that the proposal greatly exceeds the ADG design criteria, which demonstrates the superior design and amenity outcomes of the proposal:

- 90% of living rooms and private open spaces receive 2 hours of sunlight between 9am and 3pm at mid winter (the ADG recommends a minimum of 70%)
- 10% of apartments receive no direct sunlight between 9am and 3pm at mid winter (the ADG recommends a maximum of 15%)
- 83% of apartments are naturally cross ventilated in the first 9 storeys of the building (the ADG recommends a minimum of 60%)
- 28% of the site is provided as communal open space (the ADG recommends a minimum of 25%)
- 76% of sunlight to communal open space (the ADG recommends a minimum of 50%)
- Units per corridor:
 - 12 units rely on a single corridor (consistent with the exception to Design Criteria 1)
 - each building is serviced by two lifts ensuring compliance with maximum number of apartments sharing a single lift (eastern building - 61 apartments, western building - 62 apartments)
 - the proposed corridors are consistent with the design guidance and provide a high level of amenity as:
 - the proposal exceeds the recommended sunlight and natural cross ventilation in apartments
 - ample daylight is provided to common circulation spaces
 - space is available within the common areas for seating and gathering
 - generous corridors widths for incidental social gathering are provided
- Building separation which exceeds the ADG recommendations as follows:
 - a minimum of 18m separation is proposed between the approved and proposed developments (refer to Appendix 1 Architectural Plans)
 - a minimum setback of 7.6 m is proposed to Skyline Place
 - a minimum setback of 9m is proposed to the southern and western boundaries
 - a minimum of 34 m separation is proposed between the eastern and western buildings within the site (refer to Appendix 1 Architectural Plans)
- 36% of the site is deep soil zone (the ADG recommends a minimum of 7%)

6.2 Open Space, Public Domain and Landscaping

The objectives of the proposed landscaping scheme are to ensure it contributes to the bushland character of the surrounding area, providing functional and high quality open space areas, providing planting and open space with an appropriate scale, and retaining any significant trees onsite. Broadly, the landscape scheme incorporates mulching, synthetic turf, paving, turf, decomposed crushed granite, canopy trees, deciduous trees, seating and the retention of existing trees onsite.

The scheme provides 5,252m² (42% of total site area) of landscaped area with 2,188m² of this being communal open space. This provision far exceeds the recommendations set out

in the DCP and the ADG for landscaping and open space. A Landscape Plan prepared by Space Landscape Designs is attached at Appendix 4.

Extensive landscaping is proposed to the centralised open space area to provide a publicly accessible piazza. The piazza creates an inclusive space for passive recreation that will also include community gardens for resident use and a children's play area and open turf area to encourage family and friends to visit. The pathways provided throughout the piazza area add to the walkability of the development, including ramps so that the area is accessible to all. The function of the piazza is to act as a central meeting place which ensures cohesion between the proposed development and the approved development on the adjoining site to the north. Extensive canopy planting has been provided in the setbacks to ensure some level of privacy when visiting the piazza space.

6.3 Traffic and Transport

A Traffic and Parking Assessment Report (TPA) has been prepared by Varga Traffic Planning and is provided (Appendix 9). The TPA assesses the existing and proposed traffic conditions, traffic generation, car parking, bicycle parking and public transport accessibility. Key findings of this assessment are summarised below.

Traffic Generation

The TPA confirms the proposed development will not have any unacceptable traffic implications in terms of road network capacity and that no road improvements or intersection upgrades will be required as a consequence of the proposed development. Table 12 below shows the estimated maximum traffic generated by the proposal.

	AM	PM
Seniors living apartments (135 dwellings)	14 vph	41 vph
Commercial tenancies	18 vph	18 vph
Total Traffic Generation Potential:	32 vph	59 vph

Table 12: Projected future traffic generation

Based on the cumulative floor area of the existing buildings, the site is found to have an existing traffic generation potential of 1.67 peak hour vehicle trips per 100m² during the morning peak period and 1.39 peak hour vehicle trips per 100m² during the afternoon peak period.

Table 13 below demonstrates the estimated net reduction of traffic generation as a consequence of the development proposal.

Traffic generation potential	AM	PM
Projected future traffic generation potential:	32 vph	59 vph
Less existing traffic generation potential:	-81 vph	-68 vph
Total Traffic Generation Potential:	-49 vph	-9 vph

Table 13: Projected net reduction in peak hour traffic generation potential

The TPA concludes the proposal is consistent with the Northern Beaches Hospital Transport Study and will not have any unacceptable traffic implications on road network capacity and that no road or intersection upgrades will be required.

Car Parking

The proposal provides for sufficient car parking for the commercial/retail component of the development to fully comply with Council's car parking rates.

As described in Appendix 9, the residential component of the development is consistent with the parking requirements of the Seniors SEPP.

The majority of the on-site parking is provided in a new two-level basement car parking area, with vehicular access provided via Skyline Place (via the entry ramp and basement car park on the approved development on proposed Lot 2) and a new exit ramp at the southern end of Skyline Place.

A total of 232 car parking spaces are proposed, of which:

- 172 car parking spaces are allocated to the seniors living residents (as per the Seniors SEPP)
- 34 spaces are allocated to the visitors of the seniors units
- 26 spaces are allocated to the commercial spaces

A drop-off bay containing 2 spaces is also proposed adjacent to the building's main entrance on Skyline Place. There are also 3 car spaces proposed at-grade, off the approved private road on Lot 2, including 2 disabled parking spaces. These spaces can also be used by ambulances. The proposed car parking associated with the development therefore fully complies with the applicable controls.

As detailed in Section 3.1, it is proposed to include three additional at-grade parking spaces (resulting in a total of 5 spaces) adjacent to the two-way access drive and to reconfigure the spaces from parallel to perpendicular on proposed Lot 2.

Section 3.1 also details the proposed amendment to the approved Lot 2 DA to provide for consolidated access to the provided onsite basement car parking.

Service Vehicles

Service vehicle facilities are provided within the site and are accessed by the proposed internal driveway via Skyline Place. The TPA confirms Council's waste vehicle and vehicles up to 8.8m long MRV trucks can enter and leave the site in a forward direction.

Public Transport Accessibility

As discussed in Appendix 9, the site is within 100m walking distance to regular bus services which provide access to a variety of shops and specialised services throughout the week. A bus stop is located immediately to the north of the proposal on Frenchs Forest Road.

It is anticipated the bus routes and services within the Frenchs Forest precinct will further improve with the establishment of the Northern Beaches Hospital and the possible future expansion of the Rapid Bus Network.

The TPA concludes the proposed development will not have any unacceptable implications in terms of road network capacity or off-street parking, loading or access requirements.

6.4 Noise and Vibration

An Acoustic Report (AR) has been prepared by Acoustic Logic and is provided at Appendix 10. The AR considered the potential acoustic impacts of the development on the closest sensitive receivers and noise intrusion from the existing environment of the proposed development. The key findings of the AR are summarised below.

External Noise Intrusion

The AR states that nearby light industrial uses do not generate significant noise during the day, evening or night. Rather, the main noise source is traffic noise from Frenchs Forest Road, which is approximately 60m north of the site. The AR has considered the impacts of existing uses operating on adjoining sites and found the required noise levels inside the residential accommodation can be achieved.

The AR confirms that while the traffic movements on Frenchs Forest Road East will have some impact on the proposed development, traffic noise is already in excess of the criteria in Australian Standard AS 3671:1989 'Acoustics – Road traffic noise intrusion – Building siting and construction' and Australian Standard AS 2107:2016 'Acoustic – Recommended design sound levels and reverberation times for building interiors'. The Policy states in these cases, the primary objective is to reduce the existing level through feasible and reasonable measures.

The maximum internal noise criteria are summarised in Table 14 below.

Space/Activity Type	Maximum Internal Noise Criteria
Sleeping Areas	35 dB(A) _{Leq(9 hour)}
Living Areas	40 dB(A) _{Leq(15 hour)}

Table 14: Summarised maximum internal noise criteria (Source: Acoustic Logic)

Location	Summary of Measured Existing Traffic Noise Level	
	Daytime	Night Time
5 Skyline Place (Monitor 1)	61 dB(A) _{Leq(15 hr)}	51 dB(A) _{Leq(9 hr)}
	62 dB(A) _{Leq(1 hr)}	55 dB(A) _{Leq(1 hr)}
22 Frenchs Forest Road East	61 dB(A) _{Leq(15 hr)}	57 dB(A) _{Leq(9 hr)}
	64 dB(A) _{Leq(1 hr)}	61 dB(A) _{Leq(1 hr)}

Table 15: Summarised traffic noise levels (Source: Acoustic Logic)

As demonstrated in Table 15, the existing traffic noise levels are well in exceedance of the maximum internal noise criteria. Acoustic Logic have recommended the following construction measures to mitigate the impact from external noise intrusion:

- Glazed Windows and Doors – aluminium frames doors and windows will be satisfactory provided they incorporate glazing of 6mm

- Roof/Ceiling Construction – constructions of masonry system will be acceptable without any additional treatment
- External Wall Construction – constructions of masonry system will be acceptable without any additional treatment

The proposed development incorporates all above mitigation construction measures to ensure that all external noise impacts to seniors living units are acoustically acceptable.

Operational Noise Emissions

Noise sources from general operations of the site typically include mechanical plant noise from air-conditioning equipment and exhaust fans servicing the development and outdoor & indoor communal areas. The measured noise levels demonstrate that the development complies with relevant noise criteria.

The AR considered the worse-case scenario to predict the noise impacts of the proposal on the nearest sensitive receivers including residential properties to the north of the site across Frenchs Forest Road. The AR considers the nearby residential properties will not be adversely affected through the operation of the proposed development, given the background level of noise generated from Frenchs Forest Road. Noise mitigation measures will be further considered at the design development stage to ensure compliance at the nearest sensitive noise receivers is achieved.

6.5 Waste Management

A Waste Management Plan (WMP) prepared by Platino Properties accompanies the DA (Appendix 14). The WMP addresses construction and operational waste in accordance with Council's DCP.

The key construction and operational waste measures proposed in the WMP include:

- Demolition and construction waste will be appropriately disposed of.
- The residential storage area is located on Basement Level. Commercial tenants will be responsible for storage and disposal of own waste.
- The residential waste storage rooms are connected to garbage and recycling chutes that are accessible on each residential floor.
- Separate bins for general, paper, bottle and vegetation residential waste are proposed.
- Waste trucks will enter the site via the new internal driveway road connecting to Skyline Place.
- Residential waste collection assumed to be on a weekly basis.
- Council's waste collection vehicle will collect waste.

The proposal can be effectively managed and will not result in any adverse impacts.

6.6 Stormwater Management

The Civil and Stormwater Report is provided in Appendix 19 and outlines that the proposal incorporates an On Site Detention (OSD) system located in the ground level basement level, with a pump out system within the basemen.

The Report also proposes sediment control measures to minimise run off from the site.

6.7 Economic and Socio-economic

6.7.1 Economic benefits

An Economic Impact Assessment (Economic Report) has been prepared by HillPDA and provided at Appendix 5. HillPDA found the proposal is consistent with the types of development within strategic centres and innovation precincts as per the District and Regional Plans. Specifically, the proposal will support the transition of Frenchs Forest business park into an innovation precinct, consistent with these plans.

The Economic Report makes the following key findings:

- the site comprises 1.2% of the Frenchs Forest Business Park B7 Zone (7,800 m² site compared to 56.5 hectares of B7 zone land)
- the Business Park is currently underutilised and has potential for increased employment
- the Business Park can transition into a more efficient and higher order health and education precinct with a focus on supporting higher commercial and office uses
- the Business Park has sufficient capacity to reach its employment targets
- the use of the site for seniors housing with associated employment in accordance with the Seniors SEPP will likely have no effect on the employment objectives of the Business Park
- the proposal would increase employment on-site from 44 to 81 jobs, representing an additional 31 jobs and an 84% increase in jobs
- the proposal will meet up to 3.4% of the Business Park's targets for additional employment to 2036, without compromising the capacity of the Park to meet these targets.

During construction

The development will ensure a number of economic benefits during the construction phase including:

- 252 direct and indirect jobs
- a total economic output of \$110 million, directly and indirectly
- contribution of \$21 million directly to the Northern Beaches economy
- \$15 million in workers wages

Post-construction

The proposed development is expected to generate a number of economic benefits for the locality and for the Northern Beaches LGA including new employment opportunities, new opportunities for residential and commercial development that will support the operation of the Northern Beaches Hospital and expanded levels of household expenditure on a wide range of retail and other services.

The post-construction economic benefits of the development are estimated to be:

- 81 jobs, 37 more than currently provided onsite
- a wage generation of \$5.5 million per annum, \$1.7 million more than current uses onsite
- a Gross Value Added (GVA) of \$6.7 million per annum, \$1.7 million more than the current uses onsite
- increase local retailers GVA of approximately \$1.6 million per annum

- increased employment density onsite
- a more orderly and efficient use of the land that aligns with State planning objectives on a site that would benefit from its proximity to the nearby Hospital

6.7.2 Housing supply and choice

The proposal will directly meet the needs and demand for supply of seniors housing within the Northern Beaches LGA. The Seniors Housing Analysis prepared by Macroplan demonstrates that the projected population growth of seniors living within the LGA necessitates the development of Independent Retirement Living facilities to meet the current undersupply (Appendix 6).

Draft Northern Beaches Housing Strategy

The Draft Northern Beaches Housing Strategy (DNBHS) identifies that the population growth within the LGA is expected to be heavily skewed to the elderly population over the next 20 years. By providing a modern and diverse range of housing within a highly accessible area close to a town centre, the proposal directly addresses the framework set out in the DNBHS.

The DRNHS demonstrates that the supply of independent seniors living aligns with the growing ageing population. There is a subsequent need to provide new seniors living product in the area to meet the undersupply.

It is also noted that the DNBHS states; *'seniors housing will require the supply of the right types of seniors housing development in the right locations'*. This relates to the provision of seniors housing near services such as retail, health and transport. Given the site is located 240m east of the Northern Beaches Hospital, 350m south-west of existing Skyline Shops and has public transport services located directly north on Frenchs Forest Road, it clearly meets the criteria for appropriate locations for seniors housing.

Gap Assessment

As noted above, the population growth within the Northern Beach LGA is expected to be heavily skewed to the older age cohort over the next 20 years. Macroplan estimates that there is a penetration rate averaging 5.9% for the 55+ age cohort.

There is estimated to be 4,427 competing seniors housing units within the Northern Beaches LGA. The future supply of seniors living units is projected to be 437 between now and 2024. Based on Macroplan's analysis, this will result in an undersupply of 386 units in 2026, rising to 1,718 in 2036 if there is no increase to future supply.

Accordingly, the proposed development will directly contribute to meeting an identified shortfall in seniors housing supply in the LGA over coming years.

Job Creation

The proposal has the ability to support local employment by increasing the available commercial floorspace. It is expected that the development will result in an 84% increase in jobs on the site following completion of construction. Additionally, it will generate 55 to 60 full-time jobs per annum over the next 3 years in the construction industry and a further 85 to 90 full-time jobs indirectly.

Post-construction, it is anticipated that employment outcome may evolve beyond the traditional B7 Business Park uses. The current uses are predominantly focused around light industry which is expected to change to health focused and innovative industries to align with the strategic planning for the Frenchs Forest precinct. A net addition of over 70 jobs per annum could be generated following the completion of the development.

Frenchs Forest will be required to provide additional commercial floorspace between 2021 to 2036. Given the development application incorporates the provision of almost 1,000m² of commercial floorspace, it will therefore contribute to future job growth. This additional commercial floorspace will not compromise the current town centre's primary role in the provision of goods and services, but will create an opportunity for local employment to evolve over time.

Other Considerations

As outlined in the Seniors Housing Analysis, the development will predominantly attract seniors who live in the vicinity of the site. Accordingly, when seniors move from their existing houses, these houses will be added to the market and increase supply for purchasers such as younger families, resulting in the provision of housing that better satisfies diverse demographic needs.

6.7.3 Social benefits

The Social Impact Report (Appendix 7) demonstrates the social benefits associated with the proposed development. The proposal will address the gaps in the seniors housing market within the Northern Beaches LGA. This is discussed further below.

Innovation in housing

The proposal creates a unique and cohesive development which co-locates senior, social and affordable housing into a fully integrated complex. Accompanied with the architectural design excellence, results in a high quality community, providing services for residents and the broader community. The development encourages social connectedness, whilst maintaining independence, with the broader Northern Beaches community through the provision of communal spaces such as the central piazza and commercial services located on ground level.

The Project Independence component of the proposal introduces a new social housing model providing housing for people with an intellectual disability. The integration of this social housing within the broader development provides those living under the Project Independence scheme independence and opportunities for social connectedness.

Demand

Given the nature of the ageing population, there is an evident demand for modern and innovative seniors housing. The proposed development provides residents with options for levels of assistance as they age. The proposal also provides services for residents to live independently. By providing commercial tenancies, including Doctor's rooms, on the ground level of the development, residents have services on their front doorstep.

A scarcity of sites within established areas that are close to existing services also impacts the ability for providers to develop seniors housing facilities. The site is nearby existing services including the Northern Beaches Hospital and Frenchs Forest Town Centre and within close proximity to public transport. This proposal provides seniors housing within an area that has a demonstrated demand.

6.8 Crime Prevention Through Environmental Design

The NSW Department of Planning and Environment Crime Prevention Legislative Guidelines encourage consideration of safety and security to users and the community in the design of developments.

The Guidelines outline the best approaches to the planning, design and structure of cities and neighbourhoods to prevent crime and create safe places/spaces and establishes four key Crime Prevention Through Environmental Design (CPTED) principles, including:

- surveillance;
- access control;
- territorial reinforcement; and
- space management.

Good planning and design can remove opportunities for crime and anti-social behaviour and is therefore a fundamental consideration in the development of a new neighbourhood and buildings.

The proposed development has been designed to create a safe neighbourhood, buildings, spaces and public domain in accordance with the four key CPTED principles.

The proposal provides for a safe environment through surveillance and activation including:

- living areas and private open spaces orientated towards the public domain and internal road (Skyline Place)
- secure entry into the building via internal lobby and basement
- concierge desk
- lighting around the entries into the building
- landscaping to distinguish public and private spaces

In light of the above assessment, the proposal is considered to be consistent with the key CPTED principles and will provide for a well-designed and safe new neighbourhood and buildings.

6.9 Environmental Sustainability

A Sustainability Report prepared by Northrop accompanies this statement demonstrating that the proposed development incorporates best practice initiatives. The proposal allows for ecologically sustainable development (ESD) principles to be implemented through the incorporation of Australian best practice sustainability initiatives and is consistent with the 4 key ESD principles, as shown in the table below:

ESD Principle	Consistency
Precautionary principle	
<p><i>...if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:</i></p> <p>(i) <i>careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and</i></p> <p>(ii) <i>an assessment of the risk-weighted consequences of various options</i></p>	<p>The proposal is supported by technical reports which conclude that there is no risk of adverse environmental impacts, subject to appropriate management, during construction and operational stages. It is considered that through adherence to the mitigation measures outlined within the technical reports, the proposal will not result in serious impact to the environment.</p>
Inter-generational equity	
<p><i>...the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations</i></p>	<p>The proposal has been developed to directly benefit current and future generations by establishing a new seniors housing development, in an important and prominent location. When complete, the development will improve the activation and vitality of the precinct. The works will not have an adverse impact on the environment.</p>
Conservation of biological diversity and ecological integrity	
<p><i>...conservation of biological diversity and ecological integrity should be a fundamental consideration,</i></p>	<p>The development site does not contain any threatened or vulnerable species, populations, communities or significant habitats. The removal of existing trees from the site will be compensated for by the high standard of public domain and landscaping treatments. In addition, construction impacts will be appropriately managed ensuring no significant indirect impacts on the surrounding environment.</p>
Improved valuation, pricing and incentive mechanisms	
<p><i>...environmental factors should be included in the valuation of assets and services, such as:</i></p> <p>(i) <i>polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,</i></p> <p>(ii) <i>the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural</i></p>	<p>The cost of infrastructure and measures to ensure an appropriate level of environmental performance on the site had been incorporated into the cost of the works. In addition, the level of waste will be appropriately managed during the construction stage.</p>

ESD Principle	Consistency
(iii) <i>resources and assets and the ultimate disposal of any waste, environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.</i>	

Table 16: Consideration of the proposal against ESD principles

On the basis of the above assessment, the proposal is considered to be consistent with the principles of ESD.

6.10 Construction Management

A Construction Management Plan (CMP) (Appendix 20) has been prepared and will be implemented throughout the entire construction phase. The CMP provides details on how the following issues will be managed throughout construction:

- pedestrian and traffic management;
- hours of construction work;
- noise and vibration;
- waste management; and
- air quality.

It is considered subject to the preparation and implementation of the CMP, that the impacts arising from the construction of the first stage of development can be mitigated and managed.

6.11 Development Contributions

The Northern Beaches Section 7.12 Contributions Plan 2019 applies to the site.

6.12 Building Code of Australia (BCA)

A BCA Compliance Report has been prepared by Technical Inner Sight and is included at Appendix 13.

The report provides an assessment of the proposed development against relevant provisions of the BCA and confirms that compliance with the BCA for the proposed works will be able to be achieved by a combination of compliance with the deemed-to-satisfy (DTS) provisions and the Performance Requirements.

The detailed design of the development will ensure that the proposal complies with the applicable requirements of the BCA or apply appropriate alternative solutions developed and verified by a qualified BCA Consultant or Fire Safety Engineer.

The design will be reviewed by an appropriately qualified person prior to the issue of a Construction Certificate for the works.

6.13 Suitability of the site

The characteristics of the site, its land use context and its location are described in Section 2 of this report. The site is suitable in accommodating the proposed redevelopment for the following reasons:

- the site is suitable for seniors housing given its proximity to the Northern Beaches Hospital and new town centre, existing transport and retail services and the adjacent approved seniors living and mixed use development;
- The proposed building heights of between 3 to 12 storeys - are broadly consistent with the nature of recent approvals in the B7 zone, and the new hospital
- the proposal will contribute to a vibrant new neighbourhood, including the provision of a mix of uses, buildings and public domain of the highest quality, and maximise the efficient use of this largely vacant parcel of land;
- the proposal will contribute to the transition of the Frenchs Forest Business Park to a Health and Education Precinct;
- the proposal will contribute to the Hospital Precinct's economic growth, housing targets and housing diversity;
- the development will foster the economic growth of Frenchs Forest, the wider Northern Beaches LGA and will support existing employment generating uses;
- the site is capable of being developed in a manner that will minimise impacts to the natural, artificial, historical, and environmental qualities of the site and neighbouring sites. All impacts of the development can be appropriately managed and mitigated;
- the development is designed in accordance with ESD principles and will achieve a high standard of sustainable design;
- the proposal is within close proximity Frenchs Forest Road which is serviced by regular bus routes and is therefore well served by public transport;
- the proposal includes the provision of a high quality landscaping, public domain and is also in close proximity to existing public open spaces and recreational facilities;
- there are no natural, physical or cultural constraints on the site or in the surrounding locality that preclude the proposed development.

Accordingly, it can be concluded that the site is entirely suitable to accommodate the nature and scale of the proposal.

6.14 Submissions

The proposal will be notified in accordance with the Council's notification policy. Council officers will consider any submissions received prior to the determination of the application.

6.15 Public interest

The proposal is in the public interest as it will achieve the following:

- additional housing choice to enable people to continue to live in their community and support networks, consistent with the objectives of the Seniors SEPP
- co-location of seniors housing with major health facilities, transport and other services
- transformation of the site with a superior architectural outcome
- additional employment opportunities on the site
- improved surveillance of the private and public domain

- extensive landscaped area in the proposed development and approved development to ensure the delivery of high quality open space and amenity to residents; and
- provision of affordable housing for women over 55
- disability housing is provided in collaboration with Project Independence. This ensures the provision of high quality seniors housing is accessible to a range of people, resulting in a diverse and cohesive development.

In addition, Council will consider any public submissions relating to the proposal during its assessment. Accordingly, at this stage, it can be concluded that the proposed development is entirely in the public interest.

7 Conclusion

This SEE supports a Development Application for the development of a seniors housing and mixed use development at 5 Skyline Place, Frenchs Forest.

This SEE has been prepared and is submitted to Council pursuant to the provisions of Part 4 of the EP&A Act. A detailed examination of the proposed seniors housing development in its legislative and physical context has found that the proposal:

- is consistent with the current legislative framework
- is consistent with the relevant strategic documents
- is suitable for the site and the area, after an assessment against the heads of consideration of section 4.15(1) of the EP&A Act
- has had regard to and is consistent with the Seniors SEPP and Guidelines
- is permissible and appropriate pursuant to the provisions of the Seniors SEPP
- has had regard to and is consistent with SEPP 65 and the ADG
- will not result in any significant land use conflicts with existing surrounding uses and is consistent with the evolving character of Frenchs Forest as it provides a mix of housing and employment uses in close proximity to Northern Beaches Hospital
- is appropriate considering the criteria for seniors housing outlined in the Draft Northern Beaches Housing Strategy
- will provide seniors housing for an ageing population in the Northern Beaches LGA in which there is an identified shortfall of suitable accommodation for seniors
- will not impact on the ability of the Business Park to reach its employment targets
- will result in an additional 31 jobs onsite, an increase of 84%
- will not lead to any adverse traffic or pedestrian safety issues
- will not result in any environmental impacts or adverse impacts on the amenity of surrounding land

Consequently, approval of this seniors living and mixed use development application is recommended.