

23 May 2022
Brian Kirk
Panel Chair Application REV2021/0045
C/o Planning Panels Secretarial

Dear Brian,

Re: 5 Skyline Place, Frenchs Forest DA2021/0212 & REV2021/0045:

In relation to the above application and review that has been submitted for determination, we have carefully considered the Sydney North Planning Panel's (SNPP) previous determination, Councils' comments and questions raised by Panel members at the Panel briefing dated 30th March, 2022. This letter addresses these items and is intended as a supplement to the presentation to be provided to the Panel on 26th May, 2022.

The application has been amended to fully address the SNPP's reasons for refusal, in particular by substantially reducing the height and floorspace such that the proposal is now of similar height to several recently approved buildings in the B7 zone.

The proposal not only complies with, but significantly exceeds all minimum requirements of the ADG, and is designed to 5-star sustainability standards, a summary of which is found in (Tab 1).

It also includes substantial social benefits by way of 15 affordable housing units to be provided in perpetuity, including a component specifically for use by people with a disability, and extensive community facilities for the use of all residents. A summary of the social benefits is found on page 9-10.

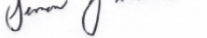
Council has maintained its opposition to the development on the basis that it does not accord with its local policies. However, the new Housing SEPP (enacted in November 2021) specifically identifies the B7 zone as being suitable for seniors housing and provides additional reasons as to why the proposal merits approval. We note that Northern Beach Council (NBC), wrote to the DPIE opposing the permissibility of seniors housing in the B7 zone during the consultation period for the then draft Housing SEPP. Given Council's submissions, it is unsurprising that it continues to oppose this proposal despite the fact that the SEPP is now in force. The NBC submission to DPIE is found in (Tab 2).

At the Panel briefing on 30th March 2022, Marcia Doheny and Stuart McDonald asked about the potential effect of the proposal on adjoining land uses. To address this question a comprehensive audit of current uses in the vicinity of the site and operating hours has been undertaken (Tab 3). This audit has demonstrated that uses nearby are mainly medical and commercial and operate during office hours, other than a sleep clinic and gym which operates 24/7. Potential future uses are likely to be similar as those existing given that industrial uses are neither permitted nor suitable given proximity to the well-established residential area to the north. This land use analysis is supplemented by an additional acoustic report (Tab 4) and a commercial assessment of most likely future uses (Tab 5).

All seniors independent living units in the first stage of the development at Skyline Place have been sold, with 82 residents (average age of 72) moving into the new community in November 2022. A project database of 900 people plus 46 community groups, of which 90% reside within 4kms from the site, has been developed for future dwellings, demonstrating the strength of the demand for seniors housing from people within the LGA. We are advised that 129 individual submissions or petition signatories have been provided in support of this application, further demonstrating demand and positive sentiment of many senior Northern Beaches residents.

The complete development (Stage 1 and Stage 2) and its operations plan has been designed to first-class standards and a highly sustainable seniors' community in Australia. It satisfies the intent of the new housing SEPP, all of the strategic prevailing planning documents of future context, the new Seniors Housing Design guidelines and greatly exceeds every minimum standard.

Kind Regards,

Simon Militano 
Project Director – Jardin Frenchs Forest
Summary of proposal and issues

George Revay 
Managing Director – Platino Properties

1. RESPONDING TO THE NSPP DETERMINATION – DESIGN AMENDMENTS

The Panel's Reasons for Refusal stated with respect to scale, bulk and height, the proposal:

- Is not compatible with the existing and future character of the area and does not contribute to the quality and identity of the area; and
- Failed the principles of SEPP65 insofar as they apply to context and neighbourhood character, built form and scale, density, landscaping and amenity.

The Panel stated that the proposed use was permissible, and that seniors housing could occur on the site subject to acceptable impacts.

It is noted that:

- The Panel's concerns did not relate to impact of the proposal on adjacent properties by way of overlooking or overshadowing or the compatibility of the proposal to adjacent uses.
- The Panel, (as we understand), did not otherwise object to the design with respect to the amenity issues associated within the buildings, e.g., cross ventilation, solar access etc.
- The Panel, (as we understand), had no concerns as to the effect of the development on the use of surrounding lands.

To address the issue of context and character, the height and bulk of the proposal has significantly been reduced.



A. Height Bulk & Scale

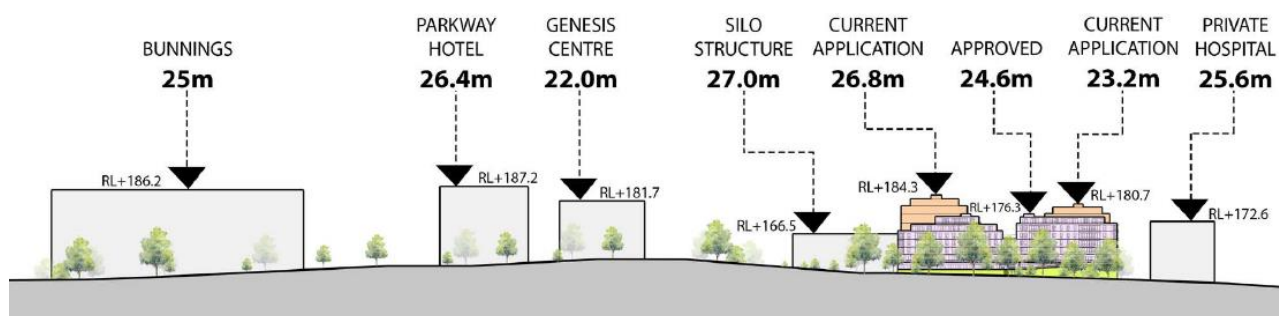
The buildings have been reduced in height as follows:

- The East building from 12 storeys (39.3m) to 7 and 8 storeys (recessed upper levels); and
- The West building from 11 storeys (36.3m) to 7 storeys (recessed upper level)

Noting that the top floors on both buildings are set back and that the buildings follow the slope of the land up from Frenchs Forest Road.

Key heights and RL's are:

East Building	7 - 8 storeys	26.8m high	RL 184.3
West Building	7 storeys	23.2m high	PL 180.7



The maximum height of the buildings is now similar to recent approvals in the B7 area, including the Parkway Hotel (26.4m), Bunnings (25m) and the Tilley Lane Hospital (25.6m).

Bunnings Warehouse – 25m (DA2020/0717)

Council's assessment report states: *"the height has been considered in context with the surrounding development in the business park setting and is considered to be consistent in that respect"*

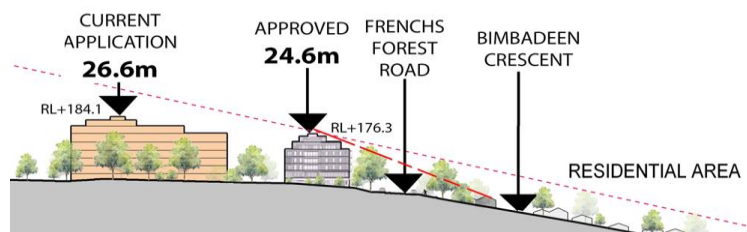
Parkway Hotel 26.4m (DA 2015/0901)

Council's assessment report states: *"the scale, bulk, and height of the building proposed to be a hotel is deemed acceptable and assessed as being compatible and consistent with development envisaged for the site and adjoining and surrounding sites located within the B7 Business Park Zone."*

Tilley Lane Frenchs Forest 25.6m (DA2017/0711)

Council's assessment report states: *"the proposed building height is deemed to be acceptable, given the B7 Business Park zone in this location has no height restriction. The building height and scale of the building will not create an unreasonable impact on adjacent development, or the existing streetscape amenity"*

As can be seen in the elevation from French Forest Road the buildings will not be seen to protrude above the existing approval.



The proposed development (as amended) will not be visible from the residential areas to the north, as demonstrated by the view impact diagrams below.



ORIGINAL APPLICATION



CURRENT APPLICATION

The amended proposal is similar in height to other buildings that Council has assessed as appropriate and also satisfies the Panel's concerns with respect to context and impact on residential areas outside the B7 zone.

B. Floor Space

The proposal has been amended by reducing the FSR from 2.42:1 to 1.93:1. This is substantially the same as the FSR of 1.91 to the approved building immediately to the north of the proposed development, which does not contain any affordable/disability housing.

C. Landscaped area

The landscape plan has been amended such that the native tree canopy along Skyline Place will achieve a height of 27m, the same height as the amended height of the adjacent building. The revised landscape design has received full endorsement from the councils' landscape officer.

The overall landscaped area on the site has increased due to amendments of the landscape design, including a reduction in the width of some paved areas and as such the landscape area has increased from 33.8% to 36.2%. An architectural image from the landscape plan is shown below:



D. Site Coverage

Site Coverage as defined under the Warringah DCP has been reduced from 40% to 32.3% complying with the 33.3% DCP numeric control

E. Front boundary setback

The DCP requires a minimum setback of 10m from a front boundary. The objectives of the front boundary setback controls are:

- *To create a sense of openness*
- *To maintain the visual continuity and pattern of buildings and landscape elements.*
- *To protect and enhance the visual quality of streetscapes and public spaces.*
- *To achieve reasonable view sharing.*

Strict compliance with the DCP (as opposed to HSPD) front setback control would therefore result in an inconsistent presentation of buildings to Skyline Place. The existing approval on Lot 2 is set back 6.5m from the Skyline Place boundary, as shown below.

The proposed development is set back between 7.6m and 12.5 m from the Skyline Place boundary with an 8.6m setback adjacent to the turning circle. This results in an average setback of 9.5 metres to Skyline Place. The numeric DCP control calls for a 10m setback to a primary street. The 9.5m average setback allows landscaping and planting of large canopy trees (as per our landscape drawings to screen the height of the building at the reduced height, bulk and scale).



While the proposal represents a minor numerical non-compliance, it achieves the objectives of the control; in particular it will maintain the visual continuity and pattern of buildings and landscape elements and allows retaining a number of and planting of new canopy trees that reach similar height to the buildings on maturity. A complying Front Area Setback is found in (Tab 6)

F. Other Architectural Changes & Peer Review by PTW Architects

Some further design commentary responding to the councils' DSAP comments:

- The Communal rooftop garden area is retained and relocated to the highest level for all resident access
- Trees when fully grown will be same height as buildings
- Facades has been redesigned, with additional brick detailing and articulation create a more fine-grained effect appropriate for the lower scaled buildings and to harmonise with Stage 1
- The Community building and pool area roof have been redesigned with a green roof & solar panels to heat pool. Dwellings facing central area now look onto a green roof.

In addition to the changes made from the DSAP pre-lodgement (in Oct-21) and release of the new Housing SEPP a subsequent independent design peer review was completed by Diane Jones, of PTW Architects. Diane is an expert in seniors housing, a Member of the State Design Review Panel (SDRP) and Adjunct Professor, UNSW Built Environment. The peer review concluded:

"Reflects the relevant objectives of the Seniors Housing Guidelines. Although designed before the introduction of the Seniors Housing Guidelines, the proposal reflects the relevant objectives of the Guidelines, particularly in the categories of":

01 Care for the planet

04 Care, wellbeing and community

05 Design for physical ageing and dementia

06 Good design"

The peer review extract is found here in (Tab 7)

2. THE EMPLOYMENT OBJECTIVES OF THE ZONE

We understand Councils' position in relation to importance of protecting employment zones.

We have undertaken an impact on the employment objectives of the zone, via an Economic Impact Assessment (EIA) of our proposal. The assessment from HillPDA notes:

- *"French Forest Business Park encompasses 56.5 hectares with the site occupying 1.2% of this total area"*
- *"The Business Park could accommodate 3-7 times the base and high strategic employment targets and, as such, the Proposal would have **no effect on the employment objectives of the zone**"*
- *"The Proposal increases the employment on-site from 44 to 86 jobs, an addition of 42 jobs or 95%"*

This is a shovel ready site, construction is to commence immediately on approval, and as such the EIA notes;

- *During the construction phase the economic benefits are estimated to be **198 direct and indirect jobs years created with around 144 of these jobs going to residents in the Northern Beaches LGA**"*

The extract from the full Hill PDA report is found in (Tab 8)

It is also noted from the previous panel determination (REV2019/0014) regarding consistency of objectives

"Such inconsistency is to be expected given that the Warringah LEP prohibits residential development in the B7 zone yet the overriding SEPP (HSPD) permits it and, in the interests of its overall aim of encouraging seniors housing, specifies that its aims will be achieved by 'setting aside local planning controls that would prevent the development of"

3. THE NEW HOUSING SEPP RELEASED INTO LEGISLATION – NOV-21

The new Housing SEPP, legislated in Nov-21, further specifically identifies the B7 zone as being suitable for seniors housing and with the fundamental key change giving additional reasons why the proposal warrants approval as follows:

- A. **Nov-21; Seniors Housing is now entirely permissible in B7 zones** (Part 5, Division 1, Clause 79), there is no longer a requirement that hospitals are required to be permissible (SEPP HSPD 2004)

In addition to this change, it is worth noting;

- B. **Aug-21 Northern Beaches Council (NBC) Submission to the DPIE on the proposed (at that time) Draft Housing SEPP**

NBC in their submission specifically requested that B7 zones were to be exempt from permissibility for seniors and disability housing and noted it exacerbated the issue of permitting seniors housing. The extract from their submission is found below:

“Council also opposes the mandating of seniors housing as a permissible use in the B3, B5, B6 and B7 zones. This approach is contrary to advice provided by the Greater Sydney Commission and is inconsistent with Council’s Local Strategic Planning Statement -Towards 2040 and Local Housing Strategy”

*“The draft Housing SEPP fails to address these concerns and **appears to exacerbate the issue** by permitting seniors housing in all business zones including those where residential type uses are not currently mandated under the Standard Instrument (B3, B5, B6, and B7 zones). This approach is contrary to previous guidance provided by the Greater Sydney Commission on the protection of employment lands”*

- C. **Housing SEPP was prepared with knowledge of the wider strategic planning documents**, including those that relate to preservation of employment lands land – noting that s3.30(2) requires Minister to consult Greater Sydney Commission if proposed instrument relates in land within Greater Sydney Region and the Minister is of the opinion that the instrument is likely to significantly affect the implementation of a strategic plan affecting the region.

Relevant extract from the Housing SEPP can be found **(Tab 9)**

Extracts from the Northern Beach Council Submission to Housing SEPP can be found in **(Tab 2)**

4. SUPPLY OF SENIORS HOUSING IN THE NORTHERN BEACHES CONTINUES TO SIGNIFICANTLY LAG BEHIND DEMAND:

Dr Nigel Stapledon (Chief Economist at Macroplan, Research fellow at UNSW Business school) undertook a supply/demand analysis which took into account the Seniors Housing to be provided in the Frenchs Forest Town Centre Precinct Plan. The report concluded;

“There is a critical need for additional (modern) ILU’s (Independent Living Units) in the Northern Beaches area in order to cater to its ageing population”.

“The NBC entire population is forecast to increase by 35,000 from 2016-2041. More importantly the over 55’s is to increase by 38,000 in this period which will account for over 105% of the total population growth.

“The supply of ILU housing has been and continues to significantly lag behind demand. That shortfall is expected to grow by 275 ILUs over the next 5 years (2021-26) creating a cumulative shortfall of 623 units by 2026 which then continues to grow and the cumulative shortfall will likely rise towards the 2,000 mark by 2041. The calculated shortfall noted above takes into account supply to be provided from the Frenchs Forest Town Centre and any known approved pipeline (assuming this all proceeds)”

The Frenchs Forest Draft Place Strategy provides minimal seniors housing (one aged care facility only on Warringah Parkway) – and there are no other specific areas noted in the NBC Local Housing Strategy. As Noted in the Macroplan report:

“In the Northern Beaches Hospital Precinct Plan (NBHP), which is a major source of dwellings for the Northern Beaches, it is assumed that over 92% of the population will be aged under 55. In keeping with that expectation, it makes reference to there being room for one “aged care facility” which would be more likely a nursing home. There is no expectation of scope for ILU developments in the Precinct which

reflects the likelihood that build-sell apartment developments will out-compete ILU developments in the Hospital Precinct”

Extracts from the Macroplan Report is found in (Tab 10)

The NBC Local Housing Strategy (LHS) noting delivery of a total of 128 Seniors units (2016 -2021), and the requirements of 2,500 units by 2036 (page 50) is found in (Tab 11)

Extracts from The Frenchs Forest Draft Place Strategy is found (Tab 12)

5. SUBJECT SITE IN RELATION TO CONTEXT OF ITS SURROUNDING DEVELOPMENT:

A. Business Land Use Audit:

The SEE addressed permissible/prohibited uses in the B7 zone, i.e., that the zone prohibits industries, waste or resource management facilities, vehicle body repair workshops, vehicle repair stations and depots. In relation to permissible uses, only Light Industry is permitted which is defined under the Warringah LEP as *“Light industry means a building or place used to carry out an industrial activity that does not interfere with the amenity of the neighbourhood by reason of noise, vibration, smell, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil, or otherwise”*

Subsequent to the SEE, the business/land use audit demonstrates that the only 24/7 operations within the business park is an overnight sleep clinic and fitness gym.

However, **noting future permissible uses**, based on worst case hypothetical future uses, a supplementary acoustic report notes the proposed development would not impact on the ability of those businesses to operate. The specific uses mentioned by council of concern, that are permissible, childcare centres, hardware and building supplies, light industry self- storage units and warehouses and distribution centres the acoustic report compiled by Acoustic Logic (AL) looked in detail at the;

- 24-hour distribution centres during the evening and night time periods, based upon conservative assumptions, as well as approved operational conditions of a similar use within the same business park, along eastern, southern and western of the project site. A Statement of Environmental Effects for a warehouse facility located at Lot 1 DP 220769, 8 Rodborough Road, Frenchs Forest Frenchs Forest (Amazon Distribution centre – 24/7 operations).
- Hypothetical worst-case scenarios on the other uses noted

The acoustic report notes:

“Noise generation from worst-case scenarios, inclusive of operation approved by council for similar scenarios, within the surrounding locality of the proposed senior’s development have been shown to be able to comply with relevant local, state and Australian statutory noise requirements provided appropriate service road design and locations. Hence, it has been shown within this report that the approval of 5 Skyline Place (Ref: REV2021/0045) does not significantly impact the ability of businesses to perform these operations noting previous council previous approval conditions on similar sites within the same B7 zone”

Extracts from the supplementary Acoustic Report, can be found in (Tab 4)

B. Market Comparison Exercise:

A market comparison exercise has been undertaken by Knight Frank to assess the most likely businesses / uses that would be sought by adjacent sites to the subject, which is summarised in the below table:

Summary of Leasing Evidence

Market Segment	Range (\$/sqm net face)
Frenchs Forest business park: Office Accommodation	\$225 - \$375
Frenchs Forest business park: Warehouse and Warehouse/Office Accommodation	\$145 - \$225
Sydney Industrial Markets: Major Distribution Facilities	\$125 - \$180

The report notes:

“Given the permissible uses in the applicable town planning controls the rates commanded for office accommodation are significantly higher than those for warehouse accommodation in the local market, which in turn are noted to be higher than those rates indicated by the larger warehouse/distribution facilities. We would consider it more likely for higher value land uses such as commercial style premises to proceed within the local Frenchs Forest business park on a site such as the subject.

The relevant extracts from the Knight Frank report in **(Tab 5)**

6. FUTURE SITE CONTEXT:

A. Housing SEPP (Enacted November, 2021):

The Housing SEPP specifically permits seniors housing in B7 zones.

B. Greater Sydney Region Plan, A Metropolis of Three Cities (2018):

The Greater Sydney Region Plan, A Metropolis of Three Cities (2018) specifically identifies Frenchs Forest, as **“an emerging health and education precinct”**. The plan *“outlines a vision for health and education precincts as innovation districts that are Transit-accessible precincts centred around health and education assets, surrounded by a network of medical research institutions, a mix of complementary industry tenants, housing, ancillary facilities and services”*.

It is our view that a seniors facility designed to Australian excellence standards, with a focus on health and well-being, mix of uses that embraces diversity of housing typologies (seniors, affordable and disability) completely aligns with this future context.

C. Northern District Plan (2056) (which includes the Northern Beaches Local Government area):

The **Northern District Plan** notes that the B7 zones will evolve into mixed use zones supporting a wider range of higher order employment generating uses:

“The plan indicates that 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”

The relevant extracts from the Greater Sydney Region Plan and Northern District Plan is found in **(Tab 13)**

7. SOCIAL, PUBLIC AND COMMUNITY BENEFITS OF THE PROPOSAL

The development contains a number of community benefits summarised as follows:

A. Affordable and Disability Housing (15 Dwellings); 11 dwellings and associated common rooms, including a separate dwelling for the facility manager, all designed to meet the specific requirements of Project Independence, a specialist social housing provider for persons with an intellectual disability and 4 ILU units for woman over 55 approaching homelessness. All dwellings to be provided as **affordable housing and housing for people with intellectual disabilities into perpetuity**

This housing is only possible at 1/3rd of the market value. An independent assessment of this public value is calculated at \$7,200,000 as assessed by HillPDA using the approach applied by the Department of Housing and Australian Tax office in assessing social benefits. The assessment notes

“a CHP will acquire 15 apartments (& common areas allocated) with a fair Market Value of \$11,200,000 for \$4,000,000. The value of this Public Benefit is \$7,200,000. “This contribution represents a discount of 63% to 65%”

The relevant extracts from the HillPDA assessment is found in **(Tab 14)**

- B. There are substantial areas of community space, outdoor areas (rooftop and 2,000sqm piazza) and facilities for the use of all residents of the development.
- C. The development provides a unique concierge model that focuses on home care services, pooling of homecare services and creation of a community. The development addresses the accelerating demand for age suitable housing that allows residents to age in place whilst reducing demand on aged care.
- D. The achievement of a number of sustainability initiatives:
 - Green Star Design & As-built (v1.3) - 5 Star (Australian Excellence) rating
 - Green Star Communities (v1.1) - 5 Star (Australian Excellence) rating
 - A Basix energy score of 35 (a 40% improvement on minimum target requirement of 25)
 - A NatHERS rating of 7+ star (on average) against a requirement of 5 Stars

The Sustainability commitments letters is provided in **(Tab 15)**

8. COMPLIANCE WITH AND EXCEEDING NUMERICAL STANDARDS AND CONTROLS

The proposal **greatly exceeds the minimum requirements** outlined in SEPP (Seniors), the ADG. The 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
Amenity Issues		ADG, DCP, SEPP seniors	ADG, 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 – 135 m ²	min – 90 m ²
	2 bed & 2 bed + study	average area – 106 m ²	min – 70 m ²
	1 bed	average area – 62 m ²	min – 50 m ²
Balcony Sizes	3 bed	average area – 39 m ²	min – 12 m ² m
	2 bed & 2 bed + study	average area – 24 m ²	min – 10 m ²
	1 bed	average area – 10 m ²	min – 8 m ²
Common Internal Spaces for Residents		1,170 m ²	nil
Roof Top Outdoor Garden (North Facing)		160 m ²	nil
Building Separation (Central Court)		39m & 34m	18m
Landscaping & Communal Spaces			
Communal open space including outdoors common roof deck		28% of site area	25% of site area
Landscape	ADG	36%	33% minimum
Deep Soil	ADG	32%	15% minimum
Landscape	DCP	36%	33% minimum
Landscape	SEPP Seniors	65%	30% minimum
Affordable Housing		15 /14% of total units	0% required
Sustainability			
Basix – Energy		Score of 35	Score of 25
Basix – Water		Score of 51	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

TAB 1 - ADG COMPLIANCE TABLE

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Landscape ADG		36%	33% minimum
Deep Soil ADG		32%	15% minimum
Landscape DCP		36%	33% minimum
Landscape SEPP Seniors		65%	30% minimum
Affordable Housing		15 /14% of total units	0% required
Sustainability			
Basix – Energy		Score of 35	Score of 25
Basix – Water		Score of 51	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



27 August 2021

Mr Luke Walton
Executive Director - Local Government and Economic Policy
NSW Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

luke.walton@planning.nsw.gov.au

Our Ref: 2021/592534

Dear Mr Walton,

Thank you for the opportunity to comment on Draft State Environmental Planning Policy (Housing) 2021 (Housing SEPP). The detailed comments on the proposed SEPP provisions are attached to this letter.

Northern Beaches Council generally supports the bringing together of housing-related controls into a single SEPP. Many of the new controls and standards offer significant improvements on current controls, particularly as they relate to Boarding House development.

However, Council remains opposed to State-based controls which override local planning controls to provide significantly larger buildings, and less landscaping, than would otherwise be permitted, negatively impacting local character and place. Floorspace ratio and height bonuses for boarding houses and seniors housing remain an issue in this regard.

Council also opposes the mandating of seniors housing as a permissible use in the B3, B5, B6 and B7 zones. This approach is contrary to advice provided by the Greater Sydney Commission and is inconsistent with Council's Local Strategic Planning Statement - Towards 2040 and Local Housing Strategy, with potentially significant and lasting impacts on the retention of important employment lands on the Northern Beaches into the future.

Council's Local Housing Strategy, which is currently with the Department of Planning, Industry and Environment for approval, proposes exemptions from housing-related SEPPs in circumstances where Council can demonstrate that the demand for these forms of housing will be met via alternative strategies.

Our submission provides comment on these strategies and we look forward to discussing them with the Department in more detail.

- Land identified in another planning instrument as “flood planning” is included as well as “land shown cross-hatched on the bush fire evacuation risk map” in the SEPP. However, there is no clear process for inclusion on this map.
- Council considers that “bushfire prone land” that is identified in another planning instrument should also be included in the “Environmentally Sensitive Land” definition.
- Council is currently undertaking bushfire studies in parts of the Council area which could impact the future zoning of that land and/or could be included.

Business Zones

- Council notes the justification for seniors housing to be permitted in business zones being that this reflects what is currently allowed under the Seniors SEPP.
- Council has previously raised issues with the Department regarding the permissibility of seniors housing developments in the B7 Business Park zone under Warringah LEP 2011, and its impact on employment lands on the Northern Beaches.
- The draft Housing SEPP fails to address these concerns and appears to exacerbate the issue by permitting seniors housing in all business zones including those where residential type uses are not currently mandated under the Standard Instrument (B3, B5, B6, and B7 zones). This approach is contrary to previous guidance provided by the Greater Sydney Commission on the protection of employment lands and is inconsistent with Council’s Local Strategic Planning Statement -Towards 2040.
- The proposed approach will have significant implications for Council’s B7 Business Park (Frenchs Forest), B3 Commercial Core (Warringah Mall), and B6 Business Enterprise Corridor (future Pittwater Rd strip in Brookvale).
- Council offers two alternative approaches to resolve this issue:
 1. Permitting seniors housing only in those business zones where Residential Flat Buildings or Shop Top Housing are permitted, like the approach taken in this SEPP for co-housing and boarding houses.
 2. Limiting seniors housing in business zones to residential care facilities only, like the approach taken in this SEPP for seniors housing in R2 Low Density zones. Residential care facilities can generate considerable employment opportunities compared to self-contained seniors housing dwellings as they are required to employ services such as nurses, allied health, cleaners, hospitality, medical specialists etc.
- Council’s Local Housing Strategy (LHS) proposes to permit seniors housing in R2, B1 and B2 zones only within 400 metres of several local centres in the Council area.
- Further opportunities for seniors housing will also be explored in “Centre Investigation Areas” within 800 metres of Brookvale, Manly Vale, Mona Vale, and Dee Why as part of current, or soon to commence, precinct planning in these areas.

Landscaped Area

- The reduction in landscaped area from 25sqm to 15sqm per unit in lieu of new communal space (inside and outside) may provide better resident amenity but should not be at the expense of landscape amenity and local character outcomes.

SURROUNDING LAND USE COMPATIBILITY CONTEXT ANALYSIS

11TH MAY 2022

AS REQUESTED IN 30TH MARCH, PANEL BRIEFING

A detailed context analysis has been prepared as noted in the panel briefing on 30th March.

(Please note you can click on numbers 1 to 24 on page 4 and this will take you to relevant building image)

This analysis demonstrates:

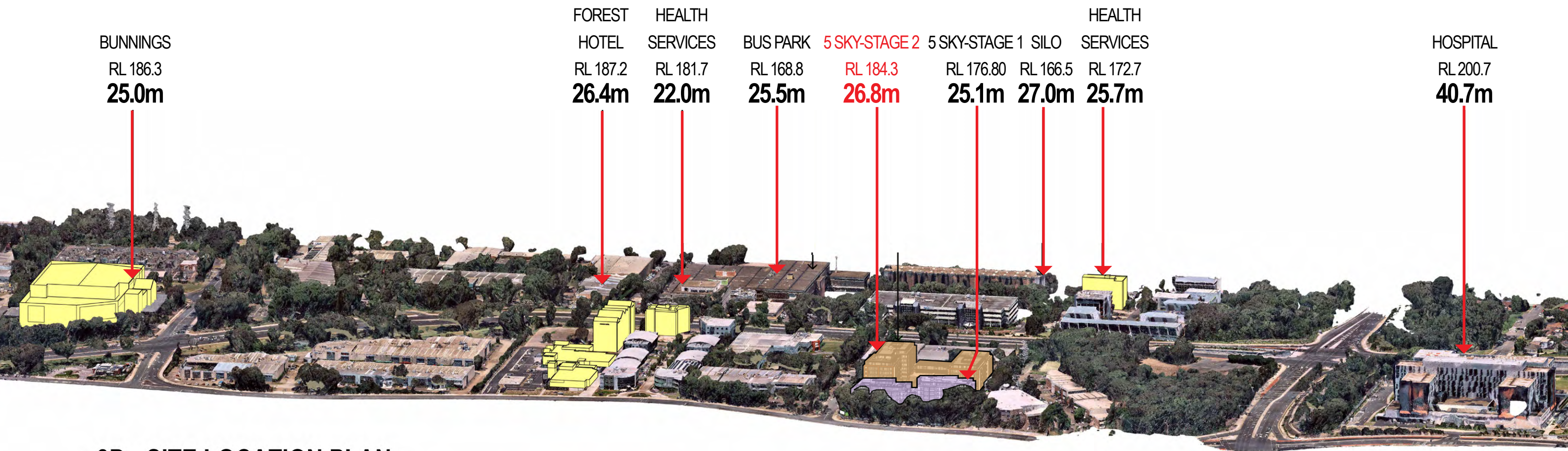
_There are no inherent land use conflicts within the B7 Zone that would preclude Seniors Housing of high amenity

_Rather, this analysis demonstrates that the B7 Zone is characterised by higher order commercial, health-related and supporting retail uses, which are complementary to the provision of Seniors Housing

_The emerging future character of the B7 Zone includes uses consistent with the strategic objective that it acts as a health and education precinct *(Appendix 1)*

_There is no evidence of noisy or polluting heavy industrial uses, which are prohibited within the B7 Zone *(Appendix 2)*

_The Housing SEPP, 26 November 2021, specifically identifies the B7 zone as being suitable for seniors housing and no longer requires a hospital to be permitted *(Appendix 3)*



3D - SITE LOCATION PLAN

_This image shows the maximum height of existing buildings and recent approvals (both absolute RL and metres above existing ground).

_The subject site - proposed at 26.8m - is clearly consistent with the emerging scale and character of the B7 Zone and is compatible with the prevailing height and scale of its immediate neighbours.

_Of particular note are the Forest Hotel (26.4m) at the eastern end of the locality and the Northern Beaches Hospital (40.7 m), which is a prominent landmark on elevated topography.

**INSTRUCTIONS:**

- Please click on the numbers from **1** to **24** to open the related building image
- When on the individual building Image please click on the button which states **BACK TO MAP** to return

For example - Building 13





**SCHOTT AUSTRALIA PTY.
TOOLEY
HUBER SUHNER**

**LABORATORY GLASSWARE AND MEDICAL SUPPLIER
AUTOMOBILE PARTS IMPORTER
CABLE SUPPLIES**

**8:30AM-5:30PM MONDAY -FRIDAY
8AM-5PM MONDAY-FRIDAY
8:30AM-5PM MONDAY-FRIDAY**



SKY RACING

MEDIA BROADCASTING

MONDAY TO SUNDAY 9AM TO 9PM



3 BACK TO MAP



KURTZ AUSTRALIA
HUBER SUHNER
IKON DOORS
COLDBUSTER:

EMBOSSING AND PLASTIC PRINTING
CABLE SUPPLIES
INSTALLATION OF PASSIVE FIRE PROTECTION SYSTEMS
HEATING EQUIPMENT SUPPLIER

8:30AM-5PM
8:30AM-5PM MONDAY-FRIDAY
8:30AM-5PM
8:30AM-5:30PM MONDAY-FRIDAY



NORTHERN BEACHES HOSPITAL

HEALTH SERVICES FACILITY

24 HOURS, 7 DAYS

5 BACK TO MAP



NORTHERN BEACHES HEALTH HUB

HEALTH SERVICES FACILITY

6AM TO 8PM MONDAY-FRIDAY



6 BACK TO MAP



ADEC PREVIEW SOLUTIONS
IMPRESSION TECHNOLOGY
OBT CONSULTING - UNIT
HARCOR SECURITY SEALS
EXPERTISE EVENTS

DOCUMENT SCANNING
DIGITAL TEXTILE PRINTING
COMPUTER CONSULTING
SECURITY SEALS FOR DRUGS & MEDICAL EQUIPMENT
EVENT MANAGEMENT

7AM-4PM MONDAY-FRIDAY
9AM-5PM MONDAY-FRIDAY
7AM-6PM MONDAY-FRIDAY
8:30AM-4:30PM MONDAY-FRIDAY
24 HOURS



MIELE EXPERIENCE CENTRE

SHOWROOM AND OFFICES

9AM- 5PM MONDAY-SATURDAY



DOUGLASS HANLY MOIR PATHOLOGY
OCCUPATIONAL THERAPY ‘HELPING CHILDREN’
SCENT THROAT SPECIALISTS
DENTIST TOOTH SPARKLER

PATHOLOGY
OCCUPATIONAL THERAPY
MEDICAL SPECIALISTS
DENTIST

8AM – 5PM MONDAY - FRIDAY
8AM-5PM MONDAY - FRIDAY
8AM-5PM MONDAY- FRIDAY
8.30AM-5PM MONDAY-FRIDAY

9

[BACK TO MAP](#)**NORTHERN BEACHES CANCER CARE****CANCER CARE SPECIALIST****8AM-4:30PM MONDAY-FRIDAY**



NORTHERN BEACHES CO-WORKING

BVG CONSULTANTS

MINDLIFE CLINIC

OFFICE PREMISES

STRUCTURAL ENGINEER

PSYCHIATRIST

24 HOURS 7 DAYS



BRELLAH MEDICAL CENTRE - GP, SPECIALIST DOCTORS
ALLIED HEALTH & FITNESS CENTRE 'MOVEMENT HQ'
SABRE CORPORATION

MEDICAL SPECIALISTS
GYM
BEAUTIFY TREATMENT DISTRIBUTION

9AM-5PM MONDAY-FRIDAY
9AM- 5PM MONDAY-FRIDAY
9AM- 5PM MONDAY-FRIDAY



CITIZEN WATCHES

OFFICE PREMISES

UNKNOWN



PENINSULA SLEEP CLINIC
NSW HEALTH PATHOLOGY
PENINSULA RESPIRATORY GROUP
GENESIS CARE
NORTHERN BEACHES BREAST CLINIC
SAZERELLI DESIGNS
TALKSHOP SPEECH PATHOLOGY

MEDICAL SERVICES (SLEEP CLINIC)
MEDICAL SERVICES
MEDICAL SERVICES
MEDICAL SERVICES
MEDICAL SERVICES
OFFICE PREMISES
SPEECH PATHOLOGIST

24 HOURS 7 DAYS
8AM-3:30PM MONDAY- FRIDAY
8AM-4PM MONDAY- FRIDAY
8AM-5PM MONDAY-FRIDAY
8AM-5PM MONDAY- FRIDAY
9AM-5PM MONDAY TO FRIDAY
8AM-6PM MONDAY TO FRIDAY



KWIK KOPY
INTERTEK
SPORTSPRO

PRINTING BUSINESS
OFFICES

8:30AM-5PM MONDAY-FRIDAY
UNKNOWN
9AM-5PM MONDAY-FRIDAY



FOREST ESPRESSO

BIRK & BLYME

GAP STUDIOS

RAY WHITE REAL ESTATE

IMK ACCOUNTING

OCCUPATIONAL THERAPY HELPING CHILDREN

FOOD AND DRINK PREMISES

TILE COMPANY

UNKNOWN

REAL ESTATE AGENTS

ACCOUNTANT

THERAPIST

6:30AM- 3PM MONDAY-FRIDAY

8:30AM- 5PM MONDAY-FRIDAY

UNKNOWN

9AM-5:30PM MONDAY-FRIDAY



BEAUTIFUL GROUP OF TRADES

NEUROCARE

GROWTH BUILT

POWER CLEAN AIR PRODUCTS

BUILDING SUPPLIER

MEDICAL CENTRE

SITE OFFICE

CLEAN AIR PRODUCTS

UNKNOWN

9AM-5PM MONDAY-FRIDAY

UNKNOWN

9AM-5PM MONDAY-FRIDAY



**CONSTRUCTION SITE - HEALTH SERVICES FACILITY
(GENESIS CARE)**

**HEALTH SERVICES FACILITY
(DA/2019/1419)**

7AM-7PM, 6 DAYS A WEEK



BACK TO MAP



DAN MURPHY'S
FOREST HOTEL

BOTTLE SHOP
FOREST HOTEL PUB

MONDAY- WEDNESDAY 9AM-8PM, THURSDAY-SATURDAY 9AM- 9PM
MONDAY TO SATURDAY 10AM - 12AM, SUNDAY 10AM - 10PM



APPROVED HOTEL/MOTEL ACCOMMODATION

HOTEL OR MOTEL ACCOMMODATION

24 HOURS 7 DAYS

20&21
BACK TO MAP



PLUS FITNESS

BICYCLES ONLINE

AUSSIE GEMS CHEERLEADING & GYMNASTICS

UNION JACKS HAIR

HUKILAU CAFÉ

ASCOMATION

DJO GLOBAL

AUSTRALIAN BIOTECHNOLOGIES

ROLAND DG

END GAME ESCAPE ROOM

GYM

BICYCLE SHOP

GYMNASTICS

HAIRDRESSER

CAFE

MANUFACTURING

WAREHOUSE AND DISTRIBUTION CENTRES

BIOTECHNOLOGY COMPANY

MANUFACTURING

ESCAPE ROOM

24 HOURS 7 DAYS A WEEK

VARIOUS HOURS (USUALLY 9AM-5PM MONDAY-FRIDAY)



GREENWOOD EDUCATION
PROAV SOLUTIONS
MY FIRST GYM
WIZZY WORLD

CHILDCARE FACILITY
AUDIOVISUAL - OFFICE AND STORAGE
CHILDREN’S GYMS
CHILDREN’S AMUSEMENT CENTER

7AM-6PM MONDAY-FRIDAY
9AM-5PM MONDAY-FRIDAY
9AM-6:30PM MONDAY-FRIDAY, SATURDAY 8AM-12PM
9AM-5PM MONDAY -SUNDAY



KFC

TAKE AWAY FOOD AND DRINK PREMISES

10AM-11PM MONDAY- SUNDAY



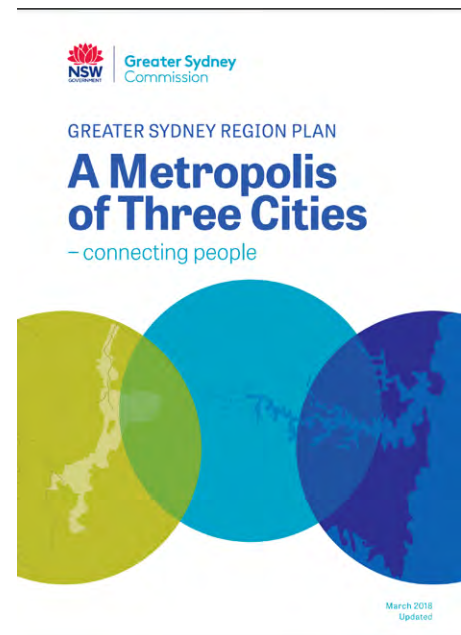
**APPROVED BUNNINGS
WAREHOUSE**

**HARDWARE & BUILDING SUPPLIES &
GARDEN CENTRE
(BUNNINGS WAREHOUSE)**

**6.00AM TO 10.00PM MONDAY TO FRIDAY AND 6.00AM TO
7.00PM SATURDAYS, SUNDAYS AND PUBLIC HOLIDAYS**

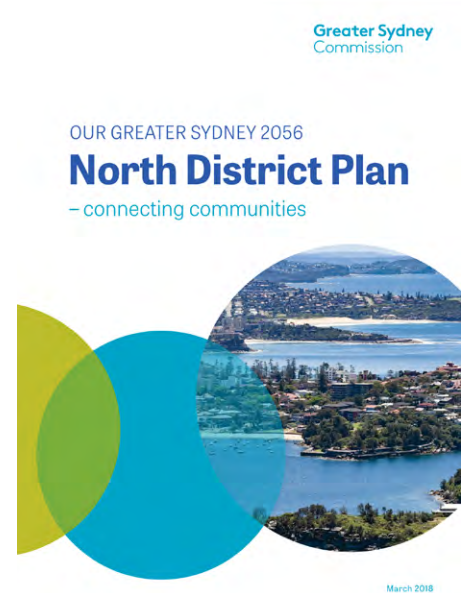
**NOISE FROM OPERATIONS MUST NOT BE HEARD AT ANY
RESIDENTIAL PREMISES OUTSIDE OF THESE HOURS
(CONDITION 4 DA2020/0717)**

BUSINESS PARK FUTURE OBJECTIVES AND STRATEGIC POLICY CONTEXT

**Greater Sydney Region Plan, A Metropolis of Three Cities (2018)**

The Plan identifies Frenchs Forest, as an emerging health and education precinct. The plan outlines a vision for health and education precincts as innovation districts that are:

“Transit-accessible precincts centred around health and education assets, surrounded by a network of medical research institutions, a mix of complementary industry tenants, housing, ancillary facilities and services”

**North District Plan (2056)**

Specifies The Northern Beaches Hospital development will be the anchor of the new health and education precinct in Frenchs Forest

The plan indicates that 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. The plan acknowledges the need to grow existing centres, including business parks, describing how creating jobs and providing services to local communities can be initiated within business parks.

(APPENDIX 2)

ZONE B7 BUSINESS PARK CURRENT OBJECTIVES/PERMISSABILITY - TAKEN DIRECTLY FROM WARRINGAH LOCAL ENVIRONMENT PLAN 2011

Zone B7 Business Park

Objectives of zone

- To provide a range of office and light industrial uses¹.
- 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 favourably 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.**

1. Light industry means a building or place used to carry out an industrial activity that **does not interfere with the amenity of the neighbourhood** by reason of noise, vibration, smell, fumes, smoke, vapour, steam, soot, ash, dust, waste water, waste products, grit or oil, or otherwise, and includes any of the following

- (a) high technology industry,
- (b) home industry,
- (c) artisan food and drink industry,
- (d) creative industry.

*(APPENDIX 3)*NSW STATE ENVIRONMENTAL PLANNING POLICY (HOUSING) 2021,
26th NOVEMBER**Chapter 1 Preliminary****1 Name of Policy**

This Policy is State Environmental Planning Policy (Housing) 2021.

2 Commencement

This Policy commences on the day on which it is published on the NSW legislation website.

3 Principles of Policy

The principles of this Policy are as follows—

- (a) enabling the development of diverse housing types, including purpose-built rental housing,
- (b) encouraging the development of housing that will meet the needs of more vulnerable members of the community, including very low to moderate income households, seniors and people with a disability,
- (c) ensuring new housing development provides residents with a reasonable level of amenity,
- (d) promoting the planning and delivery of housing in locations where it will make good use of existing and planned infrastructure and services,
- (e) minimising adverse climate and environmental impacts of new housing development,
- (f) reinforcing the importance of designing housing in a way that reflects and enhances its locality,
- (g) supporting short-term rental accommodation as a home-sharing activity and contributor to local economies, while managing the social and environmental impacts from this use,
- (h) mitigating the loss of existing affordable rental housing.

8 Relationship with other environmental planning instruments

Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency.

Part 5 Housing for seniors and people with a disability**Division 1 Land to which Part applies****79 Land to which Part applies**

This Part applies to land in the following zones—

- (a) Zone RU5 Village,
- (b) Zone R1 General Residential,
- (c) Zone R2 Low Density Residential,
- (d) Zone R3 Medium Density Residential,
- (e) Zone R4 High Density Residential,
- (f) Zone B1 Neighbourhood Centre,
- (g) Zone B2 Local Centre,
- (h) Zone B3 Commercial Core,
- (i) Zone B4 Mixed Use,
- (j) Zone B5 Business Development,
- (k) Zone B6 Enterprise Corridor,
- (l) Zone B7 Business Park,
- (m) Zone B8 Metropolitan Centre,
- (n) Zone SP1 Special Purposes,
- (o) Zone SP2 Infrastructure,
- (p) Zone RE2 Private Recreation



MATTHEW PALAVIDIS
VICTOR FATTORETTO
MATTHEW SHIELDS

20210014.8/1304A/R0/LA

13/04/2022

Platino Properties Pty Ltd
Suite 11
Level 2
20 Young Street
NEUTRAL BAY NSW 2089

Attn: Simon Militano

5 Skyline Pl, Frenchs Forest (Stage 2) - B7 Zoning Future Use Acoustic Assessment

1 INTRODUCTION

This letter has been prepared to assess the concerns of Northern Beaches Council regarding the potential of acoustic impacts on the proposed Seniors and Disability Housing development to be located at 5 Skyline Place, French's Forest, that may result from future business park uses within B7 Zoning. Council's concerns pertaining the proposal are presented below.

"Not Consistent

The siting of a residential development within a business park shall create inherent acoustic issues for occupants. Land uses permitted with consent in the B7 zone include, but are not limited to childcare centres, hardware and building supplies, light industry self-storage units and warehouses and distribution centres. These land uses generate more noise than residential development and frequently (if approved) operate 24/7.

The siting of the building in a business park creates an inappropriate relationship between land uses which will impact on the living conditions of occupants."

SYDNEY

9 Sarah St
MASCOT NSW 2020
(02) 8339 8000

ABN 98 145 324 714
www.acousticlogic.com.au

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\\SYD-
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ocx

1

Executive Summary

This letter presents our assessment of the worst acoustic scenarios which would potentially result from future uses in the B7 zone in the vicinity of the subject site. This assessment is based on modelling of hypothetical scenarios, as follows:

- A Child Care Centre located along eastern, southern and western of the project site.
- 24-hour distribution centres during the evening and night time periods, based upon conservative assumptions, as well as approved operational conditions of a similar use within the same business park, along eastern, southern and western of the project site. A Statement of Environmental Effects for a warehouse facility located at Lot 1 DP 220769, 8 Rodborough Road, Frenchs Forest Frenchs Forest (Amazon Distribution centre – 24/7 operations) has been referenced in this report to provide an example of the likely conditions that would be placed on any hypothetical future distribution centre approved within the B7 zoned Frenchs Forest Business Park.

Acoustic Logic notes that Stage 1 of the development, located directly to the North of the proposed site for Stage 2, has already been approved and determined by Council, and the contents of this letter relate to the Development Application for Stage 2 of the proposal.

Noise generation from worst-case scenarios, inclusive of operation approved by council for similar worst-case use, within the surrounding locality of the proposed residential development have been shown to be able to comply with relevant local, state and Australian statutory noise requirements provided appropriate service road design and locations. Hence, it has been shown within this report that the approval of 5 Skyline Place (Ref: REV2021/0045) does not significantly impact the ability of businesses to perform these operations noting previous council previous approval conditions on similar sites within the same B7 zone.

AL considers the acoustic impact of the project site on the operational potential of future B7 land uses in the surrounding business park as manageable.



19 April 2022

Simon Militano
Development Director
Platino
Suite 11, 20 Young Street
Neutral Bay NSW 2089

via email - simon@platino.com.au

Dear Simon,

MARKET COMPARISON EXERCISE
ADDRESS: 5 SKYLINE PLACE, FRENCHS FOREST NSW
OUR REF: KF02479

Executive Summary

We refer to email correspondence and our discussions, wherein Knight Frank NSW Valuations & Advisory have been requested to undertake a market comparison exercise on rental levels in the Frenchs Forest market and selected other market locations and sectors as outlined below.

In response to the recent enquiry, we make the following comments:

Summary of Leasing Evidence

The evidence noted herein represents the following ranges:

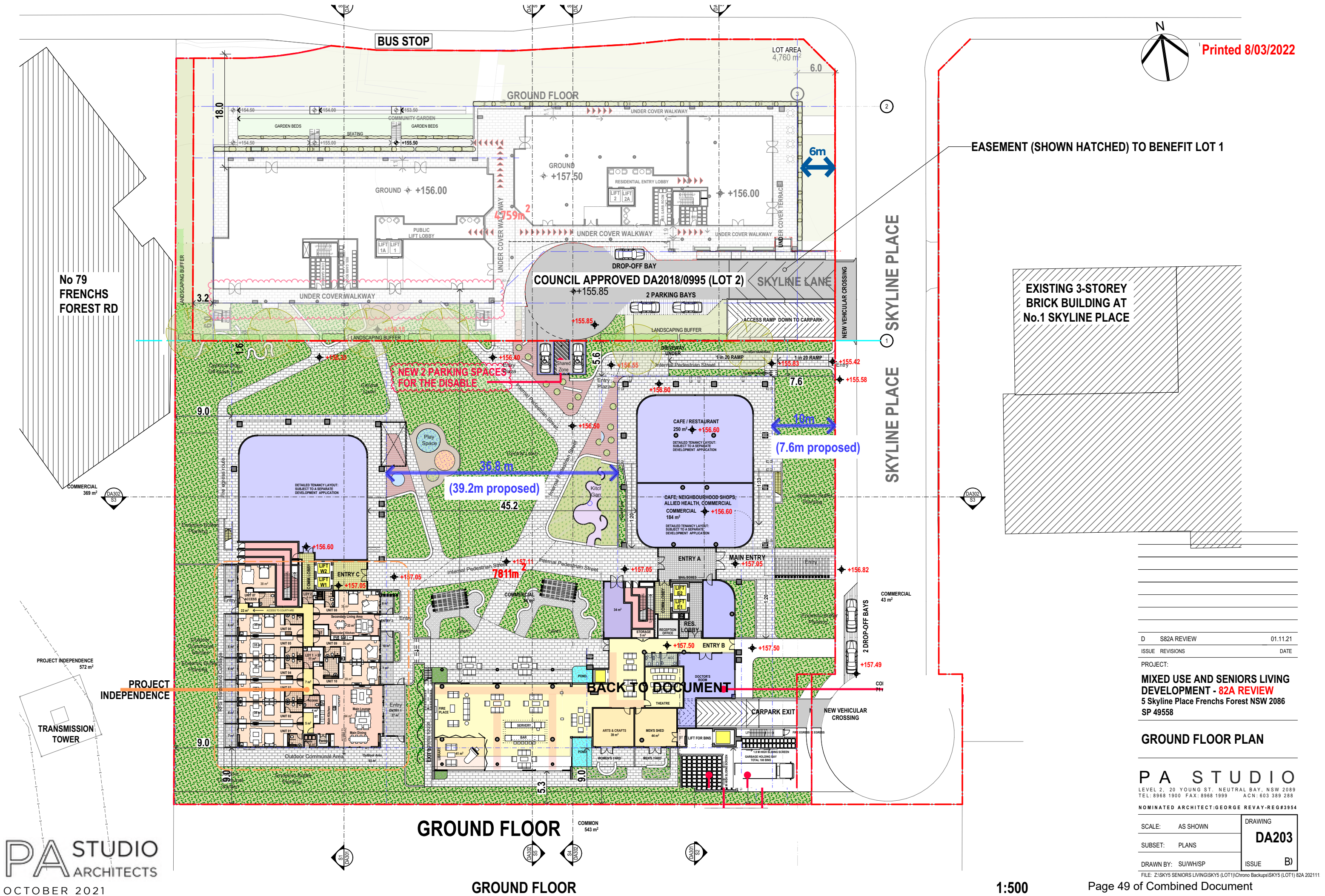
<i>Market Segment</i>	<i>Range (\$/sqm net face)</i>
Frenchs Forest business park: Office Accommodation	\$225 - \$375
Frenchs Forest business park: Warehouse and Warehouse/Office Accommodation	\$145 - \$225
Sydney Markets: Major Distribution Facilities	\$125 - \$180

As shown in the leasing evidence herein (outlined in the following pages) and the summary table above, the rates commanded for office accommodation are significantly higher than those for warehouse accommodation in the local market, which in turn are noted to be higher than those rates indicated by the larger warehouse/distribution facilities.

Given the permissible uses in the applicable town planning controls, as indicated by the Warringah Local Environmental Plan 2011, we would consider it more likely for higher value land uses such as commercial style premises to proceed within the local Frenchs Forest business park on a site such as the subject, in comparison to the distribution style uses which the evidence would indicate can command lower rental levels.

The details of the evidence and analysis are provided in the following pages.







PTW Architects
 Peddle Thorp & Walker P/L
 ABN 23 000 454 624

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 88 Phillip Street
 Sydney NSW
 Australia 2000

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NSW Architects Act
 Nominated Architects
 S Parsons Architect No. 6098
 D Jones Architect No. 4778

enough to allow the 'natural' split of one third young-old, one third middle-old and one third old-old. This allows the young-old and the middle-old to look after the old-old; for there to be grandchildren using the gym and pool and gardens; for someone to have a wide range of friends and acquaintances. The Humanitas model, which the Benevolent Society adopted and adapted for Australia, believe that this number is around 380 people.

Apartment Mix

The Benevolent Society brief for the Apartments for Life Bondi (which, though unbuilt, is credited with bringing the concept of aging- in place into the mainstream of the sector) had a minimum size of 1.5 bedrooms. This allowed for a carer to stay over when needed. Since that time (2011), the expectations of Baby Boomers are generally regarded to have increased: two bedroom apartments allow single people to have occasional visitors, the care of grandchildren and space for a study, ironing board etc. A three bedroom unit allows a couple to have the same amenity and separate bedrooms or studies. Therefore the mix of apartment sizes at 5 Skyline Place is considered appropriate for its socio-economic demographic market.

Lift Lobbies

For this sector, it is critical that lift lobbies contain two lifts to allow for redundancy as many residents will not be able to climb flights of stairs. In addition, the lift lobby and the corridor leading to the garbage room is a place of incidental social interaction.

However, this is generally a place of a "quick hello", "how are you?" Other than a generously scaled corridor width, it requires space for one or two chairs only to wait for the lift or perhaps wait for concierge assistance, if accidentally locked out of one's apartment. Socialisation occurs within apartments or within the communal areas of such a complex.

Seniors Housing Guidelines (November 2021)

Although designed before the introduction of the Seniors Housing Guidelines, the proposal reflects the relevant objectives of the Guidelines, particularly in the categories of:

- 01 Care for the planet
- 04 Care, wellbeing and community
- 05 Design for physical ageing and dementia
- 06 Good design.

Yours sincerely,

Diane Hatada Jones

Diane Jones
 Executive Director
 LFRAIA
 NSW Architects Registration No. 4778
 WA Architect Registration No. 2132
 Adjunct Professor BE UNSW

Sydney
 Beijing
 Shanghai
 Hanoi
 Ho Chi Minh City

Executive summary

HillPDA was commissioned by Platino Properties to undertake an economic impact assessment (the study) of a development application (hence referred to as the Proposal) for land located at 5 Skyline Place, Frenchs Forest within the Northern Beaches Local Government Area (LGA).

The Proposal encompasses 7,800sqm within the property boundary of 5 Skyline Place within Frenchs Forest Business Park. Development of the Proposal would provide:

- 98 seniors' units
- 10 independence studios
- around 973qm of commercial space
- a 6/12 storey building(s). Different buildings to have different heights to sensitively provide 'good design' throughout the site.

Currently, an existing two-storey commercial building is located on the site which provides around 3,955sqm of employment space. This is split between 1,385sqm of office and 2,570sqm of industrial space. Four tenants are in the building generating 44 jobs.

Frenchs Forest Business Parks capacity assessment

The ability of Frenchs Forest Business Park to attain the projected 2036 employment targets was assessed. The key findings of the capacity assessment are as follows:

- French Forest Business Park encompasses 56.5 hectares with the site occupying 1.2% of this total area.
- The Business Parks component of the wider Strategic Centre's employment targets by 2036, is estimated at a base of 900 jobs and a high of 1,900 jobs.
- The average employment density in the Business Park is currently 58sqm per worker which is less than half the average density of 23sqm per worker across four comparable business parks within Greater Sydney. This highlights the existing underutilisation of space and potential for increased employment in the Business Park.
- It is assumed that the Business Park would transition into a more efficient and higher order health and education precinct with a focus on supporting higher commercial

office uses. This is in accordance with the Northern Beaches Employment Study – Background Report.

- Sydney Olympic Park is forecast to have an employment density rate of 31sqm per worker, as identified in its master plan 2030. This employment density is likely more indicative of a health and education precinct and, as such, has been applied to assess the capacity of Frenchs Forest Business Park to meet its targets.
 - The Business Park contained 6,825 jobs in 2016. With the inclusion of the targets, this is forecast to increase to between 7,725 to 8,725 jobs by 2036. Assuming an average worker density of 31sqm per worker and a 5% vacancy rate, these jobs would require around 252,080sqm to 284,710sqm of space.
 - The existing buildings provide around 415,000sqm of employment space. This is sufficient to accommodate the Business Parks employment targets to 2036, with enough space for an additional 5,895 jobs. Hence the Business Park could accommodate 3-7 times the base and high strategic employment targets and, as such, the Proposal would have no effect on the employment objectives of the zone
 - It is unlikely that all the sites within Frenchs Forest Business Park would be redeveloped by 2036. To account for this, we have assumed that only 60% of the Business Parks theoretical maximum development capacity is realised.
- Under this scenario, the Business Park's development potential is between 339,000sqm to 508,500sqm. With only 252,080sqm to 284,710sqm being required, there is an excess in capacity under the base target of between 86,921sqm to 256,421sqm and between 54,289sqm to 223,789sqm under the high target.
- This excess space is enough to accommodate an additional 2,664 to 7,858 jobs above the base target (900) and 1,664 to 6,858 jobs above the high target (1,900).
- Consequently, the use of the subject site for a seniors development with associated employment in accordance with the Housing for Seniors or People with a Disability SEPP would likely have no effect on the employment objectives of the Business Park.
 - Regardless, the Proposal increases the employment on-site from 44 to 86 jobs, an addition of 42 jobs or 95%.

Economic benefits of the Proposal

The proposed development of the Proposal would have economic benefits during and post-construction. The following provides an estimate of these.

During construction

During the construction phase the economic benefits are estimated to be:

- **198 direct and indirect jobs years created with around 144 of these jobs going to residents in the Northern Beaches LGA**
- \$87 million in total economic output directly and indirectly created
- \$17 million directly contributed to the Northern Beaches economy (gross value added or GVA) and a total of \$32 million directly and indirectly contributed
- Around \$11.5 million in workers' wages directly and indirectly of which around \$8.3 million would go to residents of the Northern Beaches.

Post-construction

Upon completion the economic benefits resulting from development of the Proposal are estimated to be:

- **A total of 86 jobs, 42 more jobs over that already provided**
- \$5.3 million in wage generation per annum, a \$2.2 million increase over the current uses on-site
- \$6.5 million in GVA per annum to the local economy, an increase of \$1.5 million over the current uses on-site
- Local retailers would directly capture around \$1.3 million per annum from residents on-site. This would directly support the development, viability, and vibrancy of the nearby town centre. It would also directly support five local jobs
- **The Proposal would increase employment density on the land, supporting strong forecast growth in health sector jobs, and enhancing employment retention in the LGA**
- Constituting a more orderly and efficient use of the land which is more aligned with State planning objectives in a location which would benefit from the development of the nearby Hospital. Also, development would not affect the capacity of the Business Park to meet either its employment targets or planning objectives as an employment location.



State Environmental Planning Policy (Housing) 2021



New South Wales

Status information

Currency of version

Current version for 26 November 2021 to date (accessed 8 March 2022 at 15:54)

Legislation on this site is usually updated within 3 working days after a change to the legislation.

Provisions in force

The provisions displayed in this version of the legislation have all commenced. See [Historical Notes](#)

Does not include amendments by—

Sch 7, sec 3(3) of this Policy (Sch 7, sec 3(3) repeals Sch 7, sec 3(2) on 1.7.2022)

Editorial note

Schedule 8 of this Policy as originally notified instructed certain provisions of *State Environmental Planning Policy No 36—Manufactured Home Estates* to be transferred to this Policy as Chapter 3, Part 7. As indicated by the Part heading inserted in this Policy when it was originally notified, the provisions have been inserted into this Policy as Chapter 3, Part 8.

Schedule 8 of this Policy as originally notified instructed certain provisions of *State Environmental Planning Policy No 21—Caravan Parks* to be transferred to this Policy as Chapter 3, Part 8. As indicated by the Part heading inserted in this Policy when it was originally notified, the provisions have been inserted into this Policy as Chapter 3, Part 9.

Editorial note

The Parliamentary Counsel's Office is progressively updating certain formatting styles in versions of NSW in force legislation published from 29 July 2019. For example, colons are being replaced by em-rules (em-dashes). Text of the legislation is not affected.

This version has been updated.

Authorisation

This version of the legislation is compiled and maintained in a database of legislation by the Parliamentary Counsel's Office and published on the NSW legislation website, and is certified as the form of that legislation that is correct under section 45C of the *Interpretation Act 1987*.

File last modified 26 November 2021.

Note— Development permitted without consent may be subject to environmental assessment and approval requirements in the Act, Part 5.

7 Land to which Policy applies

This Policy applies to the State.

8 Relationship with other environmental planning instruments

Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency.

9 Suspension of covenants, agreements and instruments

- (1) For the purposes of enabling development to be carried out in accordance with this Policy or with a development consent granted under the Act, an agreement, a covenant or another similar instrument that restricts the carrying out of the development does not apply to the extent necessary to serve that purpose.
- (2) Subsection (1) does not apply to—
 - (a) a covenant imposed by a council or that the council requires to be imposed, or
 - (b) a biodiversity certification conferred under the *Biodiversity Conservation Act 2016*, Part 8, or
 - (c) a private land conservation agreement within the meaning of the *Biodiversity Conservation Act 2016*, or
 - (d) a relevant instrument within the meaning of the *Crown Land Management Act 2016*, section 13.4, or
 - (e) the relevant provisions of a land management (native vegetation) code, and the necessary mandatory code compliant certificate, for a set aside area under the *Local Land Services Act 2013*, Part 5A, or
 - (f) a conservation agreement within the meaning of the *National Parks and Wildlife Act 1974*, or
 - (g) a property vegetation plan within the meaning of the *Native Vegetation Act 2003* that is continued in force by the *Biodiversity Conservation (Savings and Transitional) Regulation 2017*, or
 - (h) a Trust agreement within the meaning of the *Nature Conservation Trust Act 2001* that is continued in force by the *Biodiversity Conservation (Savings and Transitional) Regulation 2017*, or
 - (i) a planning agreement within the meaning of the Act, Division 7.1, or
 - (j) a covenant in favour of Sydney Water Corporation or a water supply authority listed in the *Water Management Act 2000*, Schedule 3.
- (3) This section does not affect the rights or interests of a public authority under a registered

the following—

- (i) the amenities proposed to be provided to tenants residing in the building through common spaces and shared facilities and services,
- (ii) whether the configuration and variety of dwellings in the building will provide adequate options to prospective tenants in relation to the size and layout of the dwellings,
- (iii) whether tenants residing in the building will be able to relocate to other dwellings in the building that will better accommodate their housing requirements if their requirements change.

76 Active uses on ground floor of build-to-rent housing in business zones

- (1) The objective of this section is to ensure that, in relation to development for the purposes of build-to-rent housing, active uses are provided at the street level in business zones to encourage the presence and movement of people.
- (2) This section applies to development to which this Part applies if the development is on land in a business zone, including as part of a mixed use development.
- (3) Development consent must not be granted for development to which this section applies unless the consent authority is satisfied that a building resulting from the development will have an active street frontage.
- (4) An active street frontage is not required for a part of a building used for 1 or more of the following—
 - (a) entrances and lobbies,
 - (b) access for fire services,
 - (c) vehicular access.

77 Conditions requiring land or contributions for affordable housing

Nothing in this Part overrides a requirement to dedicate land or pay a monetary contribution under the Act, section 7.32.

78 Consideration of Apartment Design Guide for further subdivision of dwellings

Development consent must not be granted for development involving the subdivision of a residential flat building for which consent has been granted under this Part unless the consent authority has considered the relevant provisions of the Apartment Design Guide in relation to the part of the building affected by the subdivision.

Part 5 Housing for seniors and people with a disability

Division 1 Land to which Part applies

79 Land to which Part applies

This Part applies to land in the following zones—

- (a) Zone RU5 Village,
- (b) Zone R1 General Residential,
- (c) Zone R2 Low Density Residential,
- (d) Zone R3 Medium Density Residential,
- (e) Zone R4 High Density Residential,
- (f) Zone B1 Neighbourhood Centre,
- (g) Zone B2 Local Centre,
- (h) Zone B3 Commercial Core,
- (i) Zone B4 Mixed Use,
- (j) Zone B5 Business Development,
- (k) Zone B6 Enterprise Corridor,
- (l) Zone B7 Business Park,
- (m) Zone B8 Metropolitan Centre,
- (n) Zone SP1 Special Purposes,
- (o) Zone SP2 Infrastructure,
- (p) Zone RE2 Private Recreation.

80 Land to which Part does not apply—general

- (1) This Part does not apply to the following land—
 - (a) land to which *Warringah Local Environmental Plan 2000* applies that is located within locality B2 (Oxford Falls Valley) or C8 (Belrose North) under the Plan,
 - (b) land described in Schedule 3.
- (2) Nothing in Schedule 4 operates to preclude the application of this Part to land only because—
 - (a) the land is identified under *State Environmental Planning Policy (Coastal Management) 2018*, or
 - (b) in relation to land used for the purposes of an existing registered club—the land is described in another environmental planning instrument as—
 - (i) private open space, or
 - (ii) open space where dwellings or dwelling houses are permitted.

81 Seniors housing permitted with consent

Development for the purposes of seniors housing may be carried out with development consent—

key contribution in both addressing the current and deteriorating senior housing supply shortfall, whilst ensuring that the quality of new supply is sufficient to meet the standards demanded by the current market.

- The supply of ILU housing (Table 2) has been and continues to significantly lag behind demand. That shortfall is expected to grow by 275 ILUs over the next 5 years (2021-26) creating a cumulative shortfall of 623 units by 2026 which then continues to grow out to 2041 as the retiree age cohorts in the Northern Beaches grow. If the current low rate of supply continues, the cumulative shortfall will likely rise towards the 2,000 mark by 2041.

The calculated shortfall noted above takes into account supply to be provided from the Frenchs Forest Town Centre (Table 2) and any known approved pipeline (assuming this all proceeds). It assumes supply of 500 ILUs over 2026-41, in line with period rate supply over 2016-26.

- In the period 2016-21, the Northern Beaches Local Housing Strategy NBLHS (2021) report has only 128 ILUs being added to the stock – well short of the likely demand of the order of 400 ILUs in this period. However, this is not a new trend but the continuation of two decades of low additions to the stock of ILUs.
- The NSW Government projections (Table 1) for the Northern Beaches have its population forecast to grow from 265,450 (2016) to 296,650 (2041). More significantly, growth in the 55+ age in the Northern Beaches cohort is expected to account for over 100% of the growth in the Northern Beaches population over the next 15-20 years. Growth in the 70+ age cohort – the key driver of demand for ILUs – will be even faster, increasing by 56% by 2041.
- The majority of ILUs are over 30 years old and, with changing expectations, are becoming less attractive to potential downsizers.
- If we look at the pipeline of known proposed projects for new ILUs over the next 5 years (2021-26), there are about 200 if all projects proceed to completion, which is an optimistic assumption. Regardless, this number falls well short of estimates of demand of about 480. **Given the low levels seen in 2016-21 and over the past two decades, it seems clear that supply is not going to come close to matching the projected growth in demand. A growing shortfall seems inevitable.**
- In a largely developed urban area, with very few greenfield sites, finding and aggregating sites in established areas for redevelopment is an expensive proposition. If projects like that proposed by Platino are not to be allowed, then it is difficult to see the supply of ILUs – and SDAs - coming anywhere near matching projected growth in demand.
- If retirees and empty nesters are to be encouraged to sell large houses and downsize (which will facilitate Council's objectives to increase housing capacity) there needs to be a scope for new ILU product which makes it attractive for this market segment to downsize.
- If immediate action is not taken, then the projected senior housing supply shortage could generate significant stress, at a cost to future senior residents but also to future young households looking for housing options.

Our conclusion is that all of the above factors can be addressed through the approval of a modern, sustainable, and integrated senior housing development (such as the proposed retirement community) within the Northern Beaches.

foreseeable future. If immediate action is not taken, then the projected senior housing supply shortage could generate significant stress, at a cost, to future senior residents but also to future young households looking for housing options. In addition, given the manifest need for SDA housing, if immediate action is not taken to address that, it is going to impose a significant on-going detriment to the quality of life of disabled people.

Should you wish to discuss any of the information contained in this response, please contact Nigel Stapledon on 0403921644.

Yours sincerely,

Dr. Nigel Stapledon

Chief Advisor

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Ryan Brennan

Consultant - Economics

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Demand for seniors accommodation

Demand will increase for all types of seniors housing as an increasing proportion of the population is over 55. Seniors typically live in their own homes, retirement villages or nursing homes. Each provides a different level of care.

Healthy seniors who require limited support may choose to live in their own homes and receive occasional home care services.

Those with some functional impairment or who wish to live in a community setting may choose retirement villages.

These offer different levels of care: assisted living units provide additional care for those who need daily assistance, while self-contained living offers a lower level of assistance suited to more independent residents.

Seniors who have severe impairments and need higher levels of care may need to live in nursing homes, or residential aged care, where personal and nursing care are provided daily. We expect there will be a high level of demand for retirement villages and nursing homes by 2036.

Table 8:
Northern Beaches projected supply gap for seniors housing

	2016 (from ABS Census)	2036 (projection)	Difference (existing-projected)
Retirement villages – self-contained independent living units	4,196	6,256	2,060
Retirement villages – assisted living units	993	1,495	502
Nursing homes (beds)	1,500	2,265	765

Source: SGS, 2020.

An additional 128 self-contained independent living units have been developed since 2016¹³ helping to address some of these gaps for self-contained independent living units. This leaves additional demand of 1,716 self-contained units to 2036. Assuming a median of 81 units per development¹⁴ the demand is equivalent to around 21 new developments. There will also be additional demand for assisted living and nursing home units, though at a lower level than for self-contained units.

¹³ Based on Northern Beaches Council occupation certificate data.
¹⁴ Based on existing seniors housing development in the Northern Beaches.

Big Move 3

Strengthen the emerging health and education precinct

The town centre can be a place for people to kickstart or restart their career within a health and education precinct centred on a 21st century hospital.

Observations of health and education precincts around the world as well as an understanding of local demographics indicate the feasibility of:

- a mixed use town centre that supports retail, commercial, health and education uses
- commercial uses such as free-standing office floor space, including co-working space for start-ups, and other uses such as a medical hotel and an aged care facility
- capacity to attract around

2,000 jobs, primarily in the allied health, recreation, education and accommodation sectors in addition to the 2,000 jobs expected at Northern Beaches Hospital

- new uses in the underutilised adjacent business park, especially if better integrated to the new town centre and hospital.

The business park could potentially evolve as a medical-related corporate businesses park alongside the hospital and a potential tertiary education presence.

The proposed land use zoning includes a mix of retail, commercial and education uses.



Precinct land use	Approx. area
Retail	19,330m ²
General commercial, hotel and allied health services	16,310m ² *
University, training and research	8,185m ²
Retirement and respite day care	9,200m ²
Community, indoor sport, childcare and library	9,670m ²

*Up to 17,255 with additional permitted uses along Frenchs Forest Road West

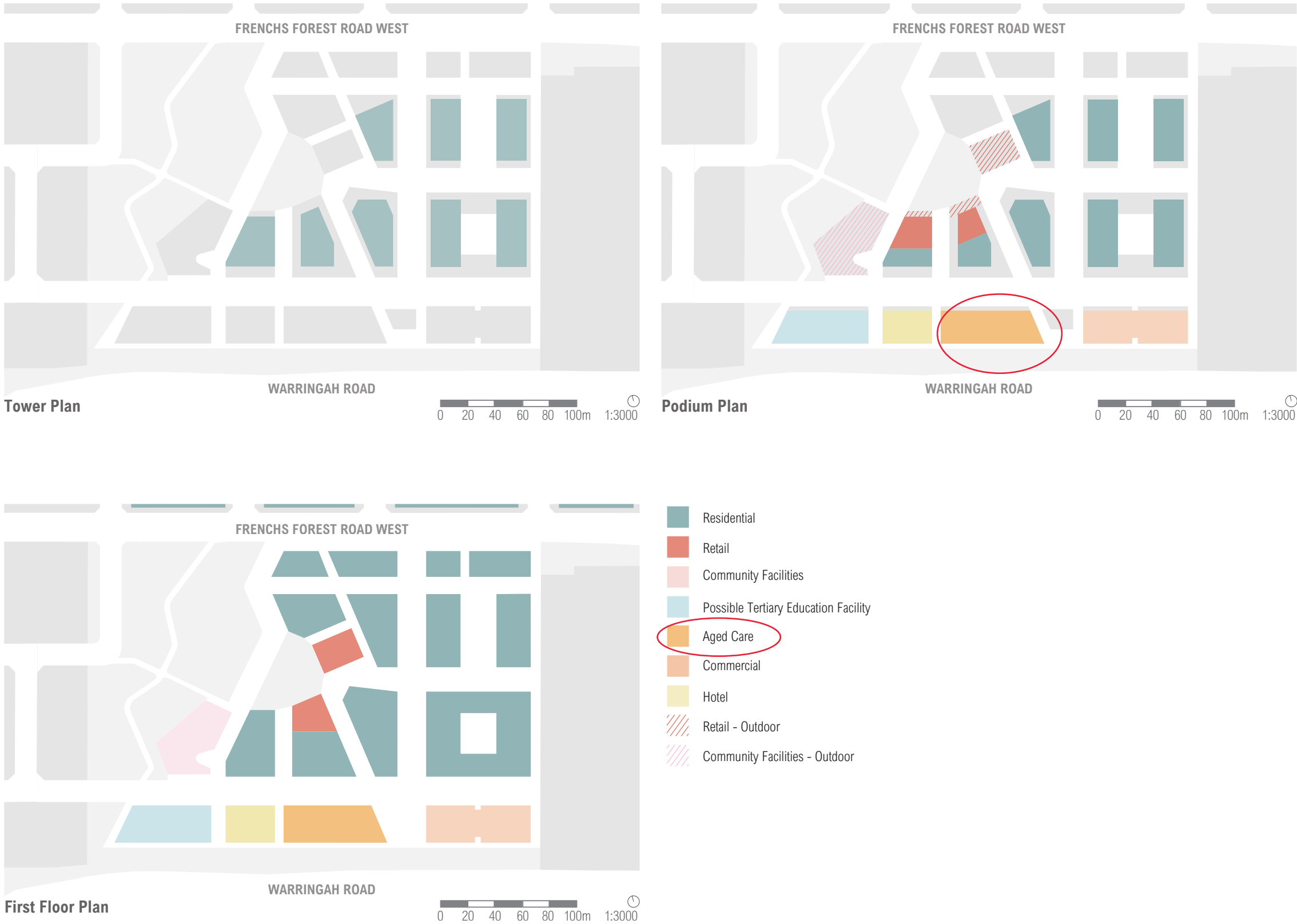
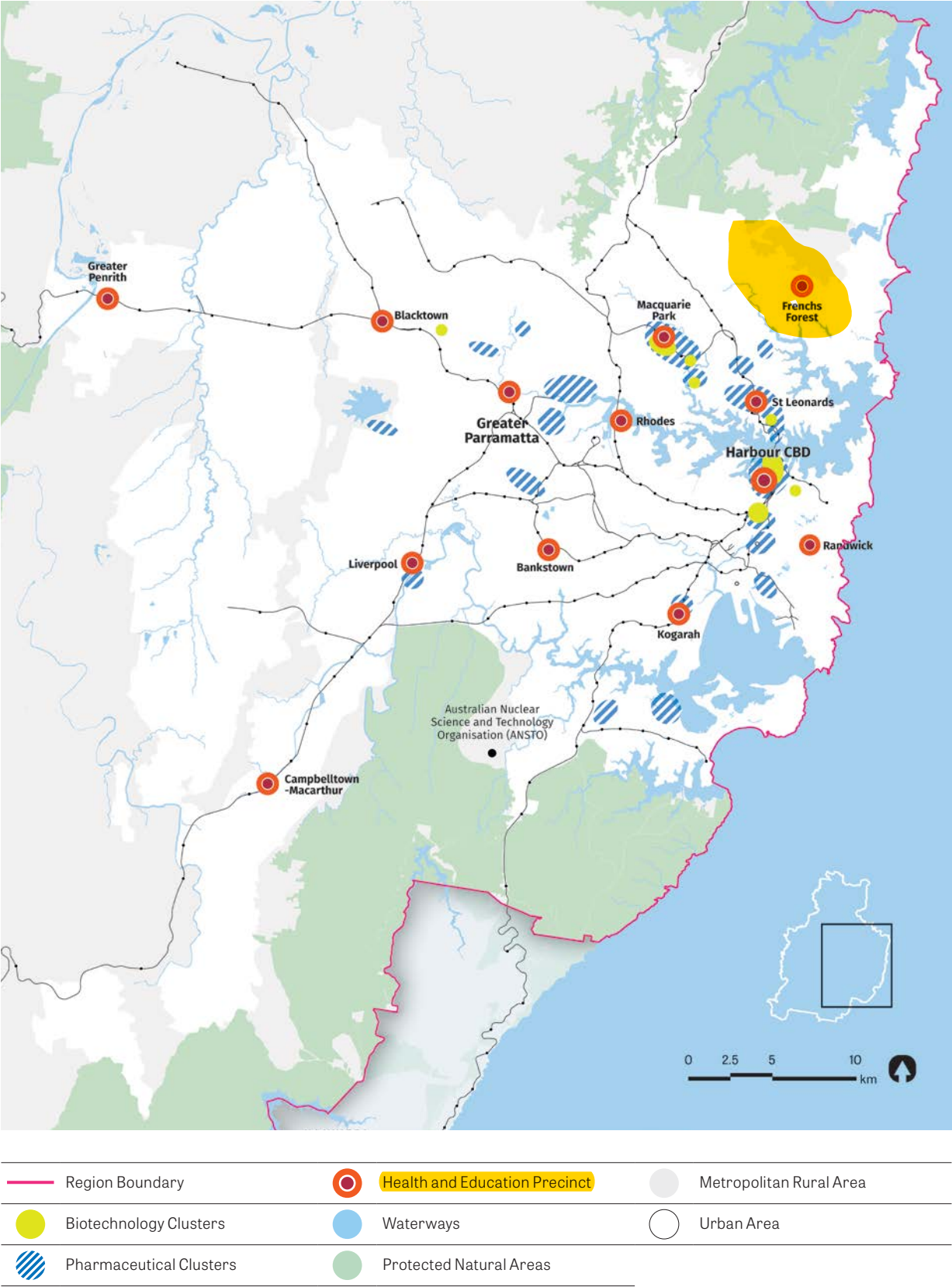


Figure 37: Health and education precincts



care, and implement preventative health measures. They will deliver strong social, environmental and economic benefits.

Local health and education facilities, such as local hospitals, local health services, TAFEs and schools play an important role in the community as places where people work, learn and access services.

From health and education cluster to innovation district

The most successful health and education precincts are internationally competitive and more accurately described as innovation districts³². **Innovation districts are transit-accessible precincts with an active ecosystem that includes health and education assets, surrounded by a network of medical research institutions, a mix of complementary industry tenants, housing, ancillary facilities and services. Economic productivity is created by the agglomeration benefits flowing from an active innovation ecosystem.**

A benchmarking study indicates that the evolution of health and education precincts follow a Maturity Pathway. As precincts evolve, the economic productivity of the precinct increases substantially. This corresponds to three general models, which become progressively more complex: Clusters, Precincts and Innovation Districts. This Maturity Pathway and the corresponding models are shown in Figure 38.

The identified health and education precincts are at different points along the Maturity Pathway and therefore need differing responses (refer to Figure 39). It is not expected that all precincts will achieve sufficient critical mass to develop into an Innovation District.

There are three key stakeholders in the development of health and education precincts – government, academia and industry. The role of these key stakeholders changes over time:

- **Government:** heavy initial investment in hospitals and infrastructure, with ongoing planning and policy support as precincts mature

- **Academia:** initial research collaboration or satellite training campus, expanding to a multi-disciplinary university campus which is co-located with the hospital and supports specialisation and innovation
- **Industry:** (anchor institutions) initial establishment of medical research institute with organic 'medtech' growth, supported by accelerators and venture capital firms; establishment of a new institute in a precinct will occur after consideration of the facilities necessary to accelerate the evolution of a cluster into an innovation precinct.

There are benefits from involvement of all three stakeholders to progress health and education precincts along the Maturity Pathway. It is recognised that health and education precincts each have relative competitive advantages influencing their capacity to progress along the Maturity Pathway, which can impact on investment.

The governance of health and education precincts may involve a Collaboration Areas approach. Collaboration Areas provide a governance and a policy framework to coordinate place-based innovation and investment.

Governance arrangements for Collaboration Areas will vary from precinct to precinct but will usually be formed around the following principles:

- **Government:** strategy setting and infrastructure coordination
- **Anchor:** asset owners and operators with long-term investment plans
- **Precinct-shaping projects:** projects involving one or more of the anchors aligned to deliver against broader precinct objectives.

Strategy 21.1

Develop and implement land use and infrastructure plans for health and education precincts that:

- create the conditions for the continued co-location of health and education facilities, and services to support the precinct and growth of the precincts
- have high levels of accessibility
- attract associated businesses, industries and commercialisation of research
- facilitate housing opportunities for students and workers within 30 minutes of the precinct.

Planning Priority N11
Retaining and managing industrial and urban services land

In giving effect to *A Metropolis of Three Cities*, this Planning Priority delivers on the following objective and the corresponding strategies:

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

Greater Sydney’s existing industrial, manufacturing, warehousing and distribution facilities contribute to its role as Australia’s manufacturing capital. These activities occur on industrial land that also accommodates urban services, freight and logistics services and advanced manufacturing. In some areas industrial and urban services activities are accommodated in business zones.

Urban services include activities such as motor vehicle services, printing, waste management, courier services and concrete batching plants. These activities serve local communities and businesses, and require adequate access to industrial land across the District. Demand for this land will increase commensurate with population growth. Good local access to these services reduces the need to travel to other areas, minimising congestion on the transport system.

In the North District, given the limited supply of industrial and urban services land and the inability to increase the supply, industrial and urban services land needs to be safe-guarded and efficiently managed.

Industrial land supply

The North District has the lowest amount of industrial land in Greater Sydney and the highest proportion of the land used for urban services.

The North District has 572 hectares of industrial and urban services land, spread over 43 precincts¹⁹ (refer to Figure 17). This represents four per cent of Greater Sydney’s total stock of industrial and urban services land. Only approximately seven per cent (39 hectares) is undeveloped, indicating strong demand for this scarce resource.

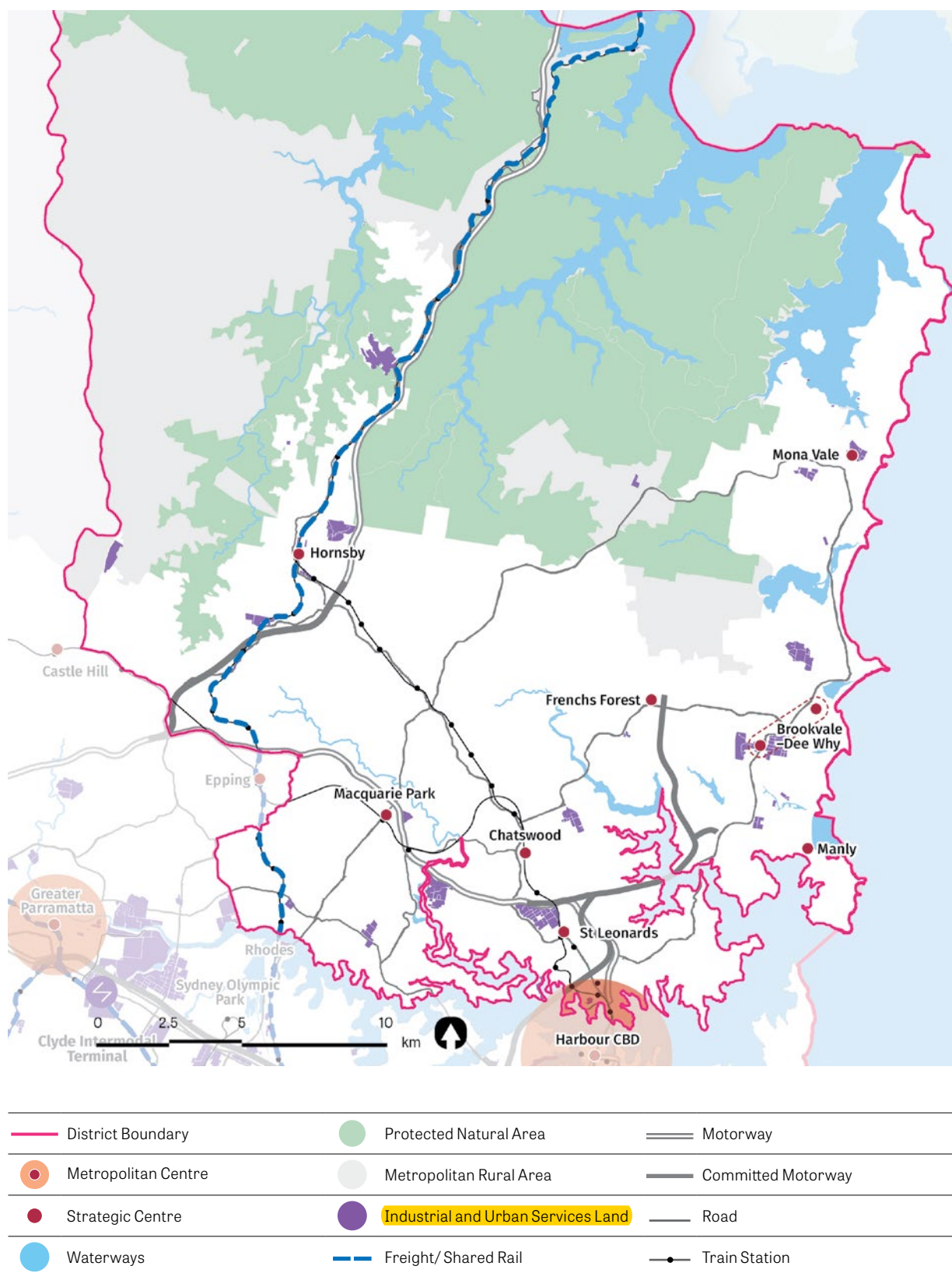
This land contributed approximately \$ 7,905 million or three per cent to NSW Gross Domestic Product in 2015²⁰. It also accommodated for approximately 68,000 jobs (four per cent of jobs) in the District.

Table 4: North District largest industrial and urban services precincts

LGA	Precinct	Undeveloped Land (ha)	Developed Land (ha)	Total (ha)
Hornsby	Asquith	5	39	44
	Mount Ku-ring-gai	9	57	66
Lane Cove	Lane Cove West	6	45	51
Northern Beaches	Brookvale	0	86	86
	Cromer	0	44	44
Willoughby	Artarmon	4	61	65

Source: Department of Planning and Environment, 2017, *Employment Lands Development Program, 2017 Report*, NSW Government, Sydney.
Note: Figures are rounded to the nearest whole number

Figure 17: North District industrial and urban services land and freight assets





Crows Nest

The lower end of the range of these job targets reflects the baseline of projected jobs growth anticipated in the centre, while the upper end is an aspirational higher growth scenario to reflect outcomes in the case of future investment and land use planning in centres.

Principles for Greater Sydney's centres

As Greater Sydney's population grows over the next 20 years, there will be a need to grow existing centres, particularly strategic centres and supermarket-based local centres, create new centres including business parks, and attract health and education activities into centres. The principles for developing new centres are:

- **Existing centres:** Expansion options will need to consider building heights and outward growth. In some cases, directly adjacent industrial land may be appropriate for centre expansions to accommodate businesses. Quality design and adequate infrastructure provision is critical to enable expansions. This approach needs to be informed by local government industrial strategies.
- **New centres:** These will be required across the whole of Greater Sydney.
- In land release areas, planning is to identify a range of centre types, including large and small local centres which could grow and evolve into new strategic centres and planning should maximise the number and capacity of centres on existing or planned mass transit corridors. To deliver this latter outcome centres need to be identified early to allow their incorporation into transport infrastructure plans.
- In established areas, innovative approaches to creating new centres are likely to be part of urban renewal and mixed-use developments.
- All new centres are to have good public transport commensurate with the scale of the centre.
- **Business parks:** 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.**

BACK TO DOCUMENT



Mr Simon Militano
Development Director – Over 55's Development
Platino Properties
Suite 11, 20 Young St, Neutral Bay,
NSW, 2089
4 May 2022

Dear Simon,

Subject: Affordable Housing Assessment - Stage II - Jardin Frenchs Forest

Further to your instructions, Hill PDA has been asked to assess the public benefit of the 15 Social (Disability) and Affordable Housing apartments to be dedicated, at reduced market value, to a community housing provider (CHP) in Stage II of the Jardin Frenchs Forest development located at 5 Skyline Place Frenchs Forest. In formulating our assessment, we have assessed the public benefit to be the revenue forgone from the agreed sale price to that of the potential market value (the discounted value). **This is a similar approach to that of Department Housing and Australian Tax office in assessing the social /fringe benefit of a social housing rent compared to a market rent.**

Executive Summary

We consider the Total Market Value of the 15 Social (Disability) and Affordable Housing apartments to be \$11,200,000 on an "As If Complete" basis.

Our advice is that a CHP will acquire 15 apartments (& common areas allocated) with a fair Market Value of \$11,200,000 for \$4,00,000. **The value of this Public Benefit is \$7,200,000** and the developers (Platino) will forgo \$7,200,000 in revenue to provide **this Public Good component**.

The benefits for broader community are significant, some of which are outlined below:

- Providing opportunities for people aged over 55 or those with a modest intellectual disability, to obtain ownership opportunities and control of their accommodation requirements, enhancing independence and self-esteem.
- Targeting independent living for women over the age of 55 which will reduce dependence on Community Housing and provide ownership opportunities.
- Targeting independent living for people with a modest intellectual disability (particularly younger people) seeking to live independently within the community which will reduce dependence on Community Housing and provide ownership opportunities.
- Younger members of the community would be highly sort after as the suggested plan provides an intentional blending of the socio-economic, age range cohort, and health status mixing of the development's residents within the Jardine development is considered as a beneficial addition to the community dynamic.
- Increasing the opportunity to provide affordable accommodation options for 'worker aged' residents to encourage personal empowerment and provide community housing opportunities.

We consider that the developer's proposal is a significant financial contribution to assist the essential affordable housing needs for Seniors and People with a Disability in the Northern Beaches Community.

We thank you for your instruction in this regard and please do not hesitate to contact the undersigned if you have any further questions.

Yours sincerely,



Christopher Sutton AAPI
Valuer

Certified Practicing Valuer

suttonchrisj@gmail.com



Martin Hill AM

Director

BSc (Hons), Master of Real Estate (UNSW),

Master of Property Development (UTS),

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Ref: SY210080-00-SE-LE1-1
06 April 2022

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Dan Keary

Keylan Consulting Pty Ltd
Suite 1, Level 1
1 Rialto lane
Manly NSW 2095

Dear Dan,

Re: Jardins Seniors living - Sustainability Ambitions

Northrop have been engaged by Platino properties to prepare a report to outline the sustainability objectives of the new Jardin development located at Lot 1, 5 Skyline Place.

Northrop have prepared a Sustainability Planning report that accompanied the Development application, this letter further cements the Sustainability credentials planned for this project.

The development is currently aiming to achieve the following;

- Green Star Building – Achieve a 5 Star rating
- Green Star Communities– Achieve a 5 Star rating

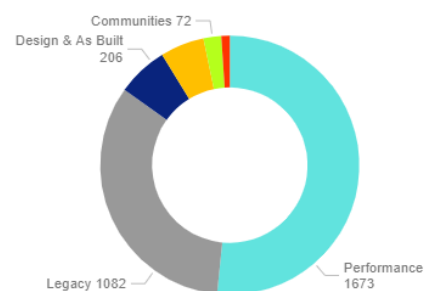
Upon undertaking further research, it has been confirmed that **this development will be the first Vertical Village to offer life style and affordable housing accommodation to be rated under both Buildings and Communities under the Greenstar rating system.**

The images below outline key statistics from the via the Green Building Council of Australia (GBCA) Project directory;



Overlay of Community rated projects in Australia

Certified Ratings Issued by Tool



Certified Rating – Sorted by type

This is an exciting aspiration that it embedded in the project vision, and demonstrates Australian Best practice in the industry. Should you have any queries, do not hesitate to contact the undersigned.

Amir Girgis
Principal | Sustainability Manager
On behalf of Northrop Consulting Engineers Pty Ltd