

ATTACHMENT NO 3

**REQUEST TO CONTRAVENE BUILDING HEIGHT
DEVELOPMENT STANDARDS**

**STATE ENVIRONMENTAL PLANNING POLICY
(HOUSING FOR SENIORS OR PEOPLE WITH A
DISABILITY) 2004**

**ALTERATIONS AND ADDITIONS TO ST. HEDWIG
VILLAGE
134-140 RESERVOIR ROAD BLACKTOWN**

**Prepared for
St. Hedwig Village**

**By
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1.0 INTRODUCTION:

This is a request to contravene development standards relating to the development application for alterations and additions to the St. Hedwig Retirement Village at No. 134-140 Reservoir Road Blacktown. This request is made in accordance with Clause 4.6(3) of Blacktown Local Environmental Plan 2015 (the LEP). Relevant provisions of Clause 4.6 are as follows;

- (1) *The objectives of this clause are as follows:*
 - (a) *to provide an appropriate degree of flexibility in applying certain development standards to particular development,*
 - (b) *to achieve better outcomes for and from development by allowing flexibility in particular circumstances.*
- (2) *Development consent may, subject to this clause, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However this clause does not apply to a development standard that is expressly excluded from the operation of this clause.*
- (3) *Development consent must not be granted for development that contravenes a development standard unless the consent authority has considered a written request from the applicant that seeks to justify the contravention of the development standard by demonstrating ;*
 - (a) *that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case, and*
 - (b) *that there are sufficient environmental planning grounds to justify contravening the development standard.*
- (4) *Development consent must not be granted for development that contravenes a development standard unless:*
 - (a) *the consent authority is satisfied that:*
 - (i) *the applicant's written request has adequately addressed the matters required to be demonstrated by subclause (3), and*
 - (ii) *the proposed development will be in the public interest because it is consistent with the objectives of the particular standard and the objectives for development within the zone in which the development is proposed to be carried out, and*
 - (b) *the concurrence of the Secretary has been obtained.*
- (5) *In deciding whether to grant concurrence, the Secretary must consider:*

- (a) *whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and*
- (b) *the public benefit of maintaining the development standard, and*
- (c) *any other matters required to be taken into consideration by the Secretary before granting concurrence.*

2.0 DEVELOPMENT STANDARD:

The development standards to which this request relates are the building height standards contained in Clause 40(4)(a) and (b) of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (the SEPP) in part as follows ;

40(4) If the development is proposed in a residential zone where residential flat buildings are not permitted:

- (a) *The height of all buildings in the proposed development must be 8.0 metres or less, and*
- (b) *A building that is adjacent to a boundary of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) must not be more than 2 storeys in height.*

Clause 4 of the SEPP defines height as;

Height in relation to a building, means the distance measured vertically from any point on the ceiling of the topmost floor of the building to the ground level immediately below that point.

The SEPP does not contain objectives relating to the building height development standards contained in Clause 40(4). In the absence of such objectives in the SEPP it is reasonable to conclude that the purpose of these standards is as stated in the objectives for the building height development standard contained in Clause 4.3 of Blacktown LEP 2015 as follows ;

- (1) (a) *to minimise the visual impact, loss of privacy and loss of solar access to surrounding development and the adjoining public domain from buildings,*
- (b) *to ensure that buildings are compatible with the height, bulk and scale of the surrounding residential localities and commercial centres within the City of Blacktown,*
- (c) *to define focal points for denser development in locations that are well serviced by public transport, retail and commercial activities,*
- (d) *to ensure that sufficient space is available for development, retail, commercial and residential uses,*
- (e) *to establish an appropriate interface between centres, adjoining lower density residential zones and public spaces.*

The above provisions of the SEPP are development standards and not a prohibition as they comply with the definition of development standards contained in section 4 of the Environmental Planning and Assessment Act 1979 relevantly as follows ;

***Development standards** means provisions of an environmental planning instrument or the regulations in relation to the carrying out of development, being provisions by or under which requirements are specified or standards are fixed in respect of any aspect of that development including, but without limiting the generality of the foregoing, requirements or standards in respect of;*

- (a) *the area, shape or frontage of any land, the dimensions of any land, buildings or works, or the distance of any land, building or work from any specified point,*
- (c) *the character, location, siting, bulk, scale, shape, size, height, density, design or external appearance of a building or work.*

Clause 40(4) of the SEPP relates to the height dimension and number of storeys of a building and therefore falls under the definition of development standards contained in the Act.

3.0 EXTENT OF CONTRAVENTION:

The extent to which the proposed development exceeds the SEPP height development standards is shown on the amended development application plans. The extent of departure from the standard varies for each of the proposed new buildings in the following range.

Building	Extent of Departure from Height Standard	
	Metres	Storeys
Stage 1 Self-contained dwellings		
Northern building	0.240-2.58	3
Southern building	1.5-5.23	4-5
Stage 2 aged care facility	0.150-3.73	3-4
Chapel bell tower	1.63	

The attached height calculation diagrams show the height in relation to the 8 metre height standard contained in the SEPP.

4.0 DEVELOPMENT STANDARD OBJECTIVES:

In the absence of specific height control objectives contained in the SEPP it has been found that the proposed development is consistent with the LEP objectives for the building height development standard as outlined in 2.0 above for the following reasons;

(a) Impact on Surrounding Development and Public Domain:

(i) Visual Impact:

Eastern (Front) Elevation:

On its eastern elevation the proposed development will be visible from Reservoir Road and St. Michaels School opposite. On the front eastern elevation the development comprises two buildings separated by a low level reception building and open pedestrian corridors.

At its closest point the northern building will be set back 11.1 metres from the front boundary. Other building elements are set back 12.0-22.0 metres. This building will have a height of 10.315-11.15 metres from natural ground level but due to landscaping the maximum height will be 10.7 metres. The building is extensively modulated and its appearance will be softened by proposed landscaping.

The ground level of the southern building facing Reservoir Road will be setback 19.0 metres from the front boundary with two storey balconies above set back 12.5 metres over a width of 12.6 metres. On its upper level the building is stepped back from the front for a distance of 15.5 metres and 28.9 metres from the street frontage. To accommodate the community and support service facilities the ground floor ceiling height of this building is 3.8 metres. The building is extensively modulated, including its stepped design, and proposed landscaping will soften its appearance.

Within the front set back area are located an access driveway, visitor parking, ambulance bay and landscaping. The combination of building design, front setbacks, stepped design and landscaping has the effect of minimising visual impact when viewed from Reservoir Road and the school opposite.

Stage 1 Northern Elevation:

On this elevation the building comprises three storeys with height as shown on the attached diagram. The building will have a setback of 6.0-16.0 metres from the northern side boundary. The building will face a child care centre over a common boundary length of approximately 70.0 metres and a medium density housing development over a common boundary length of approximately 58.0 metres. The child care centre has a northern orientation away from the subject property.

To the west of the child care centre a two storey medium density dwelling is located approximately 2.0 metres from the common side boundary with the subject property. The proposed development will be located minimum 6.0 metres from the boundary and approximately 9.5 metres from the dwelling. The existing two storey development on the subject site is located 1.0-5.0 metres from the side boundary adjacent to this dwelling.

The development faces three other dwellings in the medium density development. These are separated by a 5.0 metre wide perimeter access road within the housing site and a 6.0 metre set back within the subject site.

It has been found that by a combination of the characteristics of the developments on the adjoining lands together with the design of the proposed building, including setbacks and proposed landscaping that the visual impact of the proposed development on the adjoining property to the north will be minimised.

Stage 1 Southern Elevation:

This building has a height of 4-5 levels over a length of 75.0 metres on its southern elevation. The building is stepped back from its front on the upper level for a distance of 16.2 metres. For a length of approximately 38.5 metres from the Reservoir Road frontage there is a common boundary with a single residential zoned allotment No. 144 Reservoir Road. This property is developed with a single storey dwelling house located approximately 20.0 metres from the road frontage. At the rear of the dwelling is located heavily wooded land zoned for environmental protection. The dwelling house is located approximately 5.6 metres from the side boundary and approximately 14.5 metres from the proposed building. When viewed from No. 144 the proposed building will be seen as a significant building element. However the main aspect of the dwelling is to the east across the 20.0 metre front yard to Reservoir Road. Outlook to the west and south is across wooded land designated for environmental protection. Having regard to the setback of the dwelling from the common side boundary and the open space outlook to the east, west and south the visual impact of the proposed development is minimised.

Stage 2 Aged Care Facility:

The proposed age care facility building is located adjacent to bushland open space to the north and south. On its northern elevation the building substantially complies with the LEP 9.0 metre height standard. It is separated from the adjacent open space land by a perimeter access road 5.0 metres wide within the St. Hedwig site. The closest part of the building is setback a minimum 6 metres from the northern boundary. Having regard to the building height, design and setback no adverse visual impact will occur when viewed from the adjoining private open space land.

On its southern elevation the proposed aged care facility building will comprise three levels of accommodation above basement parking. It will have a height ranging from 12.44 to 12.87 metres. This building height is generally similar to the height of the existing nursing home building at 12.38 metres on a 1.5 metre setback from the southern side boundary. The proposed building comprises three separate wings separated by 7.0-8.0 metre wide court yards. The building is separated from the adjoining environmental protection land by a perimeter access road 5.5 metres wide. The closest part of the building is set back a minimum of 6 metres from the southern boundary. Having regard to the building height, design and setback no adverse visual impact will occur when viewed from the adjoining environmental protection land.

Chapel:

The proposed chapel incorporates a bell tower with spires above. The attached height calculation diagram shows the tower height. The SEPP height standard refers to height measured vertically to the ceiling of the top most floor of a building.

As shown on the application plans and photomontage 6 the bell tower and spires have been designed to be an attractive element within the St. Hedwig site and to complement the design of adjacent buildings. These elements will not have any adverse impact on the environment of the area.

(ii) Loss of Privacy:

Stage 1 Building North:

Due to the northern orientation of the child care centre and the proposed building setback no unreasonable privacy impact will occur to that property.

Four medium density dwellings will be located opposite the proposed building. Three of these are separated by a distance of 8.0-20.0 metres including a perimeter access road. The private open space of these dwellings is on the northern side and not visible from the proposed development. Having regard to the character of the three dwellings and the design, setback and landscaping privacy impact on these neighbouring properties will be minimised.

One medium density dwelling is located to the west of the child care centre and approximately 2.0 metres from the common side boundary with the subject property. The rear yard of this dwelling adjoins the common boundary. This dwelling and its rear yard is presently over viewed by the existing two storey dwelling units on the subject site which are located 1.0-5.0 metres from the side boundary. At the point where the existing development on the subject property is located 1.0 metre from the side boundary the new building will be set back approximately 10.0 metres and at its closest point 6.0 metres from the boundary. Having regard to the existing privacy relationship, the design, including external screening, the set back of the proposed development, the existing trees to be retained and proposed new landscaping, loss of privacy to this dwelling is significantly improved.

Stage 1 Building South:

The principal orientation of this building is to the north. Only secondary windows face to the south. This design has the effect of minimising privacy impact on the neighbouring property to the south at No. 144 Reservoir Road.

Stage 2 Building:

The proposed age care facility building is adjacent to open space land to the north and environmental protection land to the south. It will therefore not result in any loss of privacy.

(iii) Solar Access:

Clause 6.10.6 of Blacktown DCP 2015 provides guidelines in relation to internal and external shading and solar access. The shadow diagrams submitted with the development application demonstrate that the proposed development will comply with the DCP requirement that *living rooms and private open spaces for at least 70% of apartments in the development must receive a minimum of 3 hours direct sunlight hitting their primary window surfaces between 9am and 3pm on 21 June*. The proposed development also satisfies the DCP requirement that 50% of common open space area at ground level received a minimum of 3 hours of sunlight between 9am and 3pm on 21 June.

The shadow diagrams submitted with the development application show that at mid winter the proposed development will cast a shadow on adjoining land to the south comprising land zoned for environmental protection purposes and a single residential allotment fronting Reservoir Road. The diagrams show that at mid winter at 9am the whole of the front yard and the front wall of the dwelling house on the adjoining property is unaffected by shadow. By midday the majority of the front yard of the property and approximately 50% of the rear yard is unaffected by shadow. Shadow impact is greatest by 3pm at mid winter. The diagrams show that the DCP requirement that *at least 50% of the principal area of ground level open space in adjacent properties shall not have their solar access reduced to less than 2 hours between 9am and 3pm on 21 June* is complied with. The development application is also accompanied by shadow diagrams for the equinox and midsummer. These indicate at these times the adjoining residential allotment to the south is substantially unaffected by shadow from the proposed development.

(b) Compatibility with Scale of Surrounding Residential Localities:

The subject property is located on the southern periphery of the Blacktown residential zone on the western side of Reservoir Road.

The area in which the subject property is located is characterised by land uses and buildings of various type and height, bulk and scale. Approximately half of the adjoining land to the north of the subject property is developed with a single storey child care centre and two storey attached and detached medium density housing. The single adjoining residential site to the south is developed with a small older style single storey dwelling. The LEP 9.0 metre height standard applies to these sites. The majority of land surrounding the site is open space and environmental protection land with no LEP height limit.

On the opposite side of Reservoir Road is the St. Michaels school and church complex including numerous buildings and playing fields. The site is zoned SP2 – Infrastructure – Educational Establishment and Place of Public Worship. The LEP height standard does not apply to this extensive site.

The form of development which has been approved and built upon the subject property over the past 30 years comprises a seniors housing village incorporating nursing home, hostel and multi level self-contained dwellings. These buildings contain 2-3 storeys and height up to 12.38 metres. The development also incorporates large areas of landscaped grounds. The development has been carried out under a state environmental planning policy introduced by the State Government to facilitate specialist housing for seniors and people with a disability. The current SEPP and earlier versions of it enable development of a character and scale significantly different to that which has occurred in the surrounding residential localities.

Whilst the form of the existing and proposed development is of a greater height, bulk and scale compared to adjacent residential development, for the reasons outlined, the development will not result in any unreasonable adverse impacts on the surrounding area.

It is therefore concluded that the proposed development satisfactorily relates to and is compatible with the surrounding residential locality.

(c) Focal Point for Denser Development:

Since 1985 the St. Hedwig site has been identified as a site suitably located for the development of a seniors housing village. This development has been carried out under the provisions of a State Environment Planning Policy which facilitates development of a greater density than other single dwellings or medium density housing in the area. The site is well serviced by public transport providing access to retail and commercial activities.

(d) Space for Residential Uses:

The subject site has been identified and developed for specialist housing for seniors and people with a disability. Having regard to the transmission line easement constraint and the need to provide for spacious grounds and building setbacks from boundaries sufficient space is available to accommodate the proposed development.

(e) Zone Interface:

The design of the proposed development is of a high quality and incorporates significant boundary setbacks. Having regard to the character of development on adjoining sites and the locality generally, there is an appropriate interface with adjoining lower density residential zones and the public spaces.

5.0 ZONE OBJECTIVES:

It has been found that the proposed development is consistent with the LEP objectives for Zone R2 – Low Density Residential for the following reasons;

(a) St. Hedwig Village has identified a need for increased specialist community housing for seniors and people with a disability. The identified community need is in the form of aged care facility and self-contained dwellings. This housing is to be provided in a high quality development in spacious landscape grounds by a not for profit housing provider. The development has been designed to be compatible with the adjacent low density residential environment.

(b) The proposed development incorporates facilities to meet the day to day needs of residents. These facilities include a range of community and recreational facilities, and where required, meals, support services and full nursing care. The development also incorporates a chapel.

(c) The existing and proposed development on the site is of a different character and scale to other developments in the Blacktown LEP R2 - Low Density Residential Zone. As indicated above the development will not unreasonably adversely affect the amenity of the neighbourhood.

6.0 ENVIRONMENTAL PLANNING GROUNDS:

The environmental planning grounds that justify contravening the SEPP building height development standards are;

- (a) The proposed seniors housing development is consistent with the aim of Blacktown LEP 2015:
 - (b) *to ensure that appropriate housing opportunities are provided for all current and future residents through diversity of housing choice.*
- (b) The development is consistent with the aims of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004. As follows:
 - 2 (1) *This Policy aims to encourage the provision (including residential care facilities) that will:*
 - (a) *increase the supply and diversity of residences that meet the needs of seniors or people with a disability, and*
 - (b) *make efficient use of existing infrastructure and services, and*
 - (c) *be of good design.*
- (c) The Blacktown City Ageing Profile 2012 identifies that the 2011 Census Data shows that Blacktown's population has aged since 2006, with the largest increase in the 60-64 age group. The population is expected to rapidly age in the next 20 years with the number of local residents aged 65 and over to approximately double, from 26,198 to 52,971. The profile report also states that knowing this, there is a clear need for Council to undertake long-term planning to ensure that its activities, programs, services, partnerships and resources can adequately meet the challenges associated with its growing aging population. The scale of the proposed St. Hedwig development is in response to this demographic trend and the need to provide suitable housing options and care facilities for an aging population. St. Hedwig Village provides five levels of aged care and with the proposed development will be well placed to cater for the projected demand by providing modern, well designed specialist housing and care facilities.
- (d) St. Hedwig Village has identified a need for an additional aged care facility and self-contained dwelling housing for seniors and people with a disability. The scale of development proposed reflects the extent of the identified need. Provision of this housing will result in a significant social benefit for residents of Blacktown and beyond.
- (e) St. Hedwig Village is operating from buildings that are 30 years old. Whilst there have been continuous refurbishments and improvements over the years facilities, in part, are no longer attractive to the new generation of retiree's expectations, and have limitations in catering to the projected needs of seniors. St. Hedwig Village is faced with winding down operations or redevelopment.

St. Hedwig Village was developed with substantial Federal Government Funding for capital works. The public interest is therefore a major stakeholder in the desire to maintain operational facilities to service the aged

care needs of Blacktown's seniors. As an aged care provider St. Hedwig Village has a duty and responsibility to maintain its facilities to comply with accreditation standards in order to obtain operation funding of its residents.

St. Hedwig Village is a registered charity/not-for-profit organisation and is a provider of housing to seniors. The development application proposes a state of the art integrated seniors village providing a continuum of care for seniors including independent living, assisted living, nursing home accommodation and a range of support services including meals, cleaning services, personal care, nursing care as well as facilitating the delivery of medical and allied health services to residents.

As a not-for-profit aged care provider St Hedwig Village has limited financial resources. The proposed development and its staging has taken into consideration the use of St. Hedwig Village resources with accountability and risk minimisation. The proposed scale of development is necessary to justify this objective and deliver a viable outcome.

- (f) The St. Hedwig village is an established seniors housing containing existing buildings which substantially exceed the LEP height standard.
- (g) Other than for the single cottage site at No.144 Reservoir Road, the St. Hedwig site is located on the southern periphery of the LEP low density residential zone on the western side of Reservoir Road. To the south land is zoned for environmental protection extending to Holbeche Road. Further south is located the Blacktown Workers Club and a three storey motel. Further to the south is industrial land extending to the M4 motorway. The LEP height standard does not apply to any of these lands.

The existing character of the Reservoir Road streetscape in the vicinity of the site is mixed and varied reflected in the nature of land use and land use zoning. Approaching from the south, the streetscape character is influenced by the rear fences of two-storey residential buildings and associated outbuildings of properties fronting an internal street (Farmingdale Drive)B beyond is St. Michaels Primary School comprising a variety of building styles in an educational vernacular with associated playing fields and structures including security perimeter fencing. On the western side of Reservoir Road approaching from the south, is land within an environmental protection zone with a woodland character providing a vegetated screen to development on the site and the single storey dwelling house to the south of the site.

- (h) Only approximately 33% of the St. Hedwig site boundaries adjoin residential zoned land. Approximately 77% of the boundaries adjoin or are adjacent to open space, environmental protection and infrastructure zoned land.
- (i) Development on the St. Hedwig site is constrained by a transmission line easement 30.0 metres wide extending diagonally through the centre of the site. This area comprises approximately 3150 square metres (12.6%) of the site which cannot be built on.

The attached drawing no '1508-025-area and % of 4 levels and possible buildable area if no easement' shows the foot print and floor areas for buildings that could be constructed on the site if it was not affected and constrained by the easement. On the basis of three storey buildings it has been calculated that 5386.8 square metres of floor space could be achieved. Instead, the fourth level of the southern building is proposed to have a floor space of 900.29 square metres. This is only 3.6% of the total site area.

- (j) The design concept for the self-contained dwellings buildings has been adopted to retain the central courtyard and landscaped area to provide enhanced amenity for residents and provide a better outcome. An alternative design incorporating two storey buildings and complying with the SEPP 8.0 metre height standard would occupy a greater area of the site resulting in less open space and landscaped area.
- (k) The reason the proposed Stage 1 building adjacent to the northern boundary exceeds the SEPP height standards is mainly due to the fact that the design makes the external central court and landscaping easily accessible from all dwellings and community rooms and also to provide a very gentle access path to the centrally located aged care facility to the west to encourage interconnectivity. If the building is stepped or lowered (in full or in part), this would have negative implications in regard to accessibility and for the residents ability to access all external areas without assistance or mechanical means. It would reduce connectivity between the residents of the various parts of the facility which would be detrimental to the pivotal idea of an open and integrated aged care facility for people over 55 in various need of support and care.
- (l) A development on the St. Hedwig site complying with the SEPP height standards and providing for suitable boundary setbacks and landscaped open space would result in significantly less self-contained dwellings and aged care facility beds than now proposed for which there is an identified need. This would be contrary to the social public benefit of providing this specialist form of housing for seniors and people with a disability.
- (m) The proposed buildings are higher than the single and two storey development as existing and permitted in the adjoining residential area on land within the R2 Zone. However, there are a number of elements of the development that make it compatible with the streetscape and character of the area. These include:
 - The development is visually broken up into two buildings with generous separation between the buildings and setbacks from the northern and southern boundaries.
 - The buildings present a narrow frontage to the street generally consistent with frontages of other residential buildings to the north;
 - The facades of each building to the streetscape are highly modulated adding to the interest of the buildings and reducing the apparent bulk and scale of the building when viewed from the street;

- The visual dominance of the buildings are attenuated by setbacks and landscaping in addition to facade modelling and building design;
- The buildings remain well below the height of the prevailing tree canopy including the trees to the south of the site in the conservation area and the retained mature trees in the frontage to the site.
- The design of the development is such that the change in scale is gradual and softened by building setbacks to front and side boundaries, the break of the built form to the street, modulated facades, the retained and proposed vegetation and the separation from nearby development. The lack of any clear or consistent character of the immediate area and streetscape is such that the buildings are capable of existing within the streetscape in a vegetated screen to development on the site and the single storey dwelling to the south of the site.

7.0 PUBLIC INTEREST:

It has been demonstrated above that the proposed development is consistent with the LEP zone and height development standard objectives and that the development will not have any unreasonable adverse impact on the surrounding area. The development will result in a significant community benefit by providing needed specialist housing for seniors and people with a disability. In the circumstances the proposed development will be in the public interest.

8.0 CONCURRENCE:

Clause 4.6(4)(b) of the LEP provides as follows ;

- (4) *Development consent must not be granted for development that contravenes a development standard unless;*
 - (b) *the concurrence of the Secretary has been obtained.*

Clause 4.6(5) refers to the matters to be considered by the Secretary as follows ;

- (5) *In deciding whether to grant concurrent, the Secretary must consider*
 - (a) *whether contravention of the development standard raises any matter of significance for State or regional environmental planning,*
 - (b) *the public benefit of maintaining the development standard, and*
 - (c) *any other matters required to be taken into consideration by the Secretary before granting concurrence.*

Having regard to the location of the subject site and the character and scale of the proposed development the proposed contravention of the building height development standard does not raise any matter of significance for State or regional environmental planning.

It has been demonstrated above that the contravention of the SEPP building height standards as proposed will result in a development that will provide significant public benefit by the provision of required housing for seniors and people with a disability. In the circumstances of

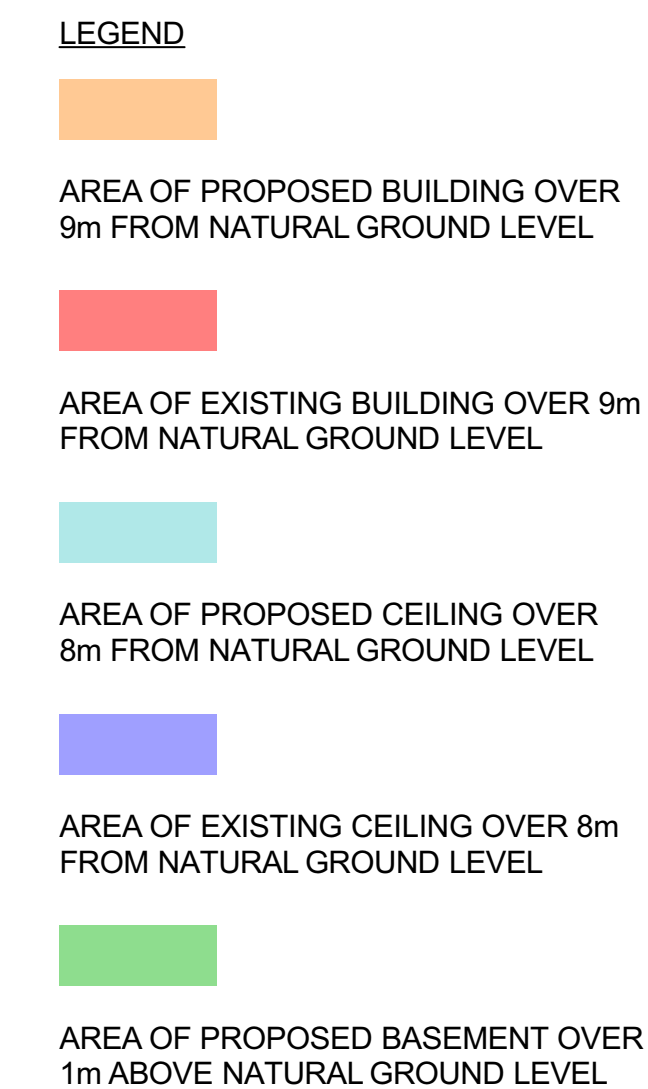
this case there is no public benefit in maintaining the development standards. The extent to which the proposed development contravenes the building height standards will not be contrary to the public benefit.

9.0 CONCLUSION:

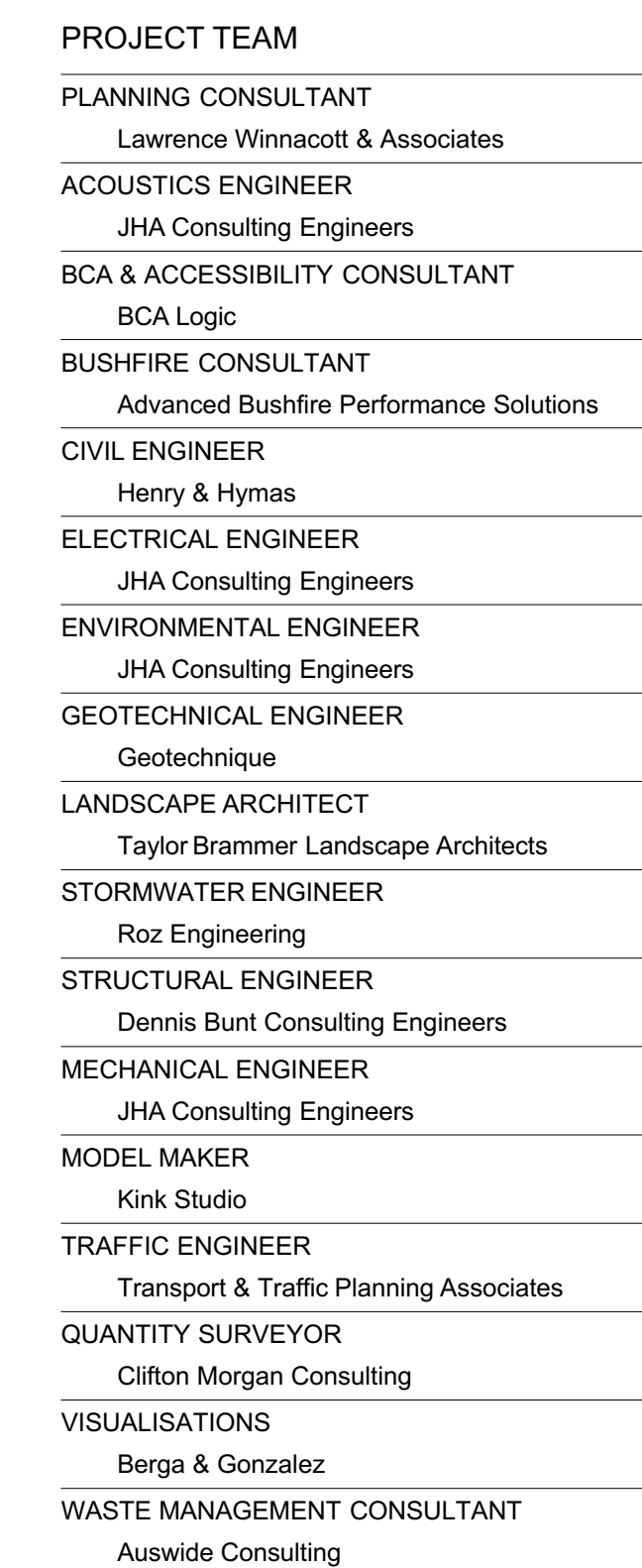
It has been demonstrated above that the proposed development which contravenes the SEPP height development standards is consistent with the objectives for the standard (contained in the LEP) and also the objectives for the R2- Low Density Residential Zone. It has therefore been concluded that the development will be in the public interest. It has also been demonstrated that there are significant environmental planning grounds to justify contravention of the development standard. Therefore compliance with the development standard is unreasonable and unnecessary in the circumstances of the case.

For the reasons outlined above it is justified to provide an appropriate degree of flexibility in applying the development standard. By allowing flexibility a better outcome will be achieved in the provision of housing for seniors and people with a disability in a high quality development incorporating spacious landscaped grounds.

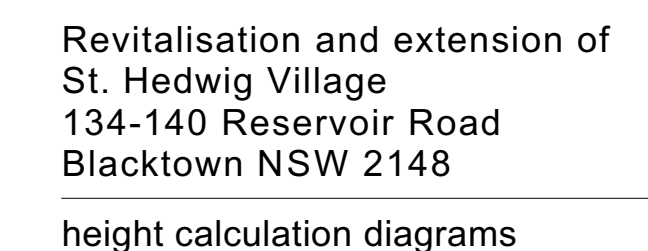
It has been concluded that it is warranted for the provisions of Clause 4.6 of the LEP to be exercised to enable consent to be granted to the proposed development.



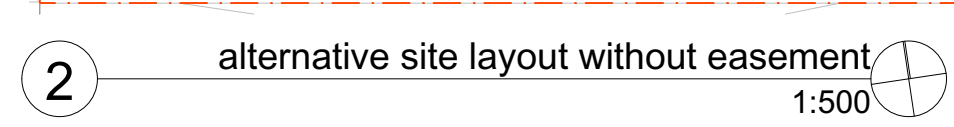
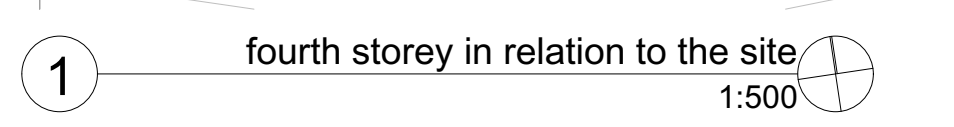
1 ————— height plane
1:500



2 ceiling plane 1:500



3 diagram storey 1:500



A	10 FEB 2017	DA ISSUE - AMENDMENT
	DATE	AMENDMENTS

Revitalisation and extension of
St. Hedwig Village
134-140 Reservoir Road
Blacktown NSW 2148

area and % of 4 levels and possible
buildable area if no easement

DWG NO.	1508-025	ISSUE	A
DATE	10 FEB 2017	SCALE	1:500
STATUS	DA	PAPER	A1
PROJECT NAME	1508 St. Hedwig		

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