

10 June 2021

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

Dear Lashta

**Re: 5 Skyline Place, Frenchs Forest (DA2021/0212)**

This document has been prepared to accompany the response to Council's Urban Design referral and comments from Council's Design and Sustainability Advisory Panel (DSAP) received in relation to DA2021/0212 with specific **reference to the DSAP panels request for the justification of the scale and developer intent within the scheme.**

The comments received from Council and the DSAP refer to matters relating to design and planning merit. While these are important aspects of the assessment, they do not address the substantial **social and economic impacts** that result from the proposed development which are also required to be considered under 4.6 of the EPA.

The subject development is unique in that it has a significant social component which will result in substantial public and social benefit that extends beyond simply being compliant with the relevant controls.

**DEVELOPMENT INTENT**

The development at Skyline Place has been designed to be absolute best practice in seniors and social housing. The design incorporates the results of extensive research comprising focus groups, questionnaires, consultation with service providers and stakeholders. Issues addressed in this research include:

- requirements for common area facilities to build community
- how to attract residents and visitors who vary in age
- home care delivery costs
- dwelling design details, sizes and mix and
- the requirements of affordable housing providers.

The result is a development that incorporates innovative features that are above and beyond regulatory requirements and which will be a great place for seniors to live in and be cared for in their own homes, should their needs change or increase.

Platino's proposal provides a solution to meeting the demonstrated gap in the seniors housing market effective immediately. The lack of availability of appropriate housing is an issue for older people in Sydney right now, and it is not an issue for which we can afford to create unnecessary delays. Any potential housing for seniors to be provided within the Frenchs Forest Town Centre, under Council's Structure Plan, is hypothetical at present and may not be delivered for at least 10 years.

## **SOCIAL BENEFITS ASSOCIATED WITH THE PROPOSAL**

Social and public benefits that will result from the proposed development include:

### **1. Affordable and Social Housing**

The proposal incorporates 22 units for affordable and disability housing (17% of the total number of dwellings) which would be delivered as two components:

1. **Project Independence** - provides assistance and housing for people with an intellectual disability. This component comprises 10 dwellings and associated common rooms, plus a separate dwelling for the facility manager, all designed to meet the specific detailed requirements of Project Independence – refer to **Attachment M** for the letter from Project Independence.
2. **Housing for women aged over 55**. The development proposal comprises 12 Independent Living units that are to be provided as affordable housing in perpetuity by community housing, as provided in
  - **Attachment I** – letter from Chris Faulks, Deputy Chancellor, University of Canberra and
  - **Attachment R** – letter prepared by the National Affordable Housing Consortium.

The residents of the affordable component will have the use of all of the facilities and common areas and will be part of the integrated community.

There is no requirement within either Council's LEP or the SEPP (Seniors) to provide for any affordable or social housing within the development. The 17% included is therefore over and above any statutory requirement and is being proposed to address an identified need within the Northern Beaches LGA.

### **2. Addresses demonstrated demand**

Older people wish to lead active, independent lives in their own homes, with the ability to tap into care facilities as needed. Market research and consultation undertaken by Platino has shaped the design, the size, the mix and the interior arrangement of the independent living units (ILUs).

The market response to the seniors living development approved on Lot 2 demonstrates the strong demand for the type and design of these dwellings. All ILU's have been sold and a further 550 people over the age of 55 have requested to be put on the database for any future stages. 90% of these people live within 4kms of the site. The reasons given for wanting to move include:

- Don't want to leave the area
- Need more appropriate accommodation
- Loneliness or death / loss of partner
- Impact of COVID

SEPP (Seniors) was designed to address this demand for a specific product type, which is being accelerated by the ageing of the baby-boomer generation. The demand for the ILUs approved on Lot 2 is evidence that the project is delivering seniors housing in the manner intended by the SEPP. The current proposal can

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provide additional dwellings in a location where demand has been clearly demonstrated, without adverse effect (by way of overlooking, shadowing or creating traffic) in accordance with the objectives 1.3 (c) of the EPA Act **“to promote the orderly and economic use and development of land”**.

### **3. The development will allow economical provision of services and facilities**

The development has sufficient scale to facilitate the provision of concierge and home care services, bus and car-share services and other facilities which otherwise cannot be provided economically. Ongoing affordability of these services is of great importance for future residents, as is documented in the independent reports prepared by Knight Frank (**Attachment J**) and Zinnia (**Attachment K**).

Extensive common facilities and services including, swimming pool, gym, men’s shed, art rooms, common community gardens, off leash dog area, games room, theatre, rooftop meeting areas and computer rooms will **encourage an active lifestyle and improve quality of life and life expectancy**.

### **4. Findings of the Royal Commission into Aged Care**

Findings of the Royal Commission into Aged Care, completed in March 2021, include;

- People desire to stay in their homes.
- Independent living units are appropriate homes for seniors and allow the provision of home-care to be provided in a much more efficient and effective way than into suburban homes (Appendix I).
- Increase in independent living units will reduce demand for aged care beds.
- The impact of COVID in relation to isolation has had a terrible effect on the physical, mental, and emotional wellbeing of residents in aged care across Australia.

The development responds to this public need.

As stated in the Social Impact Report that was submitted with the DA: *“Through a combination of accessible design and technology (in partnership with Apple and Microsoft) the project will keep local Northern Beaches seniors in their apartments rather than enter residential aged care. This will not only reduce the burden on the Government and the Health system, but will significantly improve the well-being of residents by keeping them in an environment in which they are comfortable and where they are surrounded by family and friends.”*

### **5. Offers intergenerational opportunities**

The development will allow for the creation of a community that will incorporate a mix of common and publicly accessible facilities such as a café, an over 55s gym, pharmacy, children’s playground and allied health and medical professionals. These uses will provide services within the development, and also to the wider community.

Residents will have more opportunities to interact with the wider community, including people of all ages, than are available to those residing in more isolated over 55’s communities.

### **COMPLIANCE AND EXCEEDANCE WITH NUMERICAL STANDARDS AND CONTROLS**

The proposal **greatly exceeds the minimum requirements** outlined in SEPP (Seniors), the ADG and Council’s DCP as shown in the table below. There are zero non-compliances – the proposed development complies with all relevant development standards and regulations and greatly exceeds in areas of immense value to seniors, for example Landscape space and sustainability.

COMPLIANCE TABLE SUMMARY	Proposal	Requirement
<b>Amenity Issues</b>	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%
<u>Apartment Sizes</u>		
3 bed	average area – 131 m <sup>2</sup>	min – 90 m <sup>2</sup>
2 bed and 2 bed + study	average area – 108 m <sup>2</sup>	min – 70 m <sup>2</sup>
1 bed	average area – 63 m <sup>2</sup>	min – 50 m <sup>2</sup>
<u>Balcony Sizes</u>		
3 bed	average area – 20 m <sup>2</sup>	min – 12 m <sup>2</sup> m
2 bed + study	average area – 15 m <sup>2</sup>	min – 10 m <sup>2</sup>
1 bed	average area – 9 m <sup>2</sup>	min – 8 m <sup>2</sup>
Common Internal Spaces for Residents	1,229 m <sup>2</sup>	nil
Roof Top Outdoor Garden (North Facing)	155 m <sup>2</sup>	nil
Building Separation (Central Court)	39m & 34m	18m

<b>Landscaping &amp; Communal Spaces</b>		
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

<b>Affordable Housing</b>	22 /17% of total units	0% required
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<b>Sustainability</b>		
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

There is not one non-compliance with any development standard or regulation. The proposal does not result in adverse environmental impact by way of traffic any overshadowing or overlooking of any residential areas and results in public benefit without adverse effect on neighboring properties and is consistent with Clause 2(c) of the Seniors Housing SEPP that it be of good design.

## CONCLUSION

The development as proposed offers an opportunity to cater for the clearly demonstrated need for additional housing for seniors and people with a disability. In addition, the development provides affordable housing that will be provided in perpetuity.

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The type, design and mix of dwellings and associated facilities, open spaces and services proposed results from Platino's extensive research and consultation with older people, and our understanding of the needs and opportunities that can be offered. The acceptance of Jardin demonstrates that the innovative model is one that aligns with the expectations of the market.

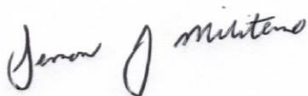
The development proposed in the current DA provides not only for high quality and well-designed housing for seniors and people with a disability, but also for significant social and public benefits within a built form that is totally compliant with the relevant planning provisions and would not result in any adverse impacts on the surrounding areas.

Council and its DSAP commented that although the "tower forms are screened from the public domain, the justification for the size of the development was the financial viability of the overall scheme". The conclusion of the independent report prepared by HillPDA (**Attachment L**) is quoted below:

- *"The development cannot deliver the 22 affordable housing and housing for people with a disability unless the development is approved in its current form*
- *The return of profit and risk on a per unit basis remains substantially the same as that in the current approval on Lot 2.*
- *This study demonstrates that 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 a financially viable development (in accordance with industry standards)"*

We would be very happy to discuss these matters with you further. Please contact me on 0413 819 447 should you wish to arrange a meeting.

Yours sincerely



Simon Militano

Development Director – Over 55' Housing

**Platino Properties**