

11 June 2021

Ms Lashta Haidari
Development Assessment Officer
Northern Beaches Council
PO Box 82, Manly NSW 1655

Attention: Lashta Haidari

Dear Lashta

5 SKYLINE PLACE, FRENCHS FOREST (DA2021/0212)

Introduction

This letter has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Platino Properties Pty Ltd* (the Applicant) in response to:

- Council's Urban Design referral
- comments from Council's Design and Sustainability Advisory Panel (DSAP) received in relation to DA2021/0212
- Council's Water Management referral comments relating to rainwater tanks (please note a further submission will be made under separate cover addressing all issues raised in this referral)

A detailed response to issues raised by DSAP and Council's Urban Design referral is provided at Attachments A and B, with additional supporting information at Attachments C to R.

Please note that the following information, prepared in response to issues raised, is submitted as part of an amended development application and discussed further in this submission:

- Solar Access Analysis (**Attachment D**)
- Revised Design Report (**Attachment E**)
- Revised Landscape Plans (**Attachment F**)
- Wayfinding and Signage Strategy (**Attachment G**)
- Sustainability Strategy (**Attachment H**)
- Revised Architectural Plans (**Attachment N**)
 - Drawing DA201, Issue B, Lower Basement Carpark
 - Drawing DA202, Issue B, Basement Carpark
 - Drawing DA203, Issue B, Ground Floor Plan
- Enhanced BASIX Certificate (**Attachment P**)
- Enhanced NATHERS (**Attachment Q**)

Whilst we acknowledge the importance of the issues raised in the comments received from Council and the DSAP matters – and hence have provided a comprehensive response in this letter – we submit that these issues should be considered in conjunction with the substantial social and economic benefits of the proposed development, consistent with the Objects of the

Environmental Planning and Assessment Act 1979 (EP&A Act), the matters for consideration under section 4.15 of the EP&A Act and the aims of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors SEPP).

In this context, our client wishes to reiterate that the proposed seniors living development at Skyline Place is a best practice design that is based on a detailed design analysis of the site and locality, extensive market research and consultation with service providers and other stakeholders.

The result is a development that incorporates innovative features that are above and beyond regulatory requirements and that are aimed at providing a great place for seniors to live, and the ability for them to be cared for in their own homes as their needs change or increase. In this regard, although not legally required, the proposal incorporates 22 units for affordable and disability housing, equivalent to 17% of the total number of dwellings.

The scale of the proposed development, which we clearly demonstrate in this letter would have no adverse visual or amenity impacts, enables the inclusion sufficient “standard” independent living apartments to cover the financial cost of delivering the 22 affordable and disability housing units, whilst also facilitating the provision of concierge, bus and car share and home care services that cannot otherwise be provided economically.

A detailed submission for Platino Properties addressing the vision and social and economic benefits of the proposal is included at **Attachment C**.

Response to DSAP and Urban Design Comments

In addressing the comments received from the DSAP and Council, a detailed response to all issues raised in each referral is contained in **Attachment A** and **Attachment B** respectively and summarised below. These responses clearly demonstrate that the proposed built form and scale is supportable on planning, urban design grounds, social and economic grounds.

1. The proposed development results in a high quality urban design outcome with no significant adverse impacts and as such a reduction in scale is not warranted:

- The proposed built form is based on detailed design principles that were developed in collaboration with Matthew Pullinger Architect, following the meetings with Council’s DSAP.
- The form of the proposed development has minimal impacts, in terms of overshadowing or overlooking, on surrounding areas. The diagonally opposed tower forms reduce overshadowing impacts to surrounding development and provide for good solar access to units and communal open space. The central courtyard space receives high levels of solar access at all times of the year.
- The detailed visual impact assessment submitted with the DA demonstrates that the proposed built form is not visually prominent given its siting behind the stage 1 approved development, its location away from Frenchs Forest Road and Warringah Road, and screening from existing vegetation and rising topography. We note the DSAP demonstrated their agreement with the findings of this assessment through their comment that **“tower forms are screened from most of the public domain.”**
- The solar analysis demonstrates that there is no difference in overshadowing of the central courtyard created by the proposed 12 storey scheme over a 6 storey building form (**Attachment D**).
- The proposal meets or exceeds all key relevant targets in the SEPP, ADG and DCP, as demonstrated in the updated Urban Design report at **Attachment E**. In summary:

COMPLIANCE TABLE SUMMARY	Proposal	Requirement
Amenity Issues	ADG, DCP, SEPP seniors	ADG, DCP, SEPP seniors
Solar Access	78%	Minimum 70%
South Facing units (no solar access)	2%	Maximum 15%
Cross Ventilation (ADG)	86%	60%
Apartment Sizes		
3 bed	Average area – 131 m ²	Minimum - 90 m ²
2 bed and 2 bed + study	Average area – 108 m ²	Minimum – 70 m ²
1 bed	Average area – 63 m ²	Minimum – 50 m ² m
Balcony Sizes	3 bed	
	Average area – 20 m ²	Minimum – 12 m ²
2 bed + study	Average area – 15 m ²	Minimum – 10 m ²
1 bed	Average area – 9 m ²	Minimum – 8 m ²
Common Internal Spaces for Residents	1,229 m ²	Nil
Roof Top Outdoor Garden (North Facing)	155 m ²	Nil
Building Separation (Central Court)	39m & 34m	18m
Landscaping & Communal Spaces		
Communal open space including outdoors common roof deck	65% of site area	25% of site area
Landscape ADG	42%	33% minimum
Deep Soil ADG	35%	15% minimum
Landscape DCP	42%	33% minimum
Landscape SEPP Seniors	67%	30% minimum
Affordable Housing		0% required
No. units	22/17% of total units	0% required
Sustainability		
BASIX - Energy	Score of 35	Score of 25
BASIX - Water	Score of 41	Score of 40
NATHers	7 Star + Average	5 star minimum (Basix)
Greenstar Design and Build Rating	5 Stars - Australian Excellence	No requirement
Greenstar Communities Rating	5 Stars - Australian Excellence	No requirement

- We strongly disagree that the proposal would set an adverse precedent for land use or built form in the locality or indeed that this is a material consideration to the current DA. Specifically:
 - the proposal must be considered in the context of its locational attributes, merits and demonstrable minimal impact, rather than a theoretical comparison to potential future development in other parts of the locality.
 - there are no height or FSR controls that apply to the site or locality and, therefore, the proposal is not in breach of any such controls. It cannot be reasonably argued that the proposal would create an impact in terms of built form precedent on adjoining sites when there are no applicable controls aimed at limiting the height or FSR of development in the locality.
 - the proposal is permissible under the provisions of the Seniors SEPP and any future DAs for seniors housing on other sites would be subject to a full merit assessment; other forms of residential development are prohibited in the B7 zone.

Similarly, the previous approval of a predominantly 6 storey built form on Lot 2 does not set a precedent height limit to be considered in the assessment of the current DA. The current DA must be assessed on its individual merits and on the basis of the Lot 1 site context, which is located away from Frenchs Forest and lower density residential development to the north. Regardless, the proposal adopts a prevailing 6 storey datum across the majority of the site, which clearly relates to the scale of the Stage 1 approval yet responding to its more centralised location away from streets and low-scale residential development.

We also note that in approving the Sydney North Planning Panel, in its approval of the Stage 1 DA noted that the *“the precinct is under transition, and includes the recently completed 8 storey Northern Beaches Hospital.”* The current proposal has a maximum height of 39.3 m (RL 196.7), which is slightly lower than the hospital (40.7m/RL 196.7) and is therefore compatible with the evolving built form character of the locality, typified by the hospital and other recently approved developments such as the Parkway Hotel.

The following supplementary information has been also prepared in response to specific DSAP comments and submitted in support of the DA:

Revised Landscape Plans (Attachment F)

The updated landscape scheme responds to comments made by DSAP. Key elements include:

- provision of a legible pedestrian circulation network that connects the laneway/entry plaza to the broader public realm and building lobbies,
- all lobbies clearly defined
- through-site links which provide connections within the site and to the approved development on Lot 2, Frenchs Forest Road and Skyline Place
- enhancing the bushland setting by providing endemic planting in deep soil setbacks at boundaries
- providing spaces for a variety of activities within the central courtyard space, including lawn/passive areas, dog off leash area, play area and gardens

Wayfinding and Signage Strategy (Attachment G)

A wayfinding and signage strategy has been developed to respond to DSAP's concerns regarding navigation of the varying spaces within the proposal. The wayfinding and signage strategy includes:

- clear identification of primary vehicular and pedestrian entries to the site
- a range of identification signs, multi-directional signs and operational overlays at each entry point and throughout the common and open spaces across the site.

Sustainability Strategy (Attachment H)

The Sustainability Strategy includes commitments to:

- an energy score of 35 against a target of 25 as measured by BASIX
- an average 7 Star NatHERS Rating
- 5 Star Greenstar Design and Build 'Australian Excellence'
- 5 Star Greenstar Communities Rating 'Australian Excellence'
- water Score of 41 against a Target of 40
- provision of a 65,000L Rainwater tank on site
- 90kW solar system on site
- reduction of potable water consumption by 24% through the application of Water Sensitive Urban Design (WSUD) principles

Revised Architectural Plans (Attachment N)

The following revised plans are submitted as part of the amended DA:

- Drawing DA201, Issue B, Lower Basement Carpark
 - addition of 65,000L rainwater tank with riser for overflow (to address comments made by Council's Water Management referral)
- Drawing DA202, Issue B, Basement Carpark
 - addition of OSD Tank (to address comments made by Council's Water Management referral)
 - provision of end of trip facilities including bathroom and 12 bike parking spaces
- Drawing DA203, Issue B, Ground Floor Plan
 - tenancy in north-eastern corner of building split into two to provide an additional tenancy, consisting of a café/restaurant and a neighbourhood shop
 - this plan has been updated to address DSAP's request for identification of uses to be provided within the commercial tenancies on ground floor

It is noted that Council was unable to provide a relevant staff member to consult with the applicant regarding the preparation of the Sustainability Strategy, as had been requested by the DSAP. The Strategy has therefore been prepared without the input by Council.

2. The proposal demonstrates a high quality social outcome through the provision of seniors housing and affordable and social housing:

- The proposed independent seniors living units aligns with the growing ageing population in the Northern Beaches LGA and the need to increase the supply of seniors housing in locations with good access to major health facilities, transport and other services, as identified in the *North District Plan, Northern Beaches Local Strategic Planning Statement* and *Draft Northern Beaches Housing Strategy*.
- There is no requirement to provide for any affordable housing as part of the development, however the proposal provides equivalent to 17% of all units as affordable and disability housing which considerably exceeds the Northern Beaches Affordable Housing Policy target of 10% for new developments. This includes affordable housing for older women (over 55) at risk of homelessness and housing for those with an intellectual disability to be provided in collaboration with Project Independence.
- Supplementary social impact advice from Chris Faulks, Deputy Chancellor, University of University of Canberra, (**Attachment I**) outlines the following key points:
 - There is a clear need for additional affordable and social housing in the Northern Beaches. In 2020, unmet demand for affordable and social housing across the

Northern Beaches was estimated to be 8,100 dwellings with a projected demand for 2,000 more by 2036.

- The issue of who will provide the dwellings to meet this demand remains unresolved and the 'funding gap' between affordable and private market housing needs to be addressed. There is a justifiable rationale for offering developer incentives to stimulate private sector investment in affordable and social housing, given the clearly evident funding gap.
- Development of the scale proposed will enable the applicant to cross-subsidise the affordable and social housing components of the project. The developer cannot deliver the 22 affordable housing and housing for people with a disability unless the development is approved in its current form.
- the proposed development does not result in any increase in allowance for profit and risk to the developer above that of the approved DA on Lot 2.
- Both *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (Seniors SEPP) and *State Environmental Planning Policy (Affordable Rental Housing) 2009* (Affordable Rental Housing SEPP) include bonus floor space incentives for development to provide a minimum of 10% of dwellings as affordable. These incentives clearly contemplate the development of larger buildings to provide an economic incentive to provide for affordable housing. While these incentive provisions do not apply to the subject development at Skyline Place, the inclusion of the affordable and social housing in the subject development is consistent with the policy intent. The amount of proposed floorspace over that approved on the adjoining site (which has no affordable housing) is roughly commensurate with the incentive offered under the SEPPs.
- Any conditions seeking a reduction to the scale of the development would result in the affordable and disabled housing components being foregone. This would be a poor planning outcome given we have clearly demonstrated that proposed scale of the development will not result in any adverse impacts and that the significant social benefits of this form of housing would also be foregone.
- Furthermore, the location of the proposed affordable and disability housing units has been selected due to the following key benefits:
 - Located adjacent to the community facilities and communal open space , including a large external communal terrace
 - Is the only accommodation proposed at ground level with gardens
 - Is fully supported by Project Independence (refer to supporting correspondence at **Attachment M**)

3. The proposal is designed to meet and exceed market demand for high quality and affordable seniors housing with market-leading facilities:

The proposal seeks to provide a form of seniors housing that is both affordable and tailored towards market demands and preferences for on-site services. The reports by Knight Frank (**Attachment J**) and Zinnia (**Attachment K**) outline how the proposal meets these market demands. In summary:

- The proposal caters for the clear market preference for a range of community and social facilities to be provided on site through the inclusion of an extensive range of facilities such as gymnasium, swimming pool, café/restaurant, meeting spaces etc.
- The development has sufficient scale for the economic provision of services. Knight Frank estimates that the optimal number of units in this regard is in the range of 150 to 200 units.
- The provision of homecare services for residents, as proposed, has a number of other benefits including:

- encouraging residents to remain active and take a proactive approach to health and wellbeing,
- delivering homecare services in a centralised location achieves a greater level of consistency in care-service staffing, ensuring residents have a regular, dedicated team of care workers familiar with them and their needs. People stay in over 60's communities longer than they would in their own home, reducing the pressure and costs on residential aged-care beds
- increased level of safety and security for residents in over 55's communities

4. Project Feasibility:

The proposed built form results from two key elements:

- urban design analysis and assessment of merit / impacts, and
- economic feasibility

The applicant has engaged HillPDA to undertake an independent review of the viability and feasibility of the proposed development (**Attachment L**) which concludes:

- The development cannot deliver the 22 affordable and disability housing units without the proposed quantum of seniors living units because these ILUs fund the cost of incorporating the affordable and disability housing apartments.
- By delivering a leading-edge model for 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, the additional floorspace is required to deliver an industry standard feasible return.

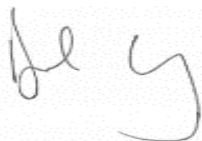
Conclusion

This submission provides a detailed response to comments raised in Council's Urban Design referral and DSAP report. It clearly demonstrates the unique and significant social and economic benefits of the proposal, as well as the high quality urban design outcome with no significant adverse impacts.

We trust that this submission will be considered by Council in finalising its assessment of the DA and ensure that all relevant DA documentation and the provisions of the Seniors SEPP are properly considered in this assessment.

Please do not hesitate to contact Dan Keary on 8459 7511 if you wish to discuss any aspect of this submission.

Yours sincerely



Dan Keary BSc MURP MPIA
Director

Attachments:

Attachment A:	Response to issues raised by DSAP (Keylan)
Attachment B	Response to issues raised by Council's Urban Design Referral (Keylan)
Attachment C	Correspondence from Platino Properties
Attachment D	Solar Access Analysis (PA Studio Architects)
Attachment E	Revised Design Report (PA Studio Architects + Matthew Pullinger Architect)
Attachment F	Revised Landscape Scheme (Paddock Studio)
Attachment G	Sign Strategy (Studio MAAT)
Attachment H	Sustainability Report (Northrop)
Attachment I	Rationale for offering developer incentives to support the delivery of affordable and social housing Letter (Chris Faulks)
Attachment J	Vertical Retirement Community Requirements Letter (Knight Frank)
Attachment K	Homecare Services in Senior Housing Communities Report (Zinnia)
Attachment L	Feasibility Report (HillPDA)
Attachment M	Letter of Support (Project Independence)
Attachment N	Revised Architectural Plans (PA Studio Architects)
Attachment P	Enhanced BASIX Certificate
Attachment Q	Enhanced NatHers Stamped Plans
Attachment R	National Affordable Housing Consortium Letter of Support

Attachment A - Response to issues raised by DSAP

Ref.	DSAP comments	Response
	General	
1	<p><i>The Panel recognises a number of significant improvements to the pre-DA design, including:</i></p> <ol style="list-style-type: none"> 1. <i>Offsetting of the towers and a reduction in the self shadowing of the courtyards</i> 2. <i>Reduction in the area of courtyard above the car parking by reconfiguration of the car parking layout</i> 3. <i>And increase in the courtyard dimension</i> 4. <i>Incorporation of generous storage areas</i> 5. <i>Reduction in the length of corridors and improved natural lighting and ventilation (though this could be further improved)</i> 6. <i>Common areas and roof terraces</i> 	<p>Noted.</p> <p>As outlined in the SEE, the proposed built form of the development is based on a series of detailed design principles, developed in collaboration with Matthew Pullinger Architect, following the meeting with Council's DSAP. These principles are aimed at maximising amenity and ensuring good design outcomes and include:</p> <ol style="list-style-type: none"> 1. Acknowledge and respond to recent residential approvals and context of the surrounding land uses 2. Retaining the existing vegetation boundary 3. Provision of a 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. Enhance activation through ground floor uses
2	<p><i>The Panel considers the following issues have not been addressed:</i></p> <p><i>The poor amenity of units looking to the high-tension power lines to the west</i></p>	<p>The high-tension power lines comprise suspended wires and a single pylon located approximately 20m west of the southern-most corner of the site.</p>

Ref.	DSAP comments	Response
		<p>The alignment of the lines changes at this pylon and generally runs to the north-west away from the site.</p> <p>The most direct proximity created between the proposal and the power lines is therefore limited to a relatively small extent of the south-western corner and relates to the pylon itself.</p> <p>This proximity is mitigated against by the generous side boundary setback of 9m adopted by the proposal, which serves to increase the minimum separation between residential units in this location and the pylon to approximately 29m.</p> <p>This same separation distance is configured as deep soil outside the proposed basement footprint and also incorporates retained existing mature trees.</p> <p>The resultant arrangement will provide dense vegetation as a visual barrier to the power lines and offers an appealing outlook from the adjacent residential units.</p> <p>The offset tower arrangement results in a lower scale of development situated in the south-western corner of the site. At a maximum of 6 stories at this point, the scale of the proposed development is broadly consistent with the scale of mature large canopy eucalypts - both those retained and those anticipated to be established within the landscape design solution.</p> <p>Those units closest to the pylon are each configured as corner apartments and benefit from an alternate aspect to the south.</p> <p>We therefore contend that these units will have a high level of amenity and will not be impacted by the transmission lines to the west.</p>
	<p><i>Deep floor plates</i></p>	<p>The proposal incorporates a series of building types that present a maximum floor plate depth of 24m. The general arrangement of these buildings is based on a double-loaded central corridor and larger than average apartments (refer Attachment E).</p> <p>The double-loaded corridor is important for the efficient operation of the seniors housing model proposed for the site.</p>

Ref.	DSAP comments	Response
		<p>The larger than average apartment sizes are a direct reflection of the market demand for seniors housing, which typically represents a down-sizing alternative to a traditional free-standing dwelling. The ability to accommodate universal access within apartments as residents face reduced mobility in their later years also contributes to these larger apartment sizes.</p> <p>In any event, the proposal is consistent with the objectives and performance criteria provided by the NSW Apartment Design Guide.</p>
	<p><i>Few dual aspect apartments</i></p>	<p>Consistent with the points made above, the general arrangement of the building works against an increased proportion of dual aspect apartments.</p> <p>Although dual aspect apartments are a generally positive unit layout that offers good cross ventilation and a choice of outlook, there is no specific target anticipated in the NSW Apartment Design Guide.</p> <p>The proposal does include a number of dual aspect apartments (typically associated with corners of buildings), which provide enhanced amenity in each instance, and overall the proposal meets the targets for cross ventilation.</p>
	<p><i>The DA has been lodged without a Sustainability Strategy being developed in consultation with Council</i></p>	<p>An updated Sustainability Report has been prepared and accompanies this letter. Refer Attachment H.</p>
<p>6</p>	<p><i>Claims made that do not appear to be borne out by the drawings or the design:</i></p> <ul style="list-style-type: none"> <i>a) living rooms in east-west facing units receiving 2 hours of sunlight to the living rooms,</i> <i>b) cross ventilation that relies on drawing air from deeply inset recesses and may provide induced ventilation to corner bedrooms only).</i> 	<p>The applicant has recalculated the number and location of apartments receiving a minimum of 2 hours of direct solar access to living areas and primary outdoor space at the winter solstice between 9am and 3pm. This has been undertaken from first principles and is illustrated in the attached view from the sun diagrams, with yellow highlighting used to identify those apartments which meet the ADG target. Refer Attachment D and Attachment E.</p> <p>We confirm the total percentage of apartments receiving the minimum extent of solar access has reduced from that originally claimed, but at a total of 78% (104 of 133 apartments) the proposal still comfortably exceeds the target established by the Apartment Design Guide (which we note does not contain any targets or provisions relating to induced ventilation).</p>

Ref.	DSAP comments	Response
		<p>The reason for the earlier inaccuracy stems from an error in methodology which included a number of apartments which received 2 hours of solar access to balconies but not to the associated primary living area.</p>
Recommendations from previous meeting		
7	<p>1. <i>Explore a range of approaches to the massing of buildings and distribution of activities to derive urban design and planning principles ...</i></p> <p>2. <i>Adopt an urban design and landscape led approach that considers a number of alternative roads and ‘public domain’ arrangements and demonstrate why one option is preferred ...</i></p> <p>3. <i>Define a preferred option that performs best in relation to the considerations outlined above and comments that follow.</i></p> <p>Comment</p> <p><i>The options consist principally of rearrangements of the same block forms. The Panel had expected a more in depth analysis of a more varied range of alternative forms given the scale of the project and the size of the site.</i></p> <p><i>The Panel notes that the yield has remained the same. The only justification for the yield is the financial viability of the overall scheme. The yield was determined by the applicant without any consultation with Council, and without reference to any planning controls, because there were none that anticipated the change of use from business park to aged housing.</i></p> <p><i>The Panel is not concerned with the permissibility of the proposal and is focused on the amenity and impact on the adjoining areas.</i></p> <p><i>Given the way the NSW planning system works, the Panel also</i></p>	<p>As noted above, the proposed built form of the development is based on a series of detailed design principles, developed in collaboration with Matthew Pullinger Architect, following the meeting with the DSAP.</p> <p>In response to Council’s pre-DA and design review processes, amendments were made to the proposal to demonstrate an optimal approach to site planning, built form and massing.</p> <p>The urban design response is based on considered design principles and reflects the proposal’s relationship to the existing Stage 1 approval and the site’s characteristics and configuration, being situated away from the primary street network and well-separated from sensitive low scale residential uses (refer Attachment E). All supporting material provided with the SEE including the solar access analysis and visual impact assessment demonstrate that the site can suitably accommodate the proposed development without any adverse impacts.</p> <p>We have previously addressed the issue of precedent in our response to Council dated 21 April 2021. In summary:</p> <ul style="list-style-type: none"> - We strongly disagree that the proposal development sets an adverse precedent for land use or built form in the locality. - The proposed development is located on a uniquely positioned site given: <ul style="list-style-type: none"> – its location on the fringe of the B7 Business Park is an appropriate transition between low density residential uses to the north and the larger-scale, mixed use development in the B7 zone – its close proximity to the Northern Beaches Hospital and future town centre as well as existing transport services

Ref.	DSAP comments	Response
	<p><i>takes into account the fact that the proposal may be interpreted as having set 'a precedent' that could be replicated and therefore the impact on adjoining sites should they develop in the same way should be taken into account.</i></p>	<ul style="list-style-type: none"> - it will contribute to the clustering of uses that will facilitate the growth and long term viability of the health and education precinct, without impacting on larger areas of B7 zoned land to the south of Warringah Road which are not physically or functionally connected to the hospital - Accordingly, the proposal must be considered on its merits and with regards to its locational attributes and minimal offsite impacts, as demonstrated through the supporting visual and solar impact analyses. - Furthermore: <ul style="list-style-type: none"> - there is no applicable height or FSR control on the site and adjoining locality and therefore there are no such controls that would be breached by the proposal nor would it set a precedent for any breach of relevant development standards through future DAs in the locality - it is permissible under the provisions of the Seniors SEPP and any other DAs for seniors housing would be subject to a full merit assessment; other forms of residential development are prohibited in the B7 zone. - The current DA in no way relies on the precedent of the approved development on Lot 2. Whilst the approved development is a relevant consideration in terms of the future surrounding land use context, it is not an essential prerequisite to the approval of the current DA. The current DA a stand-alone DA that must be considered on its merits.
	<p>Building height and prominence</p>	
8	<p><i>The building is significantly higher than the development on Lot 2 and closer to the ridge and of a similar height to the hospital and will be visible from many locations. The presentation at the Panel session explained the context for the heights but did not provide an analysis from various locations on the ground.</i></p>	<p>Material illustrating visual impacts associated with the proposal, from a range of key vantage points, is included in the SEE and was presented to the Panel and provided within the briefing.</p> <p>This material demonstrates that from key vantage points within the public realm, the proposal is not dramatically out of character with other built form elements (such as the Northern Beaches Hospital), nor is it visually prominent given its relationship set behind the stage 1 approval and to the rear of the site, and due to the combination of existing vegetation and rising topography.</p> <p>From more sensitive locations within the adjacent low density residential area, the proposal will not be visible in any material way from the street system or</p>

Ref.	DSAP comments	Response
		<p>public domain. Again, a combination of the existing Stage 1 approval, existing vegetation and the falling topography associated with the low density residential area each serve to minimise or eliminate any visual impacts (refer Attachment E).</p> <p>We refer Council and the DSAP to the detailed visual impact analysis submitted with the SEE.</p>
	<p><i>Given the determination by the Sydney North Planning Panel that the development on lot 2 was only acceptable after having the height reduced from 9 storeys to 6 after refusal by the SNPP in December 2018, no compelling arguments have been presented as to why 12 storeys should be supported on Lot 1 given the impacts and overshadowing of the central court area.</i></p>	<p>In response to Council’s pre-DA and design review processes, amendments were made to the proposal to demonstrate an optimal approach to site planning, built form and massing.</p> <p>The urban design response to accommodating the proposed commercial brief is based on considered design principles and reflects the proposal’s relationship to the existing Stage 1 approval and the site’s characteristics and configuration, being situated away from the primary street network and well-separated from sensitive low scale residential uses (refer Attachment E).</p> <p>Furthermore, the Seniors SEPP makes the use permissible. The site has no development standards relating to maximum floor space or building height, which clearly indicates Council envisages larger buildings in this locality.</p> <p>As a consequence, the development capacity and built form proposed for the site has been determined from first principles by achieving high levels of amenity within the site and by minimising or mitigating against impacts off the site. The SEE and supporting material clearly demonstrates this. In particular:</p> <ul style="list-style-type: none"> - The proposed building form adopts a prevailing 6 storey datum across the majority of the site, clearly relating to the scale of the Stage 1 approval yet responding to its more centralised location away from streets and low-scale residential development to the north. - Additional building height is proposed up to a maximum of 12 stories in the two diagonally opposed corners of the site. Importantly these two localised 12 storey elements are situated to maximise their separation and access to outlook. They represent a relatively small percentage of the total development area, and an even smaller percentage of the total site area.

Ref.	DSAP comments	Response
		<ul style="list-style-type: none"> - Offsite impacts of overshadowing and visual impacts have all been determined and are within acceptable limits. - The proposal meets or exceeds all key targets established by the NSW Apartment Design Guide. - The central courtyard space receives very good solar access at all times of the year. The proposal comfortably meets and exceeds the ADG targets for extent of communal open space and solar access to communal open space, ie: <ul style="list-style-type: none"> - the ADG sets a target for communal open space of 25% of the site area, of which 50% is configured to receive a minimum of 2 hours direct solar access between 9am and 3pm in mid-winter. - the central courtyard (when calculated as an isolated area of 2,188sqm) represents 28% of the total site area. There is an additional 155sqm of communal open space located on Level 6. - The view from the sun diagrams demonstrate that the proposal meets the 50% solar access for a minimum of 2 hours during mid-winter. Note: The Level 6 communal open space receives 100% solar access between 9am and 3pm in mid-winter. The central courtyard at ground level clearly receives greater than 50% solar access at 10am, 11am, 12 noon and 1pm. Solar access then diminishes by 2pm to 3pm. - Additionally, the proposal has a total landscaped area of 42% of the site area. Also, deep soil represents 35% of the total site area (ADG target is 15%). <p>Therefore, the proposal in its current form clearly meets and exceeds the ADG target for quantum of space and extent of solar access - more than 50% access for at least 3 hours.</p>
	<p><i>Prepare built form options study for tower locations to assess impact on desired future character, and overshadowing of dwellings, private and communal open space and adjoining sites</i></p>	<p>As noted earlier - the proposal incorporates a series of building types that present a maximum floor plate depth of 24m. The general arrangement of these buildings is based on a double-loaded central corridor and larger than average apartments.</p> <p>The double-loaded corridor is important for the efficient operation of the seniors housing model proposed for the site.</p>

Ref.	DSAP comments	Response
	<p>Comment Provided: built form is an improvement but floor plates are still deep. No exploration of a more varied built form.</p>	<p>The larger than average apartment sizes are a direct reflection of the market demand for seniors housing, which typically represents a down-sizing alternative to a traditional free-standing dwelling. In any event, the proposal is consistent with the objectives and performance criteria provided by the NSW Apartment Design Guide.</p>
4	<p><i>Undertake a visual impact analysis of the final preferred built form tower options in locations where the visibility from residential R2 zones are highest. Suggest particular emphasis on streets with a line of site such 3 Nandi Ave and the north footpath at the intersection of Romford Road / Frenchs Forest Road, and the eastern footpath of Romford Road and Bimbadeen Crescent.</i></p> <p>Comment Provided: tower forms are screened from most of the public domain</p>	<p>We note that the DSAP agrees that tower forms are screened from surrounding areas and, accordingly, that the proposal will have minimal visual impact.</p>
<p>Sensitive interfaces (Adjoining site use)</p>		
4	<p>Consider future employment generating B7 uses on the adjoining sites and design to ensure employment development will not be unduly constrained e.g. can build with DCP 'nil' side setbacks.</p> <p><i>Locate and orientate uses to ensure the activities in the adjoining business park can continue.</i></p> <p>Comment Provided: Acoustic report and mitigation measures.</p>	<p>An Acoustic Report (AR) was provided as part of the DA package. 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.</p> <p>The assessment found that the existing industrial uses surrounding the site do not generate significant noise. The AR identified that the main noise source was Frenchs Forest Road.</p> <p>Mitigation measures have been proposed for the development to reduce any acoustic impacts to future residents as a result of traffic noise. These measures include:</p> <ul style="list-style-type: none"> • Glazed windows with a 6mm thickness and aluminium framed doors • Roof, ceiling and wall construction utilising masonry system <p>These mitigation measures ensure all existing and future potential noise</p>

Ref.	DSAP comments	Response
		impacts to the seniors living units is acoustically acceptable.
	Public domain, Landscape and bushland setting	
	<p>As noted previously the site is sufficiently large to include an internal access street or shared zone.</p> <p><i>The proposal recognises the amenity provided by the bushland outlook and the tree planting in the business park.</i></p> <ol style="list-style-type: none"> 1. <i>Configure the built form to create an open to the sky internal shared street arrangement that ensures all residential lobbies have direct access to a street.</i> 2. <i>Consider providing an internal pedestrian street network that connects the end of Skyline Place with the access along the northern boundary. Consider integrating with the existing access driveway to the northern site.</i> 3. <i>Ensure all building entries are clearly defined and adjoin a street or public open space</i> 4. <i>Enhance the bushland setting provided by the Garigal National Park, the Wakehurst Parkway wildlife corridor and the Frenchs Forest landscaped road setbacks by providing endemic planting in deep soil setbacks at boundaries.</i> 5. <i>Minimum 9 m setback from boundaries to allow for a double, or offset rows of trees. (precedent: the Edgelea Precinct in Lindfield with 10m landscaped setbacks in response to the bushland setting)</i> 6. <i>Landscape buffer zones should be 100% endemic plantings.</i> <p>Comment provided: <i>The landscape plan and design of the</i></p>	<p>A revised landscape scheme has been prepared and is contained at Attachment F. In response to DSAP's specific comments:</p> <ol style="list-style-type: none"> 1. A shared-use laneway (Skyline Lane) is proposed as part of the Stage 1 development that includes a drop-off/pick-up area and short-term parking within a high-quality public realm. This shared-use plaza provides a centralised 'street address' for the precinct. The revised landscape design establishes a legible pedestrian circulation network that connects the laneway/entry plaza to the broader public realm and building lobbies. This is achieved through a generous width pedestrian orientated 'street', open to the sky. Clear sightlines are maintained between the precinct entry and 'entry plaza', to the building entries. A secondary through-link provides an additional street address along Skyline Place. 2. The revised design incorporates a pedestrian circulation network that does not rely on the covered curtilage of the ground floor buildings. Rather, the primary entry to the precinct is centralised adjacent to the driveway entry, via a generous width, pedestrian orientated, open to the sky 'street' that leads through to the central entry plaza. From here, residents and visitors can navigate to the clearly defined building entries located around a central lawn. Site through-links provide secondary access from Skyline Place and also to Frenchs Forest Road East along the northern boundary. 3. The area adjacent to building entries has been kept deliberately open and decluttered to ensure clear sightlines are maintained throughout the precinct, particularly from the precinct entry and 'entry plaza'. All building entries adjoin the central public open space. A site through-links provide secondary access from Skyline Place to the

Ref.	DSAP comments	Response
	<p><i>public domain is unresolved and inadequate. The current design is extremely monotonous and repetitious. There is very little variation in the materials, form or built form. Consequently the character and amenity of the development will rely very heavily on the quality of the landscape and public domain design</i></p> <p><i>The Panel specifically suggested the use of endemic and native species. This is hardly a onerous requirement and appropriate for the area, It is not clear why in the BASIX report there is 0.0sqm of 'indigenous or low water species'.</i></p> <p><i>The central courtyard and garden spaces are essential to the liveability and amenity of the proposal. It is not clear how the extensive areas of glass fronted commercial tenancies will activate these spaces. The overall character and feel of the ground level is very 'corporate' and unwelcoming, with extensive areas of paved over-scaled colonnades.</i></p> <p><i>The Panel notes that the commercial suites will be subject to a future DA. This is problematic as these frontages are critical to the character and useability of the courtyard.</i></p> <p>Recommendations</p> <p><i>Engage a qualified Landscape Architect to work as an integral part of the design team to improve the character and useability of the ground level. Particular attention needs to be given to the interface with the 'commercial tenancies. Blank floor-to soffit glass and recessed colonnades would be a very poor outcome.</i></p>	<p>courtyard and western building.</p> <ol style="list-style-type: none"> 4. Planting within all deep soil setbacks along the boundaries will utilise a 100% endemic species mix, selected from the Northern Beaches Council species list. 5. A building setback of 9m is proposed along the western boundary. This will include a 8m wide buffer for deep soil planting to enable large native canopy trees. However, NSW RFS's referral review has identified that the site 'must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of Planning for Bush Fire Protection 2019' This has resulted in specific landscape design requirements including: <ul style="list-style-type: none"> • a minimum 1 metre wide area, suitable for pedestrian traffic, must be provided around the immediate curtilage of the building; • trees at maturity should not touch or overhang the building; • tree canopies should be separated by 2 to 5m; • large discontinuities or gaps in vegetation should be provided to slow down or break the progress of fire towards buildings; • planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters); • species are chosen to ensure tree canopy cover is less than 15% (IPA), and less than 30% (OPA) at maturity and trees do no touch or overhang buildings; 6. Planting within all deep soil buffers along the boundaries will utilise 100% endemic species mix as selected from the Northern Beaches Council species list.
	<p>Site Coverage and deep soil</p>	
	<p><i>SEPP HSDP requires a minimum 15% of the site area to be deep soil, and 30% of the site to be 'landscaped'. As noted previously, these requirements assume a residential infill</i></p>	<p>Landscaped and deep soil areas have been increased and exceed ADG recommendations as detailed in the revised Design Report (refer Attachment E). Specifically:</p>

Ref.	DSAP comments	Response
	<p><i>context. The panel recognise that the proposal has 51% 'landscaped area' but this include a high portion of paved area and areas above the underground parking.</i></p> <p><i>7. Site coverage must not exceed 33.5% under the DCP. Due to the residential use proposed consider increasing landscaping to 40% in line with adjoining residential use and town centre precincts.</i></p> <p><i>8. Ensure minimum 15% deep soil of which 5% is located in any internal courtyards to allow for large trees.</i></p> <p>Comment: Landscaped and deep soil areas have been increased and exceed ADG guidelines</p>	<ul style="list-style-type: none"> • The revised design allows for 34% of soft landscaping. • The revised design allows for 29% of deep soil landscaping of which 12% is located within the primary central courtyard to allow for the planting of large native canopy trees. <p>We note that DSAP acknowledges that the proposal exceeds relevant ADG targets.</p>
Amenity; Building separations		
	<p><i>ADG setbacks are minimums. On this site it should be possible to configure buildings to have splayed outlooks and skewed views. This is preferable to apartments looking directly at one another as is indicated for apartment types K6A and K8 that face the buildings on Lot 2</i></p> <p>Recommendations Ensure ADG Part 2F/3F building separations fully comply.</p> <p><i>Investigate potential splayed outlook and skewed building layouts to avoid direct (perpendicular) outlook to other building frontages</i></p> <p><i>Recommend that at the boundary between apartment buildings and non-residential uses on adjoining sites the building setback be increased a further 3m</i></p> <p><i>Avoid planning with units with single outlook to blank walls</i></p>	<p>We note that DSAP comments acknowledge design improvements made in response to earlier comments.</p>

Ref.	DSAP comments	Response
	<p>Comments: Separations have been increased, splayed outlooks and skewed view have not been investigate but offset towers are an improvement, residential use have be set back further have alternative outlooks to east and west, with the exception of project independence- single aspect units looking at blank walls have been avoided.</p>	
<p>Building depth, cross ventilation and apartment layouts</p>		
	<p>Submitted plan testing indicates that the building footprints are too deep to achieve good amenity including ADG cross ventilation and solar compliance.</p> <p>9. Where setback bedroom plans are proposed they should have windows at least 1.5m wide, full height and there needs to be a line of sight to the window in accordance with ADG 4D-1 design guidance.</p> <p>10. East west facing plans will require the living room to be on the outside face of the building to achieve two hours solar and these typically require shallower plan depths. Test for compliance.</p> <p>11. Investigate multi-core typologies with more cross through apartments, shorter corridors and less units per core.</p> <p>12. Cross through apartments should have a maximum depth of maximum 18m glass to glass.</p> <p>13. Reduce the number of apartments with single aspect east and west</p> <p>14. Locate lifts so where lobbies have natural light and</p>	<p>ADG compliance with solar access targets has been achieved (refer Attachment E). There are a small number of setback bedrooms, but these are all configured to include a window that can be seen from all points of the bedroom.</p>

Ref.	DSAP comments	Response
	<p><i>ventilation and are visible from the central courtyards, street or shared zone.</i></p> <p>15. <i>Ensure all seniors ILU's are provided with access to two lifts per core where height in storeys exceeds 4 storeys.</i></p> <p>Comment</p> <p><i>Visibility of lift cores from courtyard has been improved. Corridor lengths have been shortened. Other recommendations have not been included.</i></p>	
Sustainability and Environmental Performance		
	<p><i>As noted previously, given that there are no height or density controls, and given the scale of development a very high environmental performance could be expected well beyond compliance.</i></p> <p><i>If the commercial component exceeds 2000sqm Commonwealth legislation requires NABERS reporting.</i></p> <p><i>There is no formal mechanism for Council to require a higher performance than BASIX for the residential component.</i></p> <p><i>The Panel therefore can only encourage the applicant to develop a sustainability strategy that would have long lasting benefits for the occupants and that would be likely to appeal to the Northern Beaches market.</i></p> <p><i>The panel has already recommended an increase and maximisation of natural and cross ventilation and improved solar access and penetration for the dwellings.</i></p>	<p>An updated Sustainability Report has been provided with this letter. Refer Attachment H. The Report details the proponent's commitments which includes:</p> <ul style="list-style-type: none"> • An energy score of 35 against a target of 25 as measured by BASIX (refer Attachment P) • An average 7 Star NatHers Rating (refer Attachment Q) • 5 Star Greenstar Design and Build 'Australian Excellence' • 5 Star Greenstar Communities Rating 'Australian Excellence' • Water Score of 41 against a Target of 40 • Provision of a 65,000L Rainwater tank on site • 90kW solar system on site

Ref.	DSAP comments	Response
	<p><i>The Panel notes that there are many guidelines and strategies for similar precincts that have been developed for ‘State Significant Precincts’, by Landcom and other developers for similar sites. The applicant is strongly encouraged to refer to these in developing a sustainability strategy for the site.</i></p> <p><i>Develop a sustainability strategy for the site in consultation with Council.</i></p> <p><i>For illustration references to examples of briefs for sustainability strategies and links to examples of strategies are provided at the end of this report.</i></p>	
	<p>Comment</p> <p><i>The Applicant has provided a ‘Sustainability Report’ that is a generic catalogue of sustainability measures without any commitment to implementation, modelling or definition of targets.</i></p> <p><i>There are many elements in the report (e.g. ceiling fans, car share, bicycle racks and many others) that appear nowhere else in the proposal, so the Panel questions their inclusion in the Sustainability report, and the purpose of the Sustainability report overall.</i></p> <p><i>There has been no attempt to develop a sustainability strategy.</i></p> <p><i>For example, although the ‘Sustainability Report’ refers to 5-star WELS taps in handbasins, general taps, 4 star toilets and showers and 6-star urinals, there is only a commitment to the minimum required to meet the bare minimum BASIX targets.</i></p> <ul style="list-style-type: none"> <i>• The Basix reports to satisfy the BASIX requirements</i> <i>• The recommendations in the Northrop will be applied</i> 	

Attachment B - Response to issues raised by Council's Urban Design Referral

Ref.	Council Issue	Applicant Response
<p>State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004</p>		
	<p><i>The application is lodged pursuant to State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (SEPP (HSPD) considering part of the development is for 'Seniors Housing'.</i></p> <p><i>The subject site is zoned B7 Business Park under Warringah Local Environmental Plan 2011 (WLEP 2011). Development for the purposes of seniors housing is permitted with consent pursuant to the State Environmental Planning Policy (Housing for seniors or people with a Disability) 2004 (SEPP HSPD) by virtue of 'hospitals' being permitted in the B7 Business Park zone.</i></p> <p><i>Issues are raised with the development's consistency with the Aims of the Policy, namely;</i></p> <ol style="list-style-type: none"> <i>1. Clause 2c in relation to design and compatibility,</i> <i>2. Clause 33 (a) in that the bulk, scale and height of the proposal is not found to be compatible with the existing and desired future character, nor the quality and identity of the locality, and</i> <i>3. Clause 50 (standards that can not be used to refuse development) Height, Density and Scale.</i> <p><i>As a state wide policy the SEPP HSPD provisions cannot anticipate the conditions where it might be applied. Reflected in the height and density provisions; 8m and 0.5:1 respectively as that which cannot be used as the basis for refusal, the development exploits this weakness in the policy (SEPP HSPD) to the extent the proposed development could</i></p>	<p>Council's comments indicate an expectation that the existing character of the locality will remain static, which is contrary to the locality's designation as a health and education precinct under the Greater Sydney Region Plan and North District Plan which state that:</p> <ul style="list-style-type: none"> • health and education precincts should evolve 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. • business parks should "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. <p>The built form character of the locality is rapidly evolving in line with the locality's designation as a health and education precinct and typified by multiple recent approvals for larger and taller buildings,</p> <p>Information submitted with the SEE and reiterated in this submission demonstrates that the proposal results in a high quality design outcome with no significant adverse impacts and is consistent with the emerging built form character of the locality.</p> <p>The SEE includes a detailed assessment of the proposal against the Seniors SEPP and Seniors Living Policy – Urban Design Guidelines for Infill Development which demonstrate compliance with all relevant provisions.</p> <p>Council officers' perception of any policy weakness in the SEPP should not be a material consideration in the assessment of the DA.</p>

Ref.	Council Issue	Applicant Response
	<p><i>not be seen be reasonably compatible with low density residential zones.</i></p>	
<p>Site Analysis - Built Form Context</p>		
	<p><i>The site locality is ringed by major transport corridors, is surrounded by a variety of built form uses including warehouses, multi storey commercial and business parks typified by commercial and office uses and further out, residential zones. The site itself sits within the middle of the block and as such does not benefit from broader vistas to the greater landscape conditions of the locality.</i></p> <p><i>The proposed development is of a perimeter block form with a generous central landscaped open space, with buildings articulated as two diagonally opposed tower forms (11 and 12 storey or 39 metres) complemented by lower rise (6 storey or 10 metres) blocks and a three storey communal building with facilities.</i></p>	<p>Although located away from major roads, the site does benefit from the strong existing bushland character, and from distant views across the local area including towards the coast. The revised landscape scheme places a clear focus on enhancing the bushland setting of the site (refer Attachment F).</p>
<p>Bulk and Scale</p>		
	<p><i>The scale and massing across the site is uncharacteristic of the locality; the proposed residential building is significantly higher than surrounding development, by up to 6 storeys. Given there is no FSR control applicable to the site, the combined impacts of the intensity and the proposed scale of development across the site cannot be supported on merit.</i></p>	<p>When considered against the scale of the hospital and other recent approvals, and the general scale of larger commercial and business park development, the proposal is not dramatically uncharacteristic of the area.</p> <p>The development capacity and built form proposed for the site has been determined - from first principles - by achieving high levels of amenity within the site and by minimising or mitigating against impacts off the site (refer Attachment E).</p> <p>The proposed building form adopts a prevailing 6 storey datum across the majority of the site, clearly relating to the scale of the Stage 1 approval.</p> <p>In the two diagonally opposed corners of the site additional building height is</p>

Ref.	Council Issue	Applicant Response
		<p>proposed up to a maximum of 12 stories. Importantly these two localised 12 storey elements are situated to maximise their separation and access to outlook. They represent a relatively small percentage of the total development area, and an even smaller percentage of the total site area.</p> <p>Material illustrating visual impacts associated with the proposal, from a range of key vantage points, has been provided in the submitted Architectural Plans and SEE with the DA.</p> <p>This material demonstrates that from key vantage points within the public realm, the proposal is not dramatically out of character with other built form elements (such as the Hospital), nor is it particularly prominent given its relationship set behind the Stage 1 approval and to the rear of the site, and due to the combination of existing vegetation and rising topography.</p> <p>From more sensitive locations within the adjacent low density residential area, the proposal will not be visible in any material way from the street system or public domain.</p>
	<p>Open Space and Public Domain</p>	
	<p><i>The proposal sets a central open space piazza within a perimeter block form comprising two long linear blocks with a north south axis on the east and west boundaries. Each of these blocks is comprised of a six storey element and an 11/12 storey element.</i></p> <p><i>The central landscaped piazza is designed with access pathways and varying levels of planting detail. Given the scale, intensity and length of these buildings, the streetwall effect created by the length of the block is somewhat monolithic. Breaking down the scale of the block form and mass further to create an open to the sky through site link mid block is recommended for both the east and west linear blocks.</i></p>	<p>Any 'streetwall effect' can only be an issue where the proposal addresses the street network on the Skyline Place frontage. The proposal is strongly articulated between a 6-storey base to relate to the existing Stage 1 approval and the vertically distinct 12 storey tower.</p> <p>These two forms adopt different setbacks to the primary street network along Skyline Place, reflecting the site geometry. The 6-storey element is set back 7.6m from the street and generally matches the alignment of the Stage 1 approval. The 12-storey element is setback an additional 4.9m from the site boundary. This has the inherent effect of mitigating against any 'monolithic' street wall.</p> <p>The primary building address coincides with the change in scale and setback along the Skyline Place frontage and is configured to reveal a direct line of sight into the central courtyard for legibility.</p>

Ref.	Council Issue	Applicant Response
	<p><i>Whilst it is noted there is a through building link at ground level the broader view aspects from a pedestrian scale will be dominated by the scale an height of the proposed development. A less intense proposal across the site is highly recommended to address the human scale in this distinct and unique urban context.</i></p>	<p>The strong 6 storey datum evident within the proposal is of a height generally recognised to be a comfortable urban and human scale. The 12-storey element is also a relatively familiar urban scale and regularly contributes to comfortable, well-scaled urban renewal projects.</p> <p>Similarly, the revised landscape design for the internal courtyard aims to provide a pedestrian scale for the space (refer Attachment F). Small scale interventions, such as feature shade structures, public domain furniture, and a variety of passive and active use destinations will provide a finer grain public domain.</p> <p>The use of large native canopy trees, palms and plantings will ‘green’ the courtyard and provide scale and separation between the new apartment buildings.</p>
<p>Wayfinding and Access</p>		
	<p><i>Similarly, further refinement of a clear wayfinding strategy from public street to internal street is recommended. The potential opportunity to introduce an internal street network that includes a shared zone would benefit access for the residents. The current proposal does not include this in the whole of site strategy and as such may be a missed opportunity to achieve a finer grain public domain strategy. The public domain and open space requires further detailed planning and options analysis to achieve a higher level of public domain amenity.</i></p> <p><i>Additionally, it is noted there is a 20 metre break between the development and the buildings on the adjoining lot. Whilst this assists to relieve the impact of the development somewhat it is driven predominantly by the requirement for extensive driveway access to the underground carparks of both sites. The has the effect of lessening the gesture of open space and building separation.</i></p>	<p>The proposal establishes a centrally located shared way as the primary address point and internal street network. The shared way forms a legible, publicly accessible entry from which each of the buildings and their entries are visible. The landscape revised design solution makes way finding clear and simple with universal access provided to all parts of the ground plane. Refer Attachment E.</p> <p>A shared-use laneway (Skyline Lane) is approved as part of the Stage 1 works that includes a drop-off/pick-up area and short-term parking within a high-quality public realm. This shared-use plaza provides a centralised ‘street address’ for the precinct.</p> <p>The revised landscape design establishes a legible pedestrian circulation network that connects the laneway/entry plaza to the broader public realm and building lobbies. This is achieved through a generous width pedestrian orientated ‘street’, open to the sky. Clear sightlines are maintained between the precinct entry and ‘entry plaza’, to the building entries.</p>

Ref.	Council Issue	Applicant Response
		<p>A wayfinding strategy has been developed in conjunction with the revised landscape design (Attachment G).</p> <p>The wayfinding strategy information is organised in a hierarchical manner to assist in creating a legible wayfinding experience and integrated through positioning and materials with the precinct landscape. Where possible sign forms will be applied or attached directly to the building form, or if freestanding located in garden beds to keep pathways clear. These will be augmented by interpretive and placemaking opportunities that animate the residents experience and usage of the central courtyard and broader public domain. These include pedestrian-scaled placemaking interventions, such as feature sculptural shade structures, public domain furniture or play spaces, in addition to the use of feature vegetation, such as the 'palm groves' located adjacent to active use areas.</p>
	Circulation	
	<p><i>It is noted that the two linear blocks share a central vertical circulation core. Whilst there are efficiencies to this strategy it remains that as a Seniors development a more fine grain approach to building identity and individual address is appropriate for this type and scale of development. The current plan sets the lobbies/ circulation cores deep within the plan of each of the long linear blocks.</i></p> <p><i>Articulated as a small rebate in the facade this is less identifiable than providing a clear street address and entry sequence for the blocks. The location of lift lobbies should be clearly identifiable from central courtyards, streets or shared zones. Additionally, circulation cores and lobbies should have access to natural daylighting and cross ventilation. As a minimum, the two linear blocks should be scaled down to four</i></p>	<p>The general arrangement of the various buildings allows for clear lines of sight through the primary lobby and presents lifts in a legible and intuitive manner. The single-core, double-loaded corridor is important for the efficient operation of the seniors housing model proposed for the site and is an essential attribute of the strong social and communal aspirations implicit in this operational model.</p> <p>Natural light and ventilation are available to all common circulation corridors on all floors.</p> <p>The proposal is consistent with the objectives and performance criteria provided by the ADG (refer Attachment E).</p>

Ref.	Council Issue	Applicant Response
	<p><i>smaller blocks with individual address and circulation core to each.</i></p>	
	<p>Amenity - solar and cross ventilation</p>	
	<p><i>Aspects of the proposal's planning regime requires further demonstration that principles of solar access and cross ventilation can be achieved. Double loaded corridors with single aspect apartments off a central corridor will find it difficult to achieve these principles. The south western corner accommodating the accessible housing does not demonstrate a high level of amenity with apartments in the least optimal zone of the site, particularly those facing directly west. For people with disabilities the location of these apartments present as the least desirable zone on the lot and could be viewed as discriminatory.</i></p>	<p>Further clarification and detail has been provided to substantiate the achievement of solar access and cross ventilation targets set in the ADG. The proposal is consistent with the objectives and performance criteria provided by the ADG (refer Attachment E).</p> <p>The location of the Project Independence facility has been carefully considered and is fully supported by Project Independence (the provider). The Applicant worked collaboratively with Project Independence architects to deliver the scheme to their exact requirements and has been located due to the following key advantages:</p> <ul style="list-style-type: none"> • Located next to the community facilities. Project Independence is located within the bushland setting of the ground floor of the western building. It has been sited to ensure the residents have direct access to generous, ground floor garden areas whilst also being within close proximity to communal facilities. This ensures Project Independence residents are well integrated into the active and social fabric of the precinct, creating an overall inclusive community. • Is the only accommodation on the ground level with gardens. Provision of gardens adjoining these units makes them one of the most desirable product as seniors housing most preferred aspect is product located on the ground level (with gardens) and in close proximity to the community facilities. It was also recommended in the first DSAP panel review to maximise “<i>the usable ground level for private courtyard and common space for residential</i>”, which has been made available for disability housing. • Is fully supported by Project Independence – please find attached their letter of support for the project (Attachment M). • A larger communal external terrace is located along the western and southern edge. This provides Project Independence residents with their

Ref.	Council Issue	Applicant Response
		<p>own communal area in addition to the broader communal facilities. This space includes significant deep soil garden areas with large native canopy trees that will screen the adjacent neighbouring buildings and electrical infrastructure.</p> <p>This proximity to the western boundary is mitigated against by the generous side boundary setback of 9m adopted by the proposal, which serves to increase the minimum separation between residential units in this location and the pylon to approximately 29m. The resultant arrangement will provide dense vegetation as a visual barrier to the power lines and offer an appealing outlook from the adjacent residential units.</p> <p>Those units closest to the pylon are each configured as corner apartments and benefit from an alternate aspect to the south.</p> <ul style="list-style-type: none"> • Opportunities beyond accommodation. As stated above, Platino’s model delivers a deliberate mixing of residents, in terms of health status. 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 or volunteering opportunities for the residents with an intellectual disability. Project Independence and the concierge service will identify and facilitate these opportunities within the development and could include activities such as gardening and maintenance. The intention, as stated above, is to build a “community” in the development, to provide purpose and connectedness and to support the mental and physical well-being of the residents.
	<p><i>Principally, the dominant courtyard/perimeter block typology demonstrates various opportunities to bring majority of aspects back to the central piazza for all residents. This specifically goes to the comments regarding double loaded corridors vs double aspect apartments.</i></p>	<p>As noted earlier, the proposal incorporates a series of building types that present a maximum floor plate depth of 24m. The general arrangement of these buildings is based on a double-loaded central corridor and larger than average apartments.</p> <p>The double-loaded corridor is important for the efficient operation of the seniors housing model proposed for the site.</p> <p>The larger than average apartment sizes are a direct reflection of the market demand for seniors housing, which typically represents a down-sizing alternative to a traditional free-standing dwelling. The ability to accommodate</p>

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		<p>universal access within apartments as residents face reduced mobility in their later years also contributes to these larger apartment sizes.</p> <p>The units enjoy a range of different aspects, with the majority directly overlooking the central courtyard. All elevated apartments enjoy outlook over the local bushland and towards the coast, a significant proportion of dwellings enjoy a dual aspect.</p> <p>A small minority of units have a single aspect away from the central courtyard and at a lower level without district views. In these cases, the dense perimeter vegetation and the boundary landscape design mitigates to provide an amenable aspect and outlook.</p> <p>In any event, the proposal is consistent with the objectives and performance criteria provided by the NSW Apartment Design Guide.</p>