APPLICANT RESPONSE TO SEPP65 QUALITY DESIGN PRINCIPLES & DESIGN VERIFICATION STATEMENT

re: DA / 1892 / 2013

ELEEBANA SHORES - RETIREMENT VILLAGE DEVELOPMENT 40 & 48 BURTON ROAD MOUNT HUTTON NSW 2290

Proposed Development Context Aerial View (source: Nearmap)

Proposed Streetscape Impression

Proposed Internal Street Impression

Prepared by EJE Architecture
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Ref: 9861-DA-SEPP65 Report [1]

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EXECUTIVE SUMMARY of APPLICATION

The retirement village development is proposed to be undertaken on a 12 acre site, zoned primarily 1(2)-Rural Living. This usage is supported under SEPP (Housing for Seniors or People with a Disability) - 2004, As the land is adjacent to land zoned primarily for urban purposes (i.e. the Eleebana residential community). In addition, under Clause 41 of the Lake Macquarie LEP, retirement village development is allowed on land within 400 metres of residential 2(1) zone land, and the site is within 10m of 2(1) zoned land.

The SEPP arose on the basis of the significant shortage of retirement living options in NSW, and looks to both free up additional land for appropriate development & increase development density on that land. The SEPP allows a 0.5:1 FSR, but the proposed development is based on about a 0.25:1 FSR only (i.e. about 50% of the 'allowable' density).

An independent retirement village and aged care expert, Stan Manning OAM, concluded (as per the report submitted with the DA) that there is a shortage of something in the order of 900 retirement villages homes in the area surrounding the site. The positive Lake Macquarie Strategic Planning response to the proposed development (as attached in Appendix B of this report) acknowledges that there are relatively few opportunities for retirement living development in the Charlestown/ Belmont areas.

The Lake Macquarie Strategic Planning response is also supportive of the development of the 2-storey apartment units within the overall development site, correctly identifying that this offers greater diversity in retirement living options,

To provide the best basis for retirement living (i.e. correct level and type of amenity and services, including aging-in-place), developments cannot generally succeed without 100+ homes. With less than this, the cost of amenity and services/ home becomes prohibitive, or the development deficient. The Stan Manning report highlights how important the correct levels of service and amenity are and suggests the proposed development has the right mix.

Careful thought has gone into the placement and design of the apartments. You will see in the following report (i.e. streetscape impressions), that the 2-storey apartment blocks are almost invisible from outside the site. The internal landscaping has also been designed to soften the scale of the 2-storey apartment blocks, and maximise their ascetics and aspect within the site.

Careful thought has also gone into the design of the apartments, in terms of their fit within the neighbourhood, their consistency and balance with the single-storey dwellings, and the specific site aspects. Strong attention has also been paid to aging-in-place and access issues, maximising light and solar access, as well as great liveability.

The following report responds to the requirements of SEPP 65 - Design Quality of Residential Flat Development.

INTRODUCTION

In line with State Environmental Planning Policy (SEPP) 65 – Design Quality of Residential Flat Development, all new residential flat buildings (i.e. with 3 or more storeys, and 4 or more self-contained dwellings) within New South Wales (NSW) must respond to the design principles and objectives of SEPP 65 and be detailed via an accompanying report.

The proposed Retirement Village development, designed for compliance with SEPP (Housing for Seniors or People with a Disability) - 2004, consists of 101 seniors-living dwellings, made-up of 61 detached or semi-detached single-storey villas, and 40 x 2-storey apartment dwellings with basement level parking under (proposed as 4 x separate typical 'apartments blocks', consisting of 10 apartments per block, located towards the rear of the site), and an on-site Rec Centre, generally as shown in Figure 1 below.

Figure 1 - Proposed Site Plan

The proposed apartment blocks generally don't meet the definition of a 'residential flat building' as outlined in SEPP 65, as the proposed buildings are only 2-storey in height, with the basement parking level generally not protruding more than 1.2m above the finished ground level.

This report therefore provides supplementary information in association with the documentation already lodged for DA/1892/2013, as requested by LMCC.

The primary focus of this report will be in relation to the proposed apartment blocks, rather than the single-storey villas, which are not subject to the requirements of SEPP 65.

SEPP 65 Aims & Objectives

To improve the design quality of residential flat development in NSW, via the utilisation of good design principles. These principles, as referred to in the SEPP are listed and discussed below.

1. CONTEXT
2. SCALE
3. BUILT FORM
4. DENSITY
5. RESOURCE, ENERGY & WATER EFFICIENCY
6. LANDSCAPE
7. AMENITY
8. SAFETY & SECURITY
9. SOCIAL DIMENSIONS
10. AESTHETICS

This document outlines the response to the above SEPP65 Aims and Objectives.

1.0 CONTEXT

PRINCIPLE (as taken from SEPP 65).

"Good design responds and contributes to its context. Context can be defined as the key natural and built features of an area.

Responding to context involves identifying the desirable elements of a locations current character or, in the case of precincts undergoing transition, the desired future character as stated in planning and design policies. New buildings will thereby contribute to the quality and identity of the area."

The desirable elements of the local area, which add to Mount Hutton's present context, are as follows:

- The lake (sand and surf)
- The coastline (sand and surf)
- Mixed urban & semi-rural residential atmosphere
- Relaxed feel
- Lakeside village nature
- The natural environment
- The built environment
- Nearby services & facilities
- Excellent climate

The proposal concentrates upon achieving both design and environmental excellence whilst working to the aims of the current statutory controls. This primarily relates to SEPP (Housing for Seniors or People with a Disability) – 2004, and also includes the requirements of LMLEP (Lake Macquarie Local Environmental Plan) 2004 and LMDCP (Lake Macquarie Development Control Plan) 2012.

The proposal responds to the existing context by addressing the key features of the area and via its design credentials. With the proposal's mixed urban and semi-rural residential location, we have aimed to reinforce the 'feel' of the context via an appropriate land use which utilises the surrounding established services and facilities, whilst respecting the built character through an appropriately designed architectural language, as discussed in the following sub-sections of this report.

1.1 Land Use

The proposed development is located on Burton Road in Mount Hutton, on land zoned 1(2)-Rural (Living), and in part within a 7(5)-Environmental (Living) zone. The development's site combines 2 separate sites, which at present are used as individual residences on each parcel of land, with the rear of each site being used for equine purposes.

Land to the north and east of the site comprises of small semi-rural residential allotments, with individual single or 2-storey dwellings on land zoned 1(2) and/or 7(5).

Construction of a 57 dwelling Retirement Village is currently progressing on land opposite the site, across Burton Road to the west, on land zoned 1(2), as shown in Figure 2 following.

The subject site is within 400m of 2(1)-Residential zoned land to the south, which comprises of urban residential development, and a facility providing Tourist Accommodation/Function Centre/Restaurant and two rural living allotments on 1(2) zoned land.

The surrounding Mount Hutton suburb is an area subject to continual growth, with new residential subdivisions being developed, in particular to the north of the site, along Warners Bay Road and Lamington Drive off Burton Road. Refer to the following aerial view of the proposed development in the context of the surrounding sites.

Figure 2 - Proposed Contextual Siting (source: Nearmap)

As outlined in LMCC's (lake Macquarie City Council) IP (Integrated Planning)-Strategic Planning Referral Response (ref. 00377526.doc) for the subject DA, the development *"site is within a broader precinct that is likely to come under increasing pressure for rezoning for urban (rather than rural residential) purposes."* This 'response' also states that *"the current non-urban zoning makes seniors housing an attractive development option for the land from an economic perspective."* It also mentions that *"approval of the subject application would not lead to development 'creep' without rezoning of adjacent land."*

The submitted development proposal can therefore be considered an appropriate form of land use for the site, as it is a use that is permitted by the SEPP in this location to meet an identified need for seniors housing in the state, and especially in the Lake Macquarie East area, and a Retirement Village is permitted on the land by clause 41 of the LEP. Furthermore, the submitted DA has received a favourable response from Council's Strategic Planners, it reflects the development trend which is currently occurring on the development site opposite to the west, and it also echoes the dominant residential land use of the surrounding context.

1.2 Services & Facilities

The subject development site is located on the south-western fringe of Mount Hutton, with the suburbs of Eleebana, Warners Bay, and Tingara Heights adjoining. The site is also within close proximity (approx. 2.5Km) to the waterways of Lake Macquarie and it's foreshore parks and recreation areas.

A public bus route passes the site, with a 'bus stop' located at the front of the site on both sides of Burton Road. This bus route allows residents of the development proposal ready access to the close by (approx. 2Km) "Lake Fair" shopping centre at Mount Hutton, "Warners Bay Village" (approx. 3Km), and the nearby (approx. 6Km) regional shopping centre of "Charlestown Square".

Refer to the architectural drawings, A001 (an extract from A001 is shown below in Figure 3) and A002, submitted with the DA, for a detailed analysis of the prevailing site conditions.

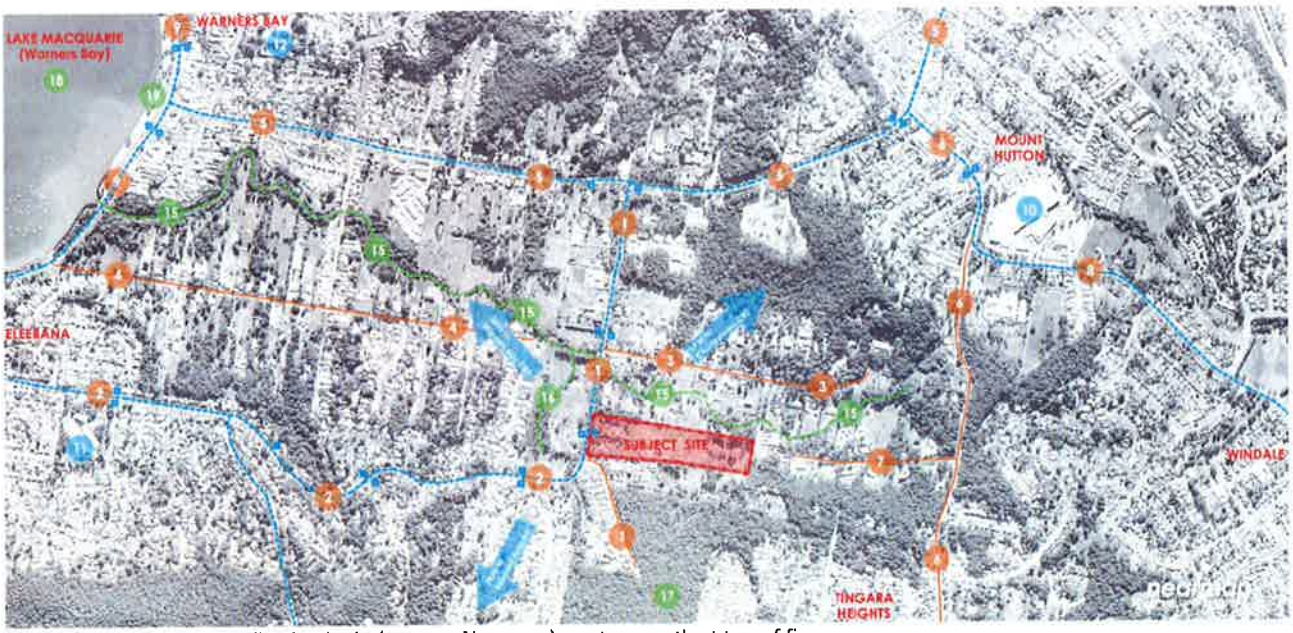

Figure 3 - Proposed Locality Analysis (source: Nearmap) - note:– north at top of figure.

The proposed development site can therefore be considered as a desirable location for a Retirement Village project, as its context contains suitable services and facilities in close and accessible proximity.

1.3 Built Character

In relation to the context of the current built character of the surrounding sites in close proximity to the development site, a mixture of large single and 2-storey urban and semi-rural dwellings surround, with a 'conventional' residential architectural language. The following Figure 4, highlights the sites on which 2-storey buildings currently prevail, which generally make-up around half of the surrounding sites, located predominantly to the north and east of the subject site.

Note:- streetview photographs of all of the sites highlighted in Figure 4 below are also shown in Appendix A of this report.

Figure 4 - Surrounding Sites with 2-Storey Buildings/Dwellings (source: Google Maps 2013)

The proposed apartment buildings have been designed to reflect the context of this surrounding built character, by limiting the height of these apartment buildings to only 2-storey, with basement parking under, and separating the massing of the apartments into 4 separate blocks of similar size to the surrounding large dwelling footprints.

The proposed siting of these 2-storey apartment blocks within the rear portion of the site, again reflect the siting of the majority of the surrounding sites with 2-storey structures (i.e. adjoining the rear boundary of the development site), and also maintain the single-storey context of the existing streetscape along Burton Road, as shown in Figure 5 following.

Figure 5 - Proposed Streetscape Impression

The architectural language of the proposed development, including the apartment buildings, further reflects the surrounding context via the utilised 'conventional' hip roof forms and the proportioning of the facades, as generally shown in the following Figure 6 (Typical Apartment Block Elevation).

Figure 6 - Typical Apartment Block North Elevation

1.4 Anticipated Primary Catchment of Development's Occupants

A further desirable element of the subject site's context, are the established residential suburbs that surround the site. These adjoining suburbs will assumedly provide the majority of occupants expected to reside in the proposed Retirement Village.

In the "Analysis of Demand for Seniors Living Retirement Housing" report submitted with the DA, as prepared by Stan Manning & Associates dated November 2013, *"experience and research data shows that up to 70% of residents in a Retirement Village will come from the 'local' area (in such an area as Mount Hutton this will be within a radius of 10km of the site)."*

Therefore, the context of the site's surrounding established residential suburbs make the subject site a desirable location for this proposed development use, where the expected occupants will be able to have a 'smooth' transition from their current 'family home' to this serviced Retirement Village in a 'familiar' environment. The location of the site will also provide the advantage of enabling ready access for visiting families of the village's occupants, as they will also most likely reside within close proximity to their original 'family home' or relative, further enhancing the lifestyle of the users of the facility.

2.0 SCALE

PRINCIPLE (as taken from SEPP 65)

"Good design provides an appropriate scale in terms of bulk and height that suits the scale of the street and the surrounding buildings.

Establishing an appropriate scale requires a considered response to the scale of existing development. In precincts undergoing a transition, proposed bulk and height needs to achieve the scale identified for the desired future character of the area."

As previously mentioned in Part 1.3 (Context) of this report, the scale of the current built character of the surrounding sites in close proximity to the development site, is a mixture of large single and 2-storey urban and semi-rural dwellings (also refer to the previous Figure 4 for the location of 2-storey buildings).

The proposed apartment buildings have therefore been designed to reflect the scale of this surrounding built character, by limiting the height of these apartment buildings to only 2-storey, with basement parking under, as indicated in the internal streetscape impression in Figure 7 below.

Figure 7 - Proposed Internal Street Impression

The scale of the proposed apartment buildings has been further developed to respond to the surrounding built scale, by separating the 'massing' of the apartments into 4 separate blocks, to reflect a plan scale that is similar to the surrounding large dwelling footprints, as generally shown in Figure 8 below.

Figure 8 - Proposed Footprint Scale in Relation to Adjoining Existing Footprints (source: Nearmap)

The siting of the proposed 2-storey apartment blocks towards the rear portion of the site, again reflect the siting of the majority of the surrounding sites with 2-storey structures, and also allow for the single-storey scale of the existing streetscape along Burton Road to remain, as shown in Figure 9 below.

Figure 9 - Proposed Streetscape Impression

The siting of the 2-storey apartment blocks towards the rear of the site will not have a negative impact on the southern adjoining properties, as they have been located generally 10m from the site's southern side boundary.

This proposed setback will allow for adequate visual screening to neighbouring properties (which are currently screened via the established tree-line along the common southern boundary and existing shed structure as can be seen in the above Figure 8), and reduce any impacts of overshadowing as shown below in Figures 10-12 for June 21st shadow diagrams. Note, tthe Dec 21st & Mar 21st shadow diagrams are not considered relevant, as the shadows cast at these times will only be shorter in length than those shown below for June 21st.

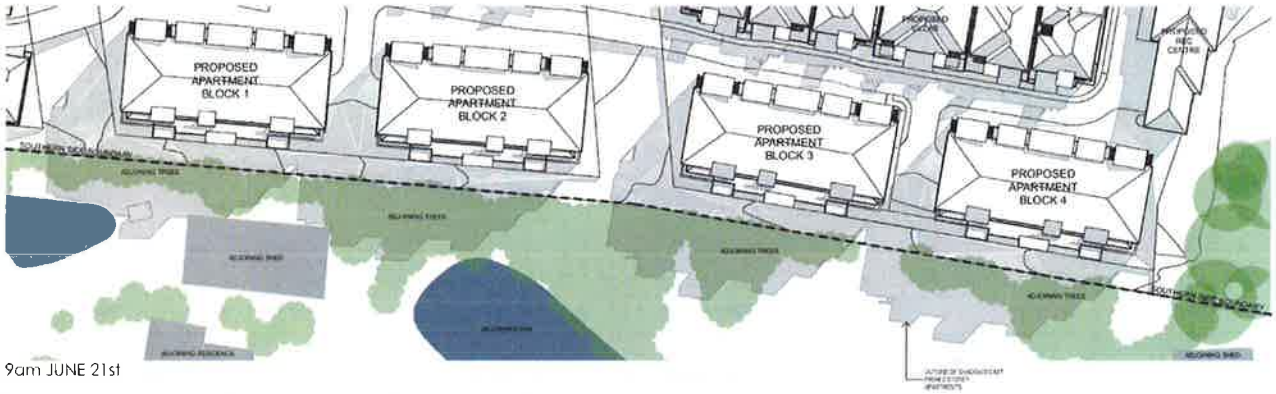

Figure 10 - Apartment Shadow Diagram (9am June 21st)

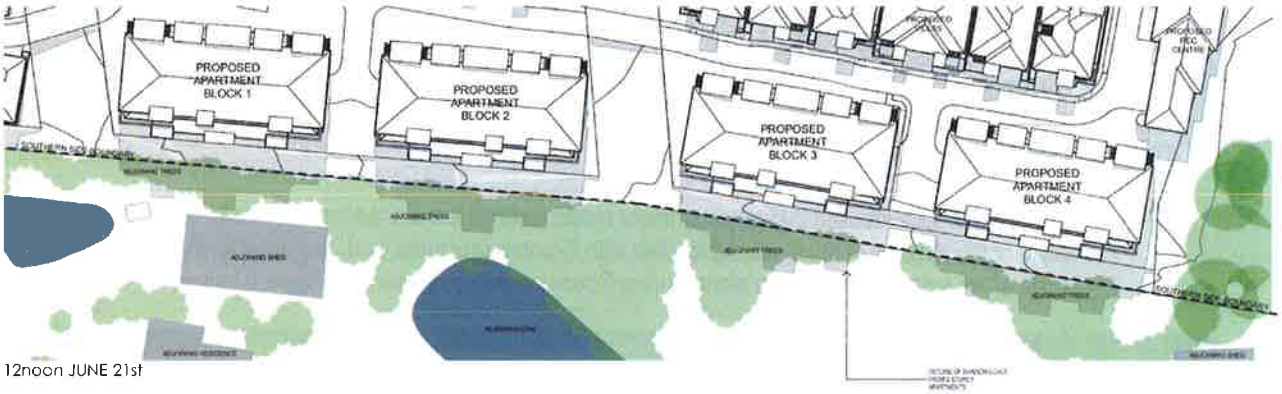

Figure 11 - Apartment Shadow Diagram (12noon June 21st)

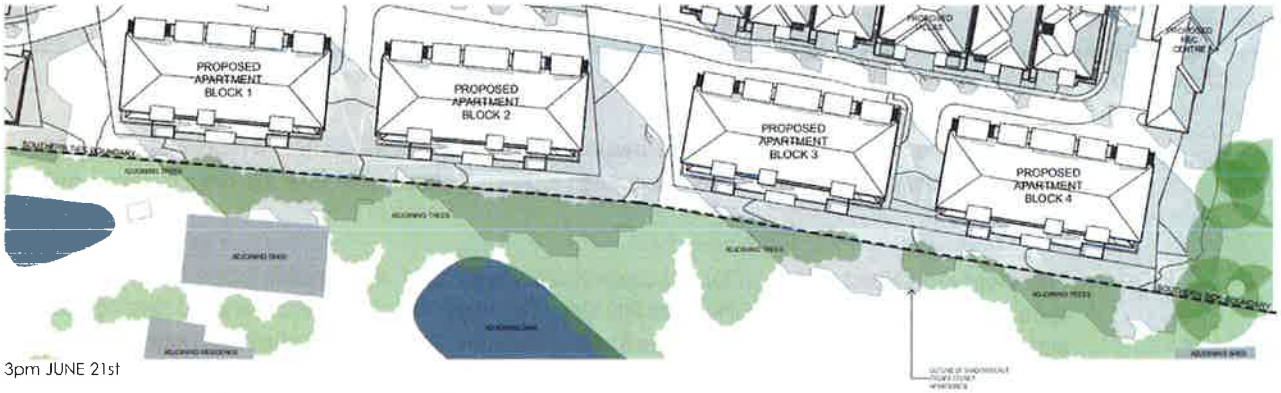

Figure 12 - Apartment Shadow Diagram (3pm June 21st)

Furthermore, once again, as outlined in LMCC's IP (Integrated Planning)-Strategic Planning Referral Response to the submitted DA, it is stated that *"with regard to the proposed unit (i.e. apartment) buildings" the Planner is "not concerned about the higher density form of the housing in the context"*, and that the planner also agrees that *"the larger buildings (i.e. typical apartment blocks) have been appropriately located within the site", with "some diversity of housing options within the development, which is something that Council is seeking to promote."*

Therefore, the proposed development has provided an appropriate scale of build and height that suits the scale of the street and the surrounding buildings.

3.0 BUILT FORM

PRINCIPLE (as taken from SEPP 65)

"Good design achieves an appropriate built form for a site and the building's purpose, in terms of building alignments, proportions, building type and the manipulation of building elements.

Appropriate built form defines the public domain, contributes to the character of streetscapes and parks, including their views and vistas, and provides internal amenity and outlook."

The proposed built form of the apartment blocks is a direct response to the surrounding context and scale (as previously mentioned in the above sections of this report), to develop an architectural solution that is sympathetic to, and contributes to, the character of the prevailing streetscape and current site conditions.

As previously mentioned, the prevailing single-storey built form of the streetscape has been maintained through the siting of the proposed 2-storey apartments towards the rear of the site, so that the apartment blocks aren't generally visible from Burton Road.

3.1 Massing & Overall Form

The planar massing of the apartment blocks, as previously mentioned, have been separated into 4 individual blocks to reduce the footprint sizes, but also to respond to the current site drainage conditions. The site is affected by, and subject to, an overland flow-path of PMF flood waters (1 in 10,000 year). The separation of the apartment blocks thereby also allows for appropriate landscaped drainage swales to cross the overall development site between the apartment blocks, as shown in Figure 13 below.

The separation of the apartment blocks in a planar massing context is also developed from the provision to enable basement level vehicular access points, shared between 2 opposing apartment blocks.

Figure 13 - Proposed Contextual Siting of Apartment Blocks

The vertical massing of the proposed apartment blocks is a simple response to the 'conventional' residential

2-storey character of the surrounding context. An elevated (i.e. similar to a bearer & joist floor system) 2-storey (i.e. 6m from ground floor level to upper ceiling level) vertical massing form grounds the built form.

A simple main roof-line in a 'hip-end' form covers the main vertical massing of the build form, to reflect to dominant surrounding residential typology, and to reflect the roof forms of the single-storey villas proposed within the development, generally as outlined in Figures 14 & 15 below.

Figure 14 - Typical Apartment Block North Elevation Massing & Overall Form

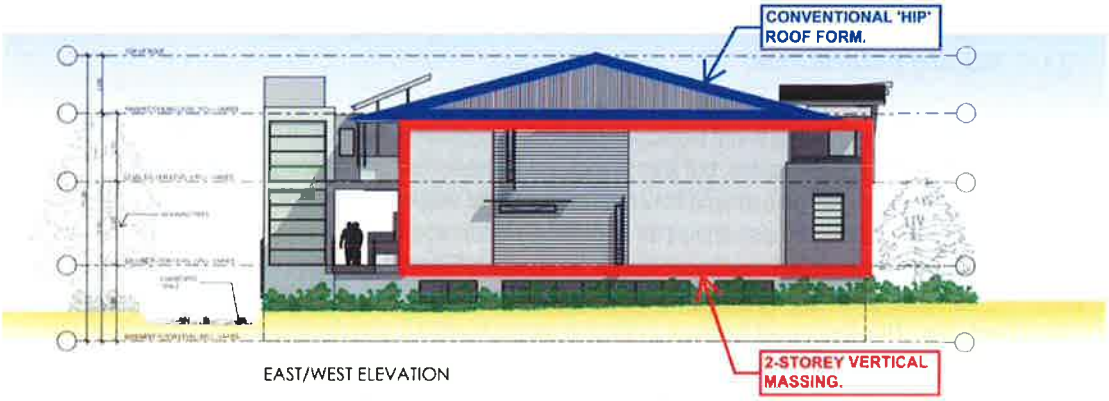

Figure 15 - Typical Apartment Block Side (East/West) Elevation Massing & Overall Form

3.2 Contextual Elements

The massing and overall form shown above, is then contextualised via sculptured recessed balconies and breezeways carved out of the main massing, generally as shown below in Figures 16 & 17.

Figure 16 - Typical Apartment Block North Elevation Contextual Elements

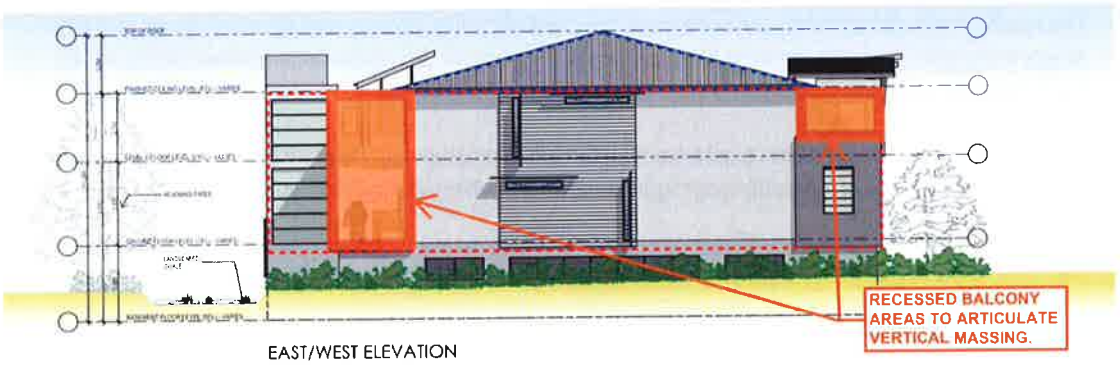

Figure 17 - Typical Apartment Block Side (East/West) Elevation Contextual Elements

3.3 Detail Elements

The contextualised overall form and massing shown above, is then articulated via detailed elements such as the facade panelisation proportioning (e.g. balcony edge treatments varying between each adjoining unit, and contrasting colour and material selections) , generally as shown in Figures 18 & 19 below.

Further refinement of the built form is achieved through the use of the detached 'fly-roof' forms that vary in pitch and size over the balcony and breezeway areas. These 'fly-roofs' also tie-in with style of the single-storey villas proposed within the development, to provide an overall unified 'village' sense. Varying balustrade treatments between adjoining units will further articulate the built form of the 2-storey apartments.

Figure 18 - Typical Apartment Block North Elevation Detail Elements

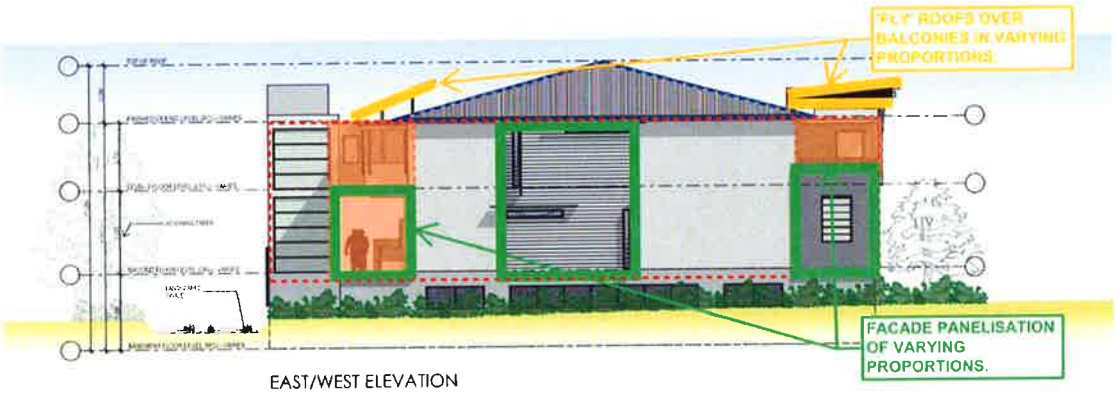

Figure 19 - Typical Apartment Block Side (East/West) Elevation Detail Elements

The resultant refined built form, with contextual and detail elements incorporated as noted above, is a very simple rectangular 2-storey structural form, concealed by a heavily articulated facade presentation, as can be clearly seen in Figure 20 below.

The proposed 2-storey apartment blocks are therefore an appropriate built form for the site's context and its proposed use, in terms of the building configurations, proportioning, the building type, and the manipulation of the building elements.

Figure 20 - Proposed Apartment Block Articulated Built Form

4.0 DENSITY

PRINCIPLE (as taken from SEPP 65)

"Good design has a density appropriate for a site and its context; in terms of floor space yields (or number of units or residents).

Appropriate densities are sustainable and consistent with the existing density in an area or, in precincts undergoing a transition, are consistent with the stated desired future density. Sustainable densities respond to the regional context, availability of infrastructure, public transport, community facilities and environmental quality."

4.1 Land Use

As previously mentioned in Part 1.1 (Land Use) of this report, the proposed development is located on land zoned 1(2)-Rural (Living) and a 7(5)-Environmental (Living) zone, with land to the north and east of the site comprising small semi-rural residential allotments, with large individual single or 2-storey dwellings on land zoned 1(2) and/or 7(5). A facility providing Tourist Accommodation/Function Centre/Restaurant and two rural living allotments adjoins to the south on 1(2) zoned land.

The subject site is however within 3m of 2(1)-Residential zoned land to the south, which comprises of 'densely' populated urban residential development, which spreads towards the south and west into Eleebana. Also, construction of a 'densely' populated 57 dwelling Retirement Village is currently progressing on land opposite the site, across Burton Road to the west, on land also zoned 1(2), as shown in Figure 21 below.

Figure 21 - Proposed Contextual Density

The proposed Retirement Village development of 101 dwellings, and the aforementioned development opposite the site, are consistent with a trend to develop these semi-rural parcels of land that are located centrally within the overall city and/or region, and that are also sandwiched between developed urban areas, which will undoubtedly in the future be developed into urban land uses.

As previously noted, in LMCC's IP-Strategic Planning Referral Response for the submitted DA, the development *"site is within a broader precinct that is likely to come under increasing pressure for rezoning for urban (rather than rural residential) purposes."*

The response also states that *"in April this year, IP prepared a paper entitled 'Availability of Land for Seniors Housing In Lake Macquarie' (ref. D02919659). Among other things, the paper explored the availability of sites adjacent to 'land zoned primarily for urban purposes' that were deemed suitable for seniors housing"*, where *"48 Burton Road was among approximately 100 sites that achieved a weighted score indicating it is well-suited to seniors housing. The paper also found that there were "relatively fewer opportunities for seniors housing in non-urban zones in the Charlestown and Belmont Districts".*

Furthermore, the IP 'response' also states *that "with regard to the proposed unit (i.e. apartment) buildings"* the Planner is *"not concerned about the higher density form of the housing in the context".*

4.2 Floor/Space Ratio

The proposed Floor/Space Ratio (FSR), which generally relates to the development's density, equates to a ratio of 0.27:1 (i.e. 27% of the total site area is occupied by built forms), for the overall development, including the proposed villas and apartments and Rec Centre.

Even if the 'unusable' site area occupied by the proposed 'undeveloped' 40m wide 'Exclusion Zone' setback from the existing creek at the rear of the site were not included in the overall total site area, the FSR still equates to 0.33:1 (i.e. 33% of the 'useable' site area is occupied by built forms).

The maximum allowed FSR permissible under the SEPP (Housing for Seniors or People with a Disability) – 2004 is 0.5:1, which therefore could potentially allow a further 23% of the total site area as built floor area or gross floor area (i.e. 23% of the total site area equates to approximately 11,400m2).

The proposed development of 101 dwellings, can therefore be considered to be only developed to half of its potential yield.

4.3 Landscaped & Deep Soil Areas

The proposed Landscaped Areas (LA), which also relates to the development's density, equates to 48.5% of the total site area, and 37.7% of the 'useable' site area as defined above. The minimum allowed LA permissible under the SEPP (HSPD) – 2004 is 30%. Therefore the proposal provides an additional 18.5% of the total site area as LA (i.e. approximately 9,700m2 additional landscaping).

Furthermore, the proposed Deep Soil Areas (DSA), which also relates to the development's density, equates to 41.3% of the total site area, and 29.0% of the 'useable' site area as defined above. The minimum allowed DSA permissible under the SEPP (HSPD) – 2004 is 15%. Therefore the proposal provides an additional 26.3% of the total site area as DSA (i.e. approximately 13,000m2 additional deep soil areas).

4.4 Services & Facilities

As previously mentioned in Part 1.2 (Context - Services & Facilities) of this report, the proposed development site can be considered as a desirable location for a Retirement Village project, as its context contains suitable sustainable services and facilities in close and accessible proximity (i.e. via the bus route and stops located at the front of the site).

Considering the above comments, the proposed development's density can therefore be considered more than appropriate for the subject site and its context.

5.0 RESOURCE, ENERGY & WATER EFFICIENCY

PRINCIPLE (as taken from SEPP 65)

"Good design makes efficient use of natural resources, energy and water throughout its full life cycle, including construction.

Sustainability is integral to the design process. Aspects include demolition of existing structures, recycling of materials, selection of appropriate and sustainable materials, adaptability and reuse of buildings, layouts and built form, passive solar design principles, efficient appliances and mechanical services, soil zones for vegetation and reuse of water."

5.1 Demolition of Existing Structures

The site is currently occupied by 2 separate single-storey dwellings and various associated outbuildings, generally as shown in Figure 22 below.

Figure 22 - Existing Site Plan

It is proposed to demolish all of the existing buildings on site, at various stages throughout the development process, to enable the erection of the proposed new Retirement Village.

5.2 Recycling of Materials

Materials demolished from the existing buildings on site, will be recycled or re-used where possible (i.e. existing concrete, bricks, tiles, and rubble recycled for building materials by the contractor or reused for filling and/or road-bases; and existing trees mulched and reused for landscaping purposes), or removed from site and deposited at approved waste management/recycling facilities.

5.3 Sustainable Material Selections

It is proposed to utilise sustainable materials where possible, and achieve required energy and thermal commitments as outlined in the associated BASIX report. However, the proposed buildings will generally be constructed from 'conventional' building materials typical for this 'residential' scale development (i.e. concrete 'waffle-pod' or suspended concrete floors; timber stud wall frames with render-finish 'EPS' foam cladding and render-finish 'AFS' permanent formwork concrete walls; and corrugated steel roof sheeting).

The proposed use of economically viable materials will therefore make the selection a sustainable one.

5.4 Adaptability & Reuse of Buildings

Due to the constraints of the site, adaptability of the dwellings is not generally considered to be a viable option. However, due to the 'terrace-row' style of the apartment blocks, it could be possible to adapt the apartments into larger 'double-size' units, where relatives could possibly provide 'live-in assisted care' for the elderly occupants, simply by providing access openings through the common 'party' walls between the adjoining apartment unit plans. This option would obviously be subject to a separate future application.

It is however proposed to 'reuse' the existing dwelling (no.48 Burton Rd), via minor renovations, as a temporary Rec Centre during Stage 1, until the new Rec Centre is completed in Stage 2, generally as shown in the Figure 23 below.

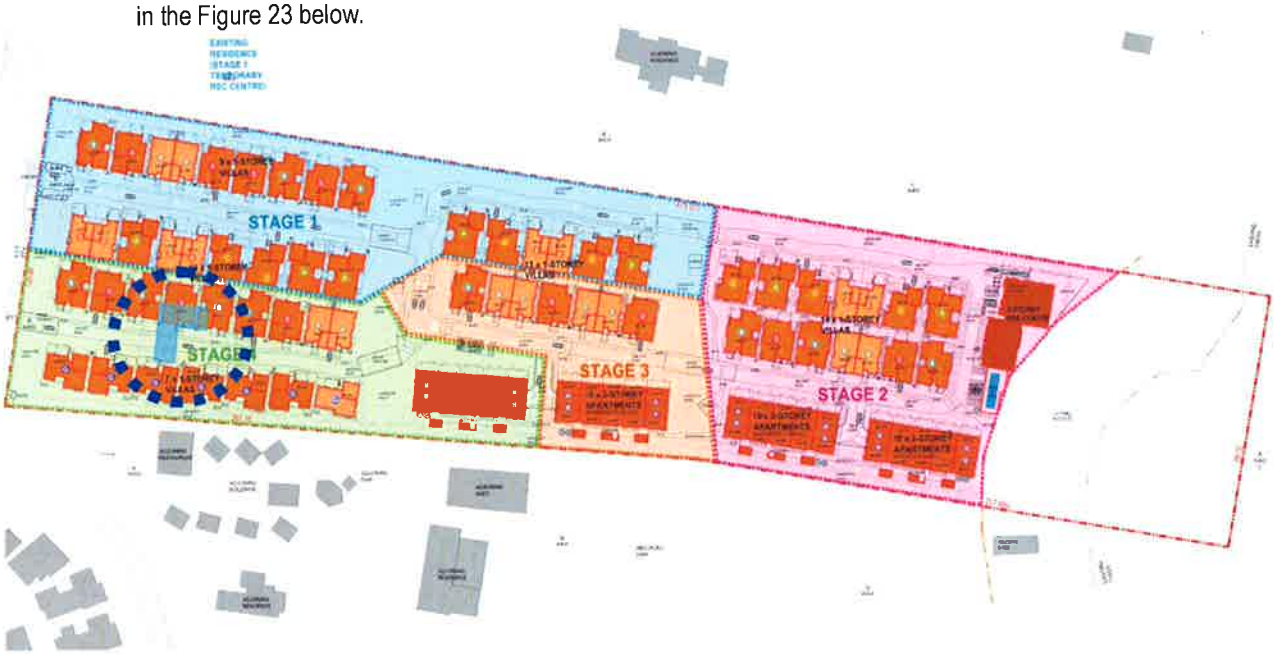

Figure 23 - Proposed Staging Plan

5.5 Layouts & Built Form

The 4 separate 'typical' apartment blocks has been purposefully designed to make most efficient use of energy and water consumption through the proposed layouts and built form proposed.

The 'terrace row' style apartment floor plan layouts proposed, on both the ground floor and first floor levels of the blocks, ensure that each apartment dwelling receives full northern aspects off their living areas (as can be seen in Figures 24 & 25 following), thereby reducing heating and cooling loads.

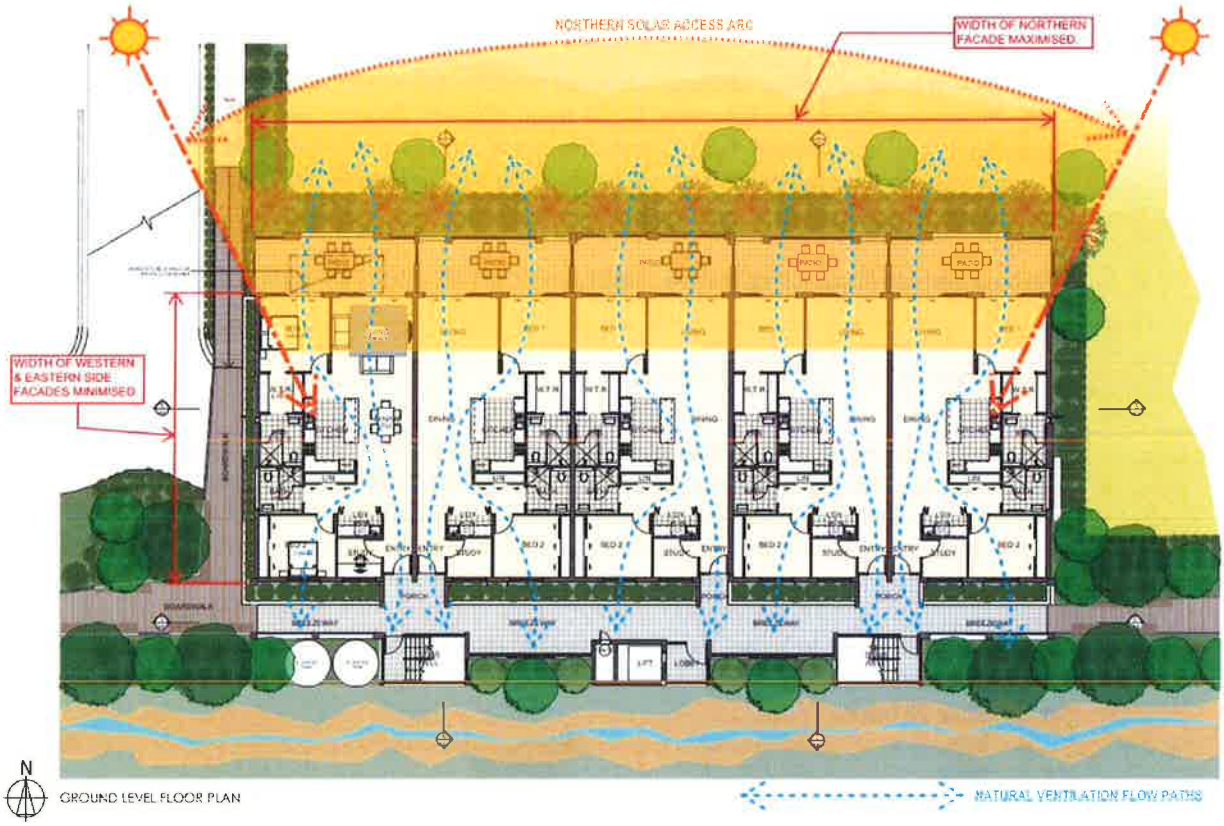

Figure 24 - Typical Apartment Block Ground Floor Plan

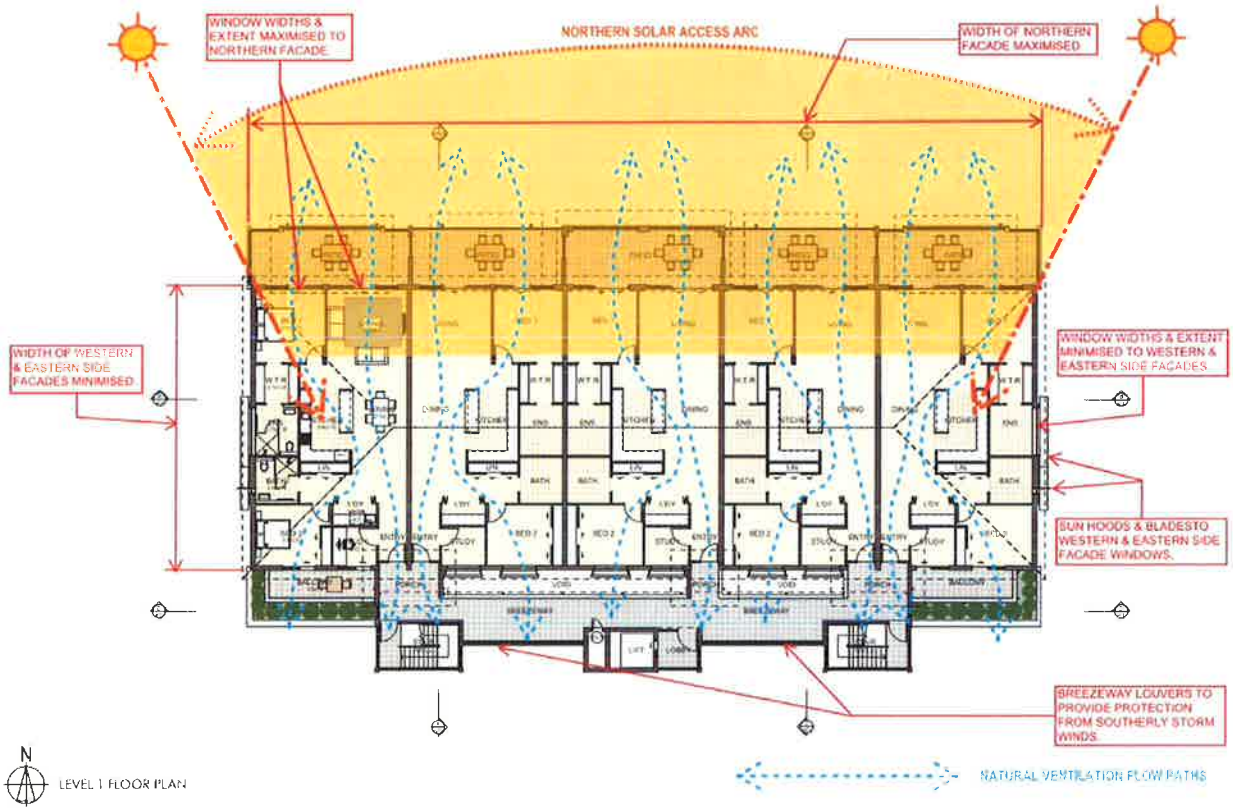

Figure 25 - Typical Apartment Block Level 1 Floor Plan

This is also supported by the open-plan 'cross-through' layout plan of each apartment, which allows for cross-ventilation from north to south throughout the unit. The southern facade of the apartments face a common 'semi-open' breezeway/passageway (i.e. louver glazing to the south of the passageway between the stair-wells & lift shafts, roofed, & open to the north via balustrade voids on the upper floor level), which is open at both the western and eastern ends of the breezeway, and also provides protection from strong southerly storm winds.

As also shown in Figure 24 above, each apartment block is provided with rainwater storage tanks, to collect roof water for reuse in the apartment toilets and laundries, as outlined in the BASIX report (see bottom left corner of layout for tank locations).

5.6 Passive Solar Design Principles

A key objective in the design process of the apartment blocks (as well as the villas throughout the overall development) was the incorporation of passive solar design principles.

As noted above, and as also shown in Figures 24 & 25 above, the northern orientation of each apartment's living space and adjoining outdoor area, was specifically designed to maximise the extent of solar access into these spaces. As a consequence of the 'terrace-row' style apartment floor plans, no unit is located on the southern side of the apartment blocks.

The extent of the solar penetration into the living and outdoor areas of the apartments, has been controlled via raised 'fly' roof structures on the upper floor level, so that the desirable winter sun penetration is maximised, whilst the undesirable summer sun infiltration is shielded. This principle is shown in the Section drawing of Figure 26 below. The summer-sun angle is shown in 'red' on the left of the drawing, where the angle of the 'fly' roofs shields any midday sun from entering the balconies, whilst the winter-sun angle is shown in 'orange', where the angle and raised height of the upper level 'fly' roofs allows for full solar access to the balconies and front portion of the living areas.

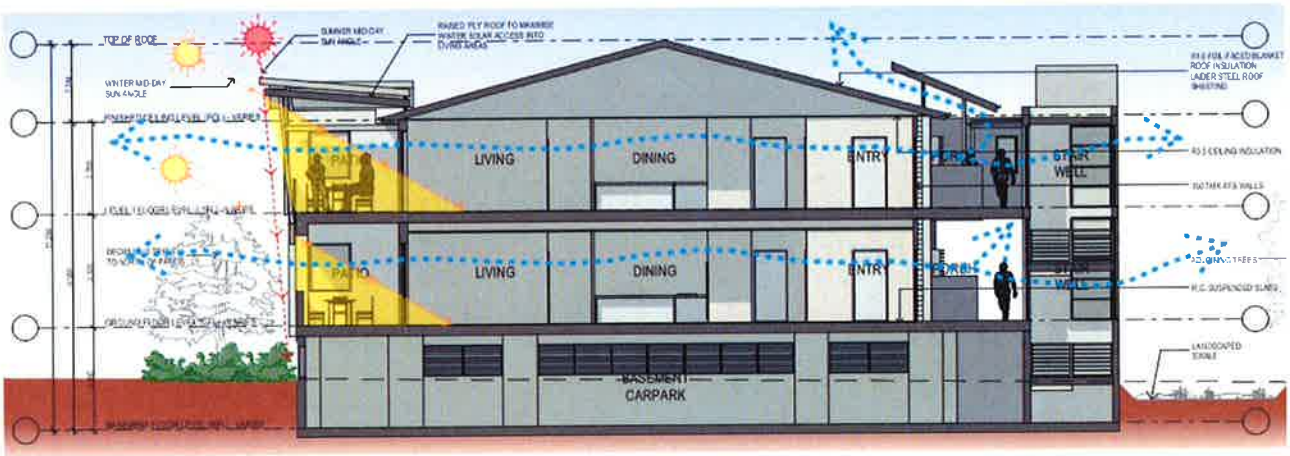

Figure 26 - Typical Apartment Block Cross-Section

Further passive solar design principles have also been adopted, such as minimising the extent of any western and eastern orientated glazing (the 'terrace-row' style floor plans shown in Figures 25 & 26 above assist this principle), which are shaded via sun hoods, as well as the use of deciduous tree planting adjoining the northern edge of the outdoor balcony areas.

5.7 Efficient Appliances & Mechanical Services

The use of efficient appliances and mechanical services is generally outlined in the submitted BASIX report, where the apartment blocks have generally utilised gas instantaneous hot water heater systems, gas cooktops, and fluorescent or LED light fittings throughout each unit.

The basement level carpark area is intended to be generally naturally ventilated, with mechanical assistance based on Co2 sensors.

5.8 Soil Zones for Vegetation

As previously noted (Part 4.3 of this report), the extent of deep soil zones proposed throughout the development equate to 41.3% of the total site area (i.e. approximately 20,500m2 of deep soil zones provided), which is a very substantial area for potential vegetation.

6.0 LANDSCAPE

PRINCIPLE (as taken from SEPP 65)

"Good design recognises that together landscape and buildings operate as an integrated and sustainable system, resulting in greater aesthetic quality and amenity for both occupants and the adjoining public domain.

Landscape design builds on the existing site's natural and cultural features in responsible and creative ways. It enhances the development's natural environmental performance by co-ordinating water and soil management, solar access, microclimate, tree canopy and habitat values. It contributes to the positive image and contextual fit of development through respect for streetscape and neighbourhood character, or desired future character."

Landscaping has been a key factor in the design process of the development. Substantial landscape 'fingers' have been incorporated to break-up the development into smaller areas, and double-up as the stormwater and flood control measures.

These 'fingers' have therefore provided the opportunity to create feature landscape drainages swales throughout the development, which will create a unique atmosphere for the village, that will also tie-in with the semi-rural feel of the site's context. Figures 27 & 28 below indicate this targeted atmosphere that is proposed.

Figure 27 - Feature Landscaped Drainage Swales

Figure 27 above shows the 'rural' style bridge crossings over the drainage swales that are proposed, as well as the proposed communal gazebo and raised deck structures that are scattered throughout the village pathway network. The proposed drainage swales will be lined with sandstone spallings and planted with

native grasses to create a natural creek-bed impression.

Figure 28 below also indicates the design objective to maximise the physical separation between the northern outdoor areas of the apartments and the opposing single-storey villas opposite.

Figure 28 - Internal Landscaped Street & Swale

Figure 29 below indicates the overall landscape layout surrounding the apartment blocks, as prepared by Terras Landscape Architects, with the drainage swales indicated by the 'blue' creek/water lines.

Figure 29 - Apartment Blocks Site Landscape Plan (source: Terras Landscape Architects)

Figure 29 above also shows how the depth landscaped area in front of the northern outdoor areas/balconies of the apartment blocks, to the adjacent roadway, has been maximised (particularly to the 2 western-most blocks), to increase the quality of the outlook from the apartments and maximise privacy, and to increase the public domain of the internal streetscape, which is also shown in Figure 30 following.

No significant native trees exist on the site where the apartment works are proposed, and as such no impact on the native vegetation is expected. A substantial established native tree-line is however present along the southern boundary of the site on the adjoining property (shown as a 'light-olive' colour in Figure 29 above), which will aid the development by providing a natural established privacy screen to the adjoining property.

Figure 30 below indicates the typical landscape layout surrounding a typical apartment block, as prepared by Terras Landscape Architects.

The principle of the typical apartment block landscape design is to provide a landscaped outlook from the northern orientated balconies and living areas of the units. Another landscape principle is to provide deciduous tree planting to the northern edge of the balconies, to assist in passive solar design objectives.

Figure 30 - Typical Apartment Block Landscape Plan (source: Terras Landscape Architects)

The common passageway/breezeway that runs for the full length along the southern facade of the 4 apartment blocks, is designed to provide an 'open' feel, with an outlook over the adjoining landscaped drainage swale and the existing adjoining native tree-line.

Considering the above comments, the submitted proposal thereby provides a seamless landscape and built environment that operates as an integrated and sustainable system. The overall effect is a visually pleasant aesthetic quality and amenity for both the occupants and visitors, and the adjoining neighbours.

7.0 AMENITY

PRINCIPLE (as taken from SEPP 65)

"Good design provides amenity through the physical, spatial and environmental quality of a development.

Optimising amenity requires appropriate room dimensions and shapes, access to sunlight, natural ventilation, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas, outlook and ease of access for all age groups and degrees of mobility."

7.1 Room Dimensions & Shape

The plan layout of the apartments is typical for all of the 40 proposed apartment dwellings, where room dimensions and shape have been developed with 'accessibility' in mind. The shape and dimensions of the rooms are generally shown in Figure 31 following, where an 'open-plan' living/dining/kitchen/entry space has been proposed to assist in the flexibility of furniture placements, as well as cross-ventilation benefits.

7.2 Access to Sunlight

As previously mentioned, passive solar design principles have been at the forefront of the design process for the apartment blocks. The living and outdoor areas have been sited to the north of the floor plan layouts to maximise the extent of potential solar access, as shown in Figure 31 following.

Furthermore, also as previously discussed, the roof structures over the external balcony areas have been designed to maximise the degree of possible solar access, via the raised roof levels and pitch angle of the 'fly' roofs, as shown in Figure 32 following.

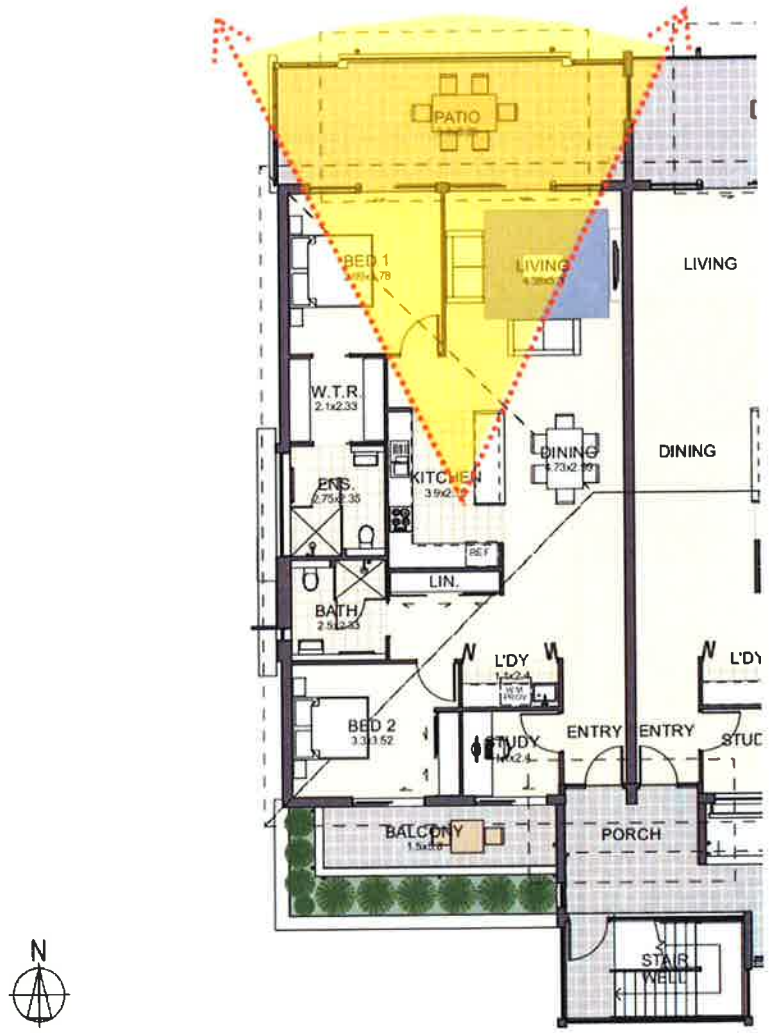

Figure 31 - Typical Apartment Floor Plan (Solar Access)

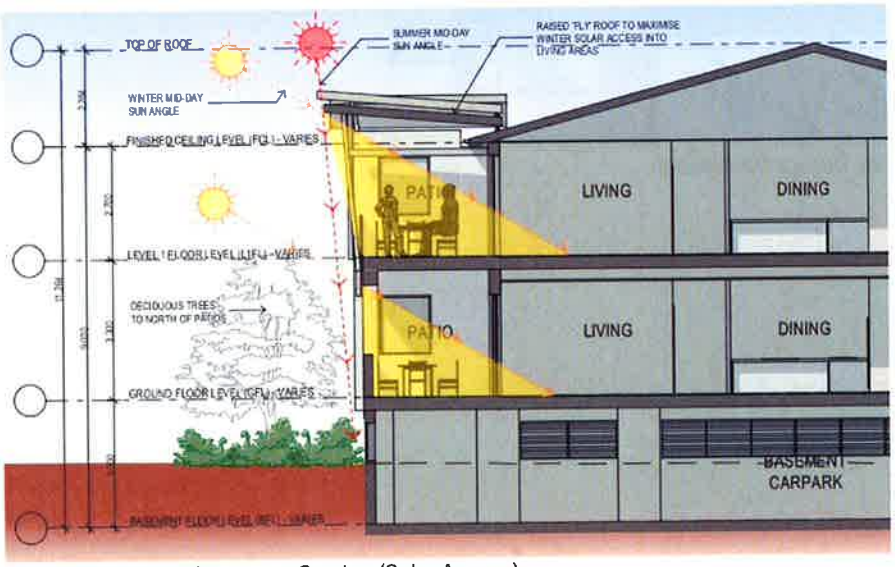

Figure 32 - Typical Apartment Section (Solar Access)

7.3 Natural Ventilation

Again as previously mentioned, 'good' design principles have been at the forefront of the design process for the apartment blocks. The 'terrace-row' style of floor plan, with full 'cross-through' layout of the living areas, allows for optimal cross-ventilation of each apartment, as shown in Figures 33 & 34 following.

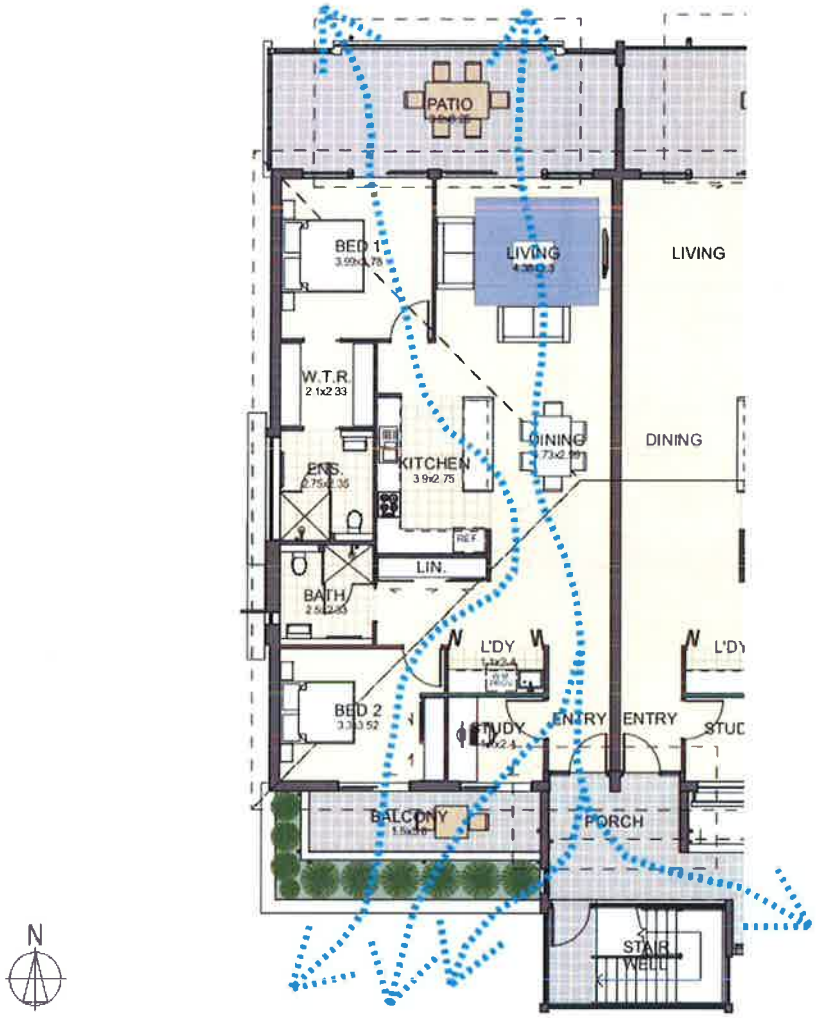

Figure 33 - Typical Apartment Section (Natural Ventilation)

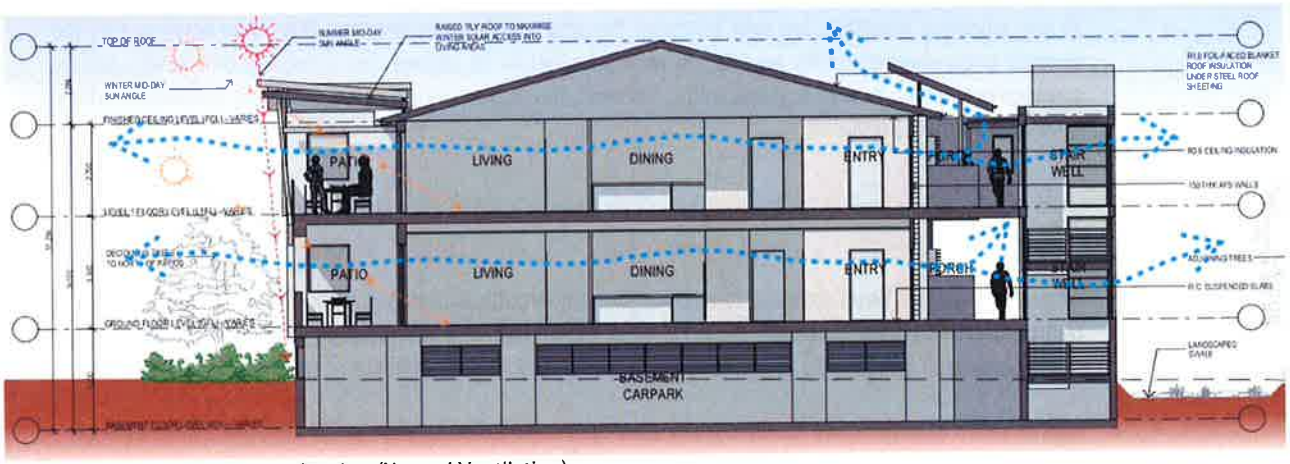

Figure 34 - Typical Apartment Section (Natural Ventilation)

7.4 Visual & Acoustic Privacy

Again, due to the 'terrace-row' style of floor plan adopted for all of the apartments, visual and acoustic privacy is maximised, as no apartments directly face each other. The common dividing walls between adjoining units, both internally and externally on the balconies, provides an ideal separation between opposing dwellings. The mirroring of alike room functions down these dividing walls further assists in maximising acoustic privacy between units. The common dividing wall will be constructed in accordance with the BCA and Australian Standard requirements.

Visual privacy to the north side of the apartment blocks, which faces to proposed single-storey villas of the development, has been achieved by maximising the distance between the 2 built forms, with roadway and landscaped areas between, generally as shown in Figure 35 below.

Figure 35 - Apartment Blocks Siting

Privacy to the south of the apartment blocks (i.e. to the adjoining properties) is not considered to be an issue, as the established tree-line along the boundary line provides an ideal buffer screen, and the location

of any adjoining dwellings are well any from the apartment blocks (approx. 50m) and screened by the existing large shed structure as well, as shown in Figure 35 above. The screened breezeway access passageway also provides a visual buffer between the apartments and the adjoining properties, where opaque glazing is proposed.

7.5 Storage

Ample storage has been provided to each apartment through built-in and walk-through robes in each bedroom, a large linen cupboard (i.e. 2.7m wide x 2.4m high), as well as large lockable caged-in storage areas (approx. 1.9m x 4.2m) within the basement carpark area as shown in Figure 36 following.

Maintenance storage areas for the overall development are also located in the basement floor level of the apartment blocks as well.

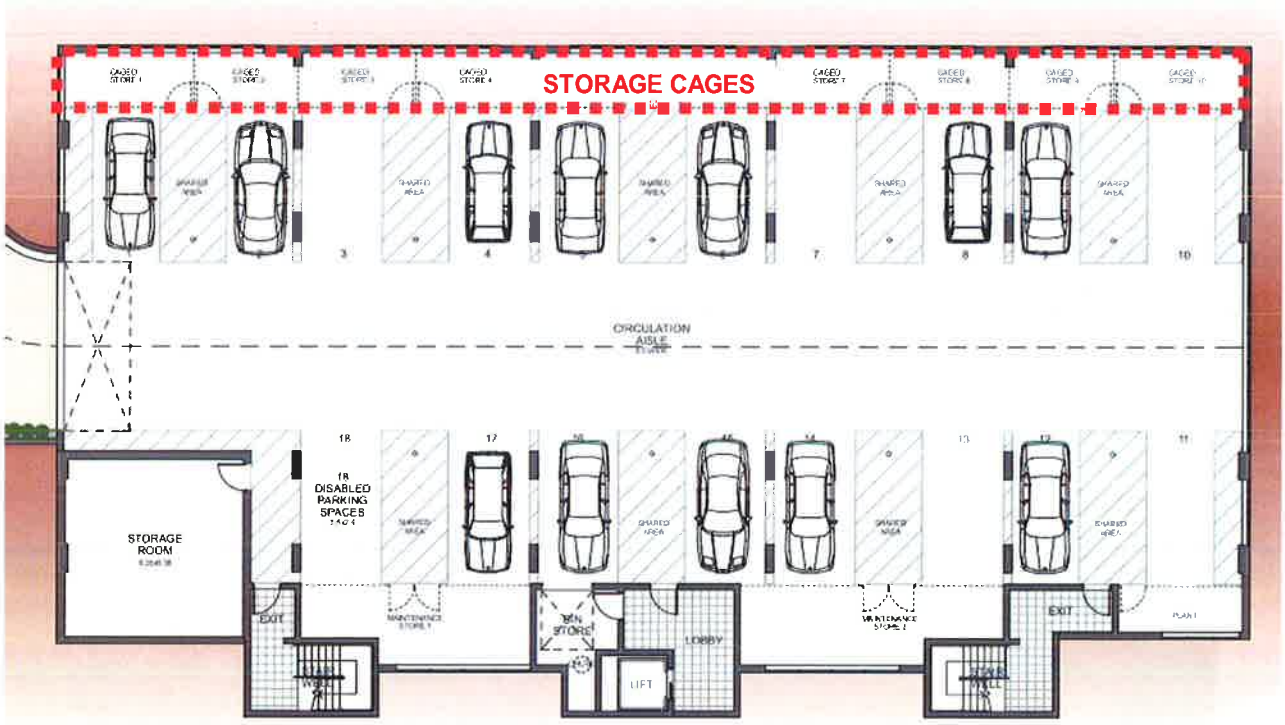

Figure 36 - Typical Apartment Block Basement Level Floor Plan

7.6 Indoor & Outdoor Space

Another key design aim for the development was to provide a direct link between well-lit, functional, and practical indoor and outdoor living areas. The proposed plan layout successfully achieves this aim.

7.7 Efficient Layouts & Service Areas

The efficiency of the layouts is maximised through the 'terrace-row' style of layout, which is repeated throughout all of the apartment blocks.

Locating the car parking facilities in the basement floor level allows for the efficiency of the apartment

plans to be maximised as well.

Services areas are also located in the basement floor level to maximise efficiency in the layout. A Garbage Bin Store is located on this floor level adjacent the lift shaft (as shown on Figure 36 above). Garbage disposal from the individual apartments to this Store is accessed via the garbage chute, located again adjacent the lift shaft on both the ground and upper floor levels over, directly over the basement level Bin Store.

7.8 Outlook

As previously mentioned, the outlook from the living areas (both indoor and outdoor) is to a substantial common landscaped area, to provide a pleasant view for the occupants, generally as shown in Figure 37 following.

Figure 37 - Typical Apartment Block Outlook

7.9 Access & Mobility

The plan layout of the apartments is typical for all of the 40 proposed apartment dwellings, where room dimensions and shape have been developed with 'accessibility' in mind. The apartments are subject to the requirements of SEPP (Housing for Seniors or People with a Disability) – 2004, and therefore minimum spatial requirements are required to be achieved. The proposed apartment layouts achieve these standards, as endorsed by the submitted Access report prepared by Lindsay Perry, which was submitted as part of the DA.

8.0 SAFETY & SECURITY

PRINCIPLE (as taken from SEPP 65)

"Good design optimises safety and security, both internal to the development and for the public domain.

This is achieved by maximising overlooking of public and communal spaces while maintaining internal privacy, avoiding dark and non-visible areas, maximising activity on streets, providing clear, safe access points, providing quality public spaces that cater for desired recreational uses, providing lighting appropriate to the location and desired activities, and clear definition between public and private spaces."

Careful design has pursued to ensure safety and security measures are met for the development.

All of the apartments have been designed to face the common roadway, to create a sense of activity at the street edge. A sense of surveillance is offered through this design method and will make people feel safe at this particular area, as the inhabitants themselves become key agents in ensuing security.

Secure, clearly visible, and well lit entry points into each apartment are provided at different locations along the common breeze/passageway, to allow for multiple access points which are able to be surveyed along the full length of this passage to increase security..

The proposed Retirement Village will also provide on-site support services and a full-time Caretaker, which will also increase the sense of safety and security.

Also, to further improve the security and safety of residents, an emergency communication system will be installed in each dwelling, and in common areas throughout the building, for the use of residents. This Emergency Alarm system will provide residents with the mechanism to summon an urgent response to an Emergency situation.

Furthermore, the Crime Prevention Report submitted with the DA, as prepared by Coastplan Group P/L, outlines that *the "locality is identified as having a moderate site area rating for crime risk"*, and that *"the proposed retirement village is not at significant risk"*, and that *"the design incorporates features which limit potential opportunistic crime. Some recommendations have been made which can be simply incorporated into the proposal as follows:*

- *Provision of lighting to the access roads and pathways.*
- *Consideration of CCTV and alarm systems for the stairwells/lifts of the unit entries.*
- *Provision of fencing around the site boundaries.*
- *Apartment doors should be fitted with security screened doors will locking mechanisms.*
- *Unit doors should be fitted with deadbolts.*
- *Unit entries, lifts and fire ground floor fire stair doors should be provided with quality locking mechanisms and/or remote accessed locking mechanisms to prevent unauthorised entry."*

9.0 SOCIAL DIMENSIONS

PRINCIPLE (as taken from SEPP 65)

"Good design responds to the social context and needs of the local community in terms of lifestyles, affordability, and access to social facilities.

New developments should optimise the provision of housing to suit the social mix and needs in the neighbourhood or, in the case of precincts undergoing transition, provide for the desired future community."

As previously mentioned, as outlined in LMCC's IP-Strategic Planning Referral Response for the subject DA, *"the current non-urban zoning makes seniors housing an attractive development option for the land from an economic perspective."* It also mentions that *"some diversity of housing options within the development, which is something that Council is seeking to promote."*

Again, the Strategic Planner's response also states that *"in April this year, IP prepared a paper entitled 'Availability of Land for Seniors Housing In Lake Macquarie' (ref. D02919659). Among other things, the paper explored the availability of sites adjacent to 'land zoned primarily for urban purposes' that were deemed suitable for seniors housing"*, where *"48 Burton Road was among approximately 100 sites that achieved a weighted score indicating it is well-suited to seniors housing. The paper also found that there were "relatively fewer opportunities for seniors housing in non-urban zones in the Charlestown and Belmont Districts".*

Also, in the 'Analysis of Demand for Seniors Living Retirement Housing' report submitted with the DA, as prepared by Stan Manning & Associates dated November 2013, the *"report highlights the need for the availability of additional specific retirement living housing in the Lake Macquarie East Statistical Local Area (SLA). It shows that there is a substantial shortfall in this type of housing and facility within the area".*

The above mentioned report also states that research into *"of all of the existing Retirement Villages in the East SLA found that the majority of the existing Retirement Village housing is more than 17 – 40 years old, with only two new developments providing 102 dwellings, being provided in the last 10 years in this area. During the same period the number of persons over the age of 65 years has increased by an estimated 2,757 persons."*

Therefore, *"it has been calculated that in that 10 year period there was a shortage of approximately 183 to 275 new retirement village housing dwellings provided. This has meant there was only a limited amount of new product available to those seeking a modern newly constructed Retirement Village dwelling."*

Furthermore, *"the development proposed would address this present shortage of serviced retirement village housing by providing an additional 101 dwellings, in a modern development, which potentially could house more than 155 local residents."*

The study by Stan Manning *"also shows that there will be an ongoing demand for a substantial increase in the number of retirement village dwellings in this sub region (and the LGA generally), because of the continuing increase in the number of persons over the age of 65 years from now and at least up till 2036 and most likely well beyond that time."*

Therefore, considering the above comments, the Retirement Village proposal is considered to be the most appropriate form of development for the site and its surrounding neighbourhoods.

10.0 AESTHETICS

PRINCIPLE (as taken from SEPP 65)

"Quality aesthetics require the appropriate composition of building elements, textures, materials and colours and reflect the use, internal design and structure of the development. Aesthetics should respond to the environment and context, particularly to desirable elements of the existing streetscape or, in precincts undergoing transition, contribute to the desired future character of the area."

The aesthetic language of the architectural proposal is an attempt to reflect the 'semi-rural' and residential typology that dominates the surrounding neighbourhood context, with a modern touch, and is a key objective in the design solution. The use of conventional residential hip-roof forms, corrugated steel roofing, stacked stone feature walls, stained timber post and rail fences and bridge railings, and extensive native planting, are all facets where this design objective has been resolved, as evident in Figures 38 & 39 below.

Figure 38 - Proposed 'Rural' Material Aesthetics

Figure 39 – Proposed Development Street Entry Material Palette

The proposed streetscape presentation aims to act as a continuation of the prevailing typical single-storey scale along Burton Road by locating all of the proposed single-storey villas to the front portion of the development site. The wide landscaped setback distance provided to the proposed villas from Burton Road will also act as a continuation of the vegetation strips along this road, which can be seen in Figure 40 below.

Figure 40 - Proposed Streetscape Presentation

The apartment buildings have been designed to act as an extension to the architectural language of the proposed single-storey villas, to form an overall Retirement Village development feel. Similar roof forms (e.g. hip main roofs, and 'fly' feature roofs over outdoor areas), colours, and material palettes between both the villas and the apartments aid this intention to provide an overall community experience, which is visible in Figure 41 below.

Figure 41 - Proposed Village Atmosphere

The proposal has been designed to not only provide for a high level of design quality itself, but also aims to lift the level of design and building quality within the surrounding area generally, and encourage other property owners to provide innovative, 'best practice' solutions elsewhere within the area.

The proposal provides a clear, concise language to all its elevations with a variety of materials and textures including, concrete, stone, glass, steel and painted surfaces. The building aims via the utilisation of the material palette above to create interest and appropriate articulation to its elevations in both innovative and elegant ways.

The proposal has aimed to 'lift the bar' in terms of aesthetics and building performance in the area, which the design team has worked to achieve via this proposal.

The developments composition of elements, textures, materials and built form adequately reflects the building's use, internal design and structure of the proposal.

The proposed apartment buildings therefore adequately respond to its context, and reinforce the precinct's character.

11.0 SEPP 65 DESIGN VERIFICATION STATEMENT

January 2014

Re: LMCC DA / 1892 / 2013

ELEEBANA SHORES RETIREMENT VILLAGE
40 & 48 BURTON ROAD
MOUNT HUTTON NSW 2290

Description of the Development:

The application is for a Retirement Village consisting of 101 dwellings, made up of 61 detached or semi-detached single-storey villas, and 40 apartment units (within 4 separate 2-storey building blocks with basement level parking under), and an on-site Recreation Centre.

The proposed apartment blocks generally don't meet the definition of a 'residential flat building' as outlined in SEPP 65, as the proposed buildings are by and large only 2-storey in height, with the basement parking level generally not protruding more than 1.2m above ground level.

This report therefore provides supplementary information in association with the documentation already lodged for DA/1892/2013, as requested by LMCC.

The primary focus of this report is therefore in relation to the proposed apartment blocks, rather than the single-storey villas, which are not subject to the requirements of SEPP 65.

I, John Streeter, state that I have designed the above development and verify that the proposed development achieves the design quality principles as set out in Part 2 of the State Environmental Policy No. 65 – Design Quality of Residential Flat Development.

Signed: .....
Registered Architect, Reg No. 6964

12.0 APPENDIX A – SURROUNDING SITES WITH 2-STOREY BUILDINGS

Refer to the following pages for images of the 2-storey buildings that surround the subject development site, as highlighted in the Figure 22 below.

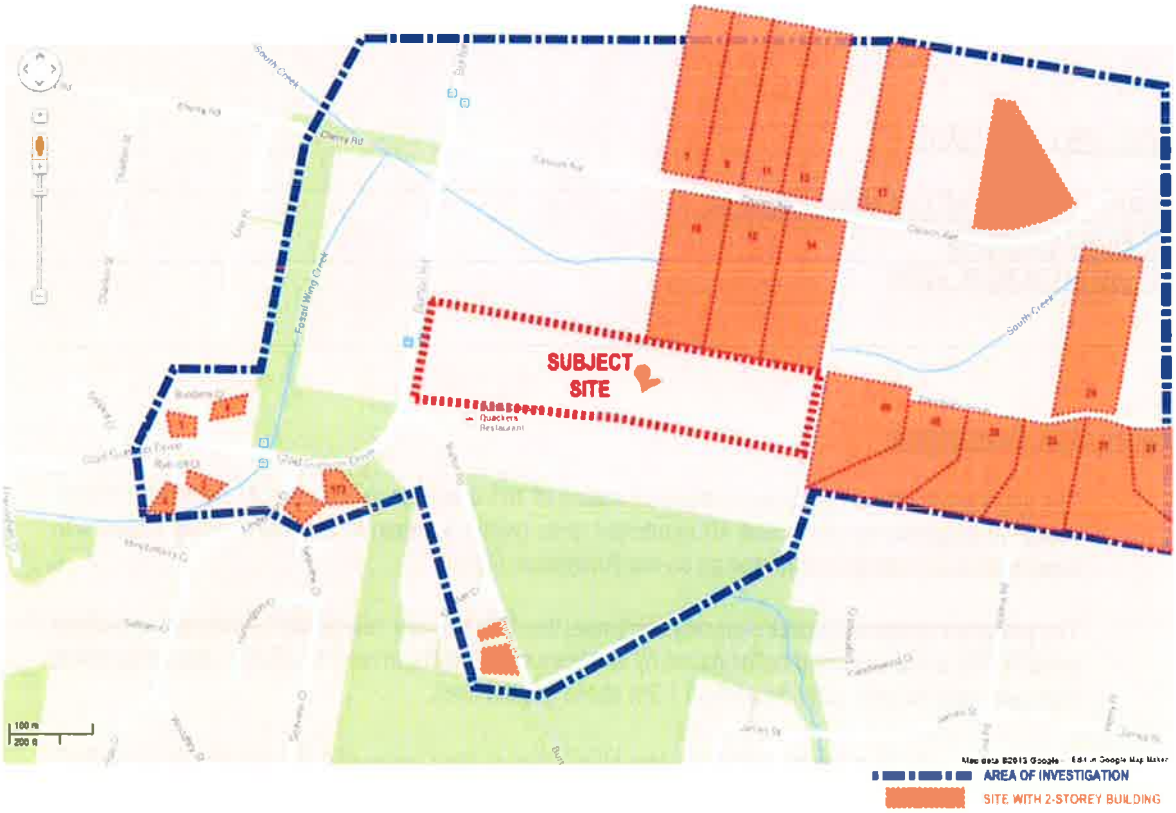

Figure 42 - Surrounding Sites with 2-Storey Buildings (source: Google Maps 2013)

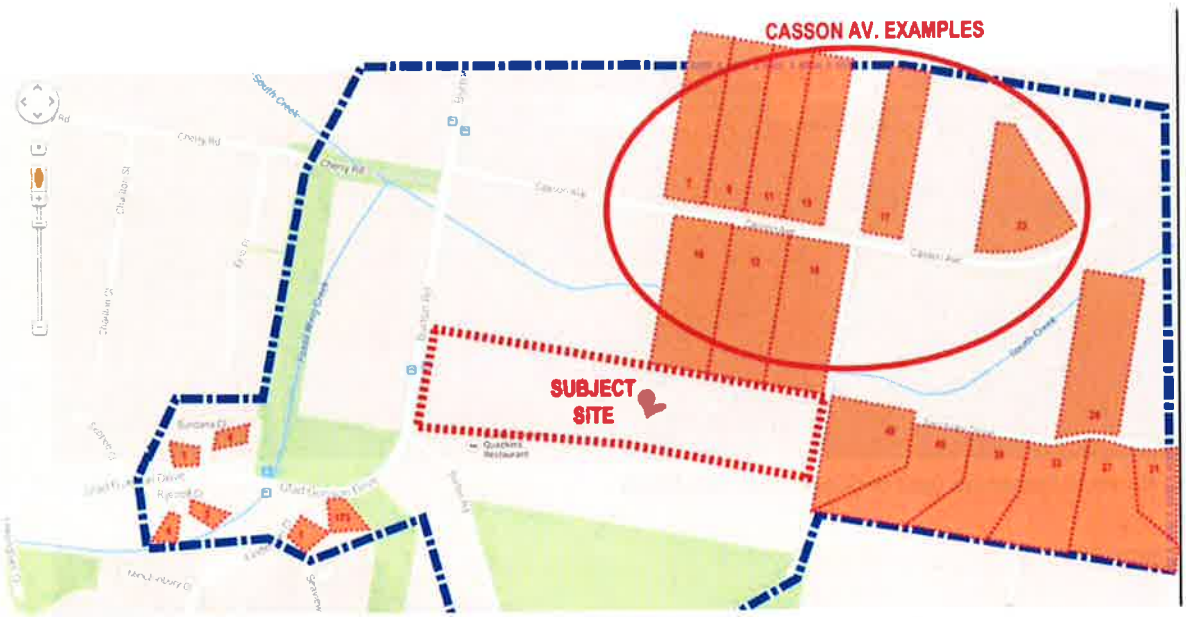

Figure 43 - Surrounding Casson Av. Sites with 2-Storey Buildings (source: Google Maps 2013)

Figure 44 - no.7 Casson Av. (source Google Maps Streetview)

Figure 45 - no.9 Casson Av. (source Google Maps Streetview)

Figure 46 - no.10 Casson Av. (source Google Maps Streetview)

Figure 47 - no.11 Casson Av. (source Google Maps Streetview)

Figure 48 - no.12 Casson Av. (source Google Maps Streetview)

Figure 49 - no.13 Casson Av. (source Google Maps Streetview)

Figure 50 - no.14 Casson Av. (source Google Maps Streetview)

Figure 51 - no.17 Casson Av. (source Google Maps Streetview)

Figure 52 - no.23 Casson Av. (source Google Maps Streetview)

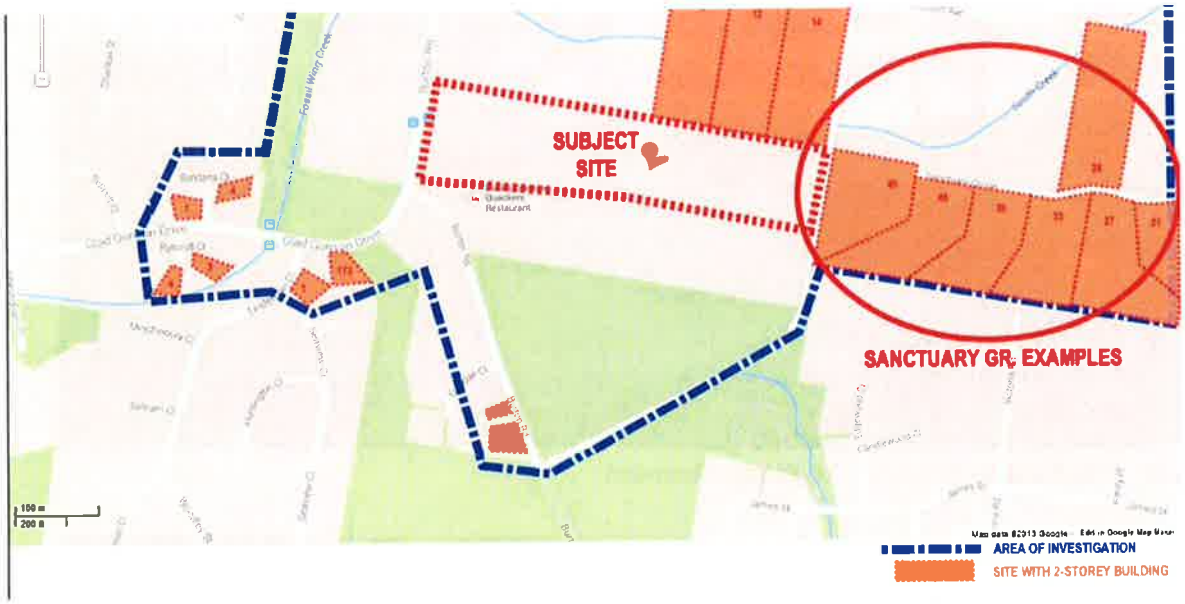

Figure 53 - Surrounding Sanctuary Gr. Sites with 2-Storey Buildings (source: Google Maps 2013)

Figure 54 - no.21 Sanctuary Gr. (source Google Maps Streetview)

Figure 55 - no.27 Sanctuary Gr. (source Google Maps Streetview)

Figure 56 - no.28 Sanctuary Gr. (source Google Maps Streetview)

Figure 57 - no.33 Sanctuary Gr. (source Google Maps Streetview)

Figure 58 - no.33 Sanctuary Gr. (source Google Maps Streetview)

Figure 59 - no.45 Sanctuary Gr. (source Google Maps Streetview)

Figure 60 - no.49 Sanctuary Gr. (source Google Maps Streetview)

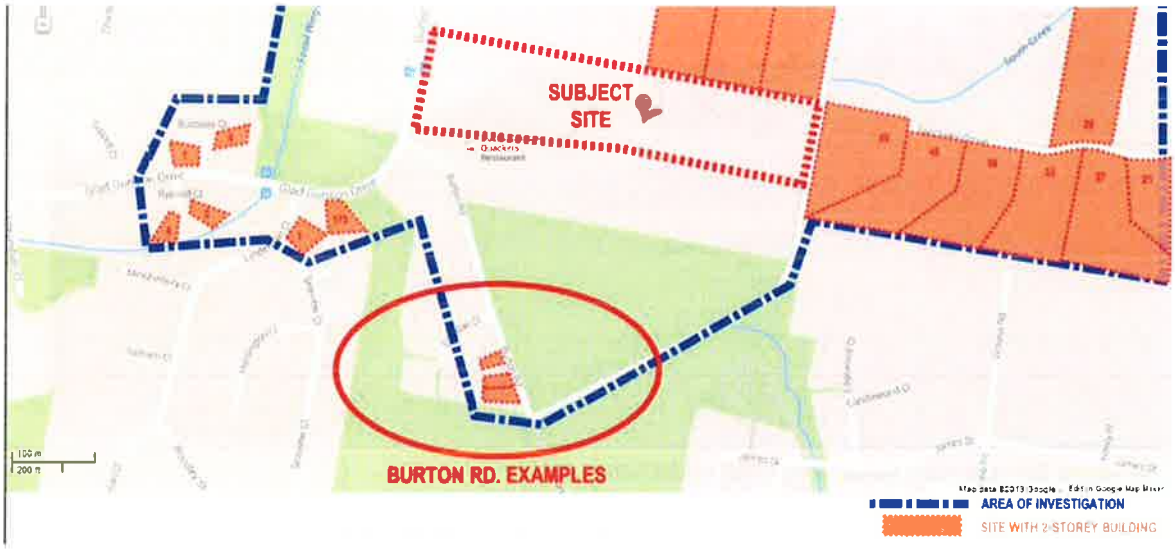

Figure 61 - Surrounding Burton Rd. Sites with 2-Storey Buildings (source: Google Maps 2013)

Figure 62 - no.93 Burton Rd (source Google Maps Streetview)

Figure 63 - no.97 Burton Rd (source Google Maps Streetview)

Figure 64 - no.99 Burton Rd (source Google Maps Streetview)

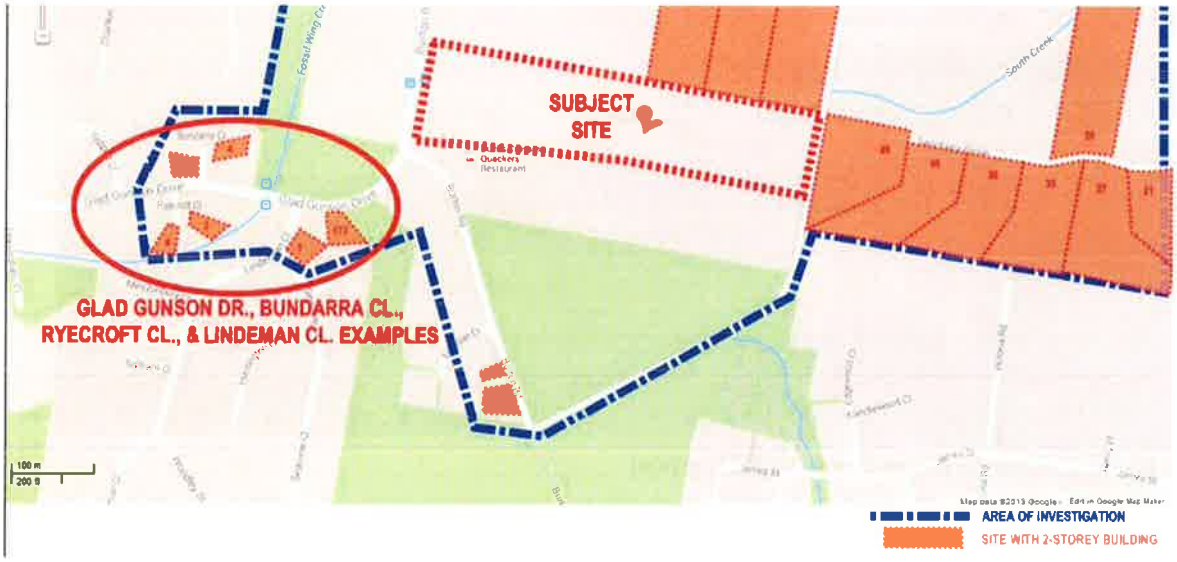

Figure 65 - Surrounding Glad Gunson Dr., Bundarra Cl., Ryecroft Cl., & Lindeman Cl. Sites with 2-Storey Buildings (source: Google Maps 2013)

Figure 66 - no.173 Glad Gunson Dr. (source Google Maps Streetview)

Figure 67 - no.1 Bundarra Cl. (source Google Maps Streetview)

Figure 68 - no.4 Bundarra Cl. (source Google Maps Streetview)

Figure 69 - no.2 Lindeman Cl. (source Google Maps Streetview)

Figure 70 - no.3 Ryecroft Cl. (source Google Maps Streetview)

Figure 71 - no.4 Ryecroft Cl. (source Google Maps Streetview)

13.0 APPENDIX B – LMCC STRATEGIC PLANNER'S REFERRAL RESPONSE

Referral Response
IP – Strategic Planning

Lake Macquarie City Council

Application Number:	DA/1892/2013	**Date:**	20 January 2013
Location:	LOT 12 DP 830292, LOT 11 DP 830292 48 BURTON ROAD, MOUNT HUTTON NSW 2290, 40 BURTON ROAD, MOUNT HUTTON NSW 2290		

Thank you for referring the above application to Integrated Planning (IP).

The application is for a retirement village consisting of 101 dwellings, made up of 61 detached or semi-detached villas and 40 units (within 4 separate two storey buildings), and an on-site recreation centre.

The proposed development is located predominantly within the 1(2) Rural (Living) zone and partly within the 7(5) Environmental (Living) zone. It is difficult to support that the proposed development is consistent with some of the objectives of these land use zones. However, Clause 41 of Lake Macquarie Local Environmental Plan 2004 (LMLEP 2004) provides that a retirement village may be permitted, with consent, in certain zones (including Zones 1(2) and 7(5)) if the land immediately adjoins, or is within 400 metres of, land within Zone 2(1).

I note that the applicant has lodged the application in accordance with the SEPP (Housing for Seniors or People with a Disability) 2004, which overrides the controls in LMLEP 2004.

From a strategic land-use perspective, it is apparent that the subject site is within a broader precinct that is likely to come under increasing pressure for rezoning for urban (rather than rural residential) purposes. In this regard, Integrated Planning have identified the need to undertake a study of current land use patterns in the area. It is anticipated the study will be undertaken in the next 2-3 years and will seek community comments on appropriate land uses. The results of the study would be used to develop a land-use strategy for the "South Creek Catchment".

IP is aware, however, that the current non-urban zoning makes seniors housing an attractive development option for the land from an economic perspective.

In April this year, IP prepared a paper entitled "Availability of Land for Seniors Housing In Lake Macquarie" (ref. D02919659). Among other things, the paper explored the availability of sites adjacent to 'land zoned primarily for urban purposes' that were deemed suitable for seniors housing. Sites of at least 2 hectares were assessed against a range of criteria, including proximity to town centre services, availability of public transport, and site constraints such as slope, prevalence of vegetation and flood risk.

48 Burton Road was among approximately 100 sites that achieved a weighted score indicating it is well-suited to seniors housing. The paper also found that there were "relatively fewer opportunities for seniors housing in non-urban zones in the Charlestown and Belmont Districts".

For these reasons, Integrated Planning, does not object to the proposed development proceeding prior to future planning for the area. There are no controls in Draft LMLEP 2013 equivalent to the current Clause 41, and the restrictions of the SEPP in relation to land adjoining land zoned primarily for urban purposes mean there are only limited opportunities for additional seniors housing development in the Burton Road / South Creek precinct. Approval of the subject application would not lead to development 'creep' without rezoning of adjacent land (which would

require community consultation – in addition to consultation undertaken as part of the aforementioned land-use strategy).

With regard to the proposed unit buildings, I am not concerned about the higher density form of housing in the context. I agree the larger buildings have been appropriately located within the site. The unit buildings provide for some diversity of housing options within the development, which is something that Council is seeking to promote.

I consider that any impacts on the rural residential character of the land should be weighed against the benefits the proposed development may offer in terms of responding to the genuine need for well-designed and located seniors housing.

Should you require any information please contact me on extension 1416.

Andrew Donald
Integrated Planning