

14 December 2018

Mr Stuart Withington
Manager
Planning Panels Secretariat
GPO Box 39
Sydney NSW 2001

Dear Mr Withington

**DEVELOPMENT APPLICATION DA2018/0995 – MIXED USE DEVELOPMENT, 5
SKYLINE PLACE, FRENCHS FOREST**

We write on behalf of Platino Properties (the Applicant) in relation the above DA.

We note that Northern Beaches Council (Council) has completed its assessment report and forwarded its recommendation to the Sydney North Planning Panel (SNPP).

In consultation with the Applicant and other key consultants, we have carefully reviewed Council's assessment report and consider that there are a number of issues raised in the report which warrant a response and clarification.

This submission, and the accompanying information at Attachments 1- 10, addresses these issues and is provided for the consideration of the SNPP prior to its determination of the DA.

STRATEGIC PLANNING CONSISTENCY

Council asserts that the proposal is inconsistent with relevant strategic and metropolitan planning documents for Sydney and the strategic direction for Frenchs Forest. It also asserts that the proposal does not meet the objectives of the B7 zone.

Council also states that under the Northern Beaches Hospital Precinct Structure Plan (HPSP), the B7 Business Park is identified to be retained and allowing a seniors living development through the Seniors SEPP would pre-empt future planning and set a precedent leading to the further loss of productive employment land.

In response to issues raised in Council's report, we make following key points:

- It is the clear intention of the Greater Sydney Region Plan and the North District Plan that Frenchs Forest is to progress to a mixed-use health, education and innovation precinct.
- The proposed development is consistent with the evolution of a Health and Education Precinct as outlined in the Greater Sydney Region Plan.
- The proposal is permissible with consent on the subject land under the provisions of *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* (Seniors SEPP) and there is no legal requirement for the proposal to demonstrate consistency with the objectives of the B7 zone. Notwithstanding, the B7 zone objectives

have been fully considered in the SEE. Furthermore, the proposal is wholly consistent with the aims of the Seniors SEPP.

- Council's characterisation of the Frenchs Forest B7 Business Park zone as having a fundamentally industrial employment character fails to acknowledge the existing and continuously evolving mixed use character of the zone. The B7 zone permits a diverse mix of non-industrial uses, including *centre-based child care facilities, respite day care centres, hospitals, and hotel and motel accommodation*. This demonstrates that the zone contemplates and can accommodate a range of a more sensitive, non-industrial uses which can co-exist with other business activities, without resulting in unacceptable land use conflicts.
- Furthermore, the character of the locality is continuing to evolve in accordance with its status as a Health and Education Precinct. This is exemplified by recent development approvals in the zone including:
 - Construction of a private hospital with 100 beds and multiple health care services at 11 Tilley Lane, Frenchs Forest
 - Redevelopment of the Parkway Hotel Site, including demolition works, alterations and additions to a licensed premises (hotel), construction of a 100 bed hotel and retail premises, at 39 Frenchs Road East, Frenchs Forest
- Council asserts that the proposal is inconsistent with metropolitan planning for Sydney as it will lead to a loss of urban services found in the Frenchs Forest Business Park and therefore does not meet the "retain and manage" principle for industrial and urban services. This assertion relies on an incorrect characterisation of the B7 Business zone as being largely industrial, which is not the case with the Frenchs Forest business park as the B7 zone prohibits many "urban services" including industries, vehicle repair stations and depots and the like¹. The "retain and manage" principle is therefore not applicable in this case.

A detailed assessment of the proposal against these documents is contained in Section 5 of the SEE. This assessment has been revised and updated to specifically respond to issues raised by Council (**Attachment 1**).

SUITABILITY OF THE SITE FOR THE PROPOSED DEVELOPMENT

- The site is demonstrably suitable for seniors housing given its location on the fringe of the B7 Business Park in close proximity to the Northern Beaches Hospital and future town centre as well as existing transport services. It will contribute to the clustering of uses that will facilitate the growth and long term viability of the health and education precinct, without impacting on larger areas of B7 zoned land to the south of Warringah Road which are not physically or functionally connected to the hospital (**Attachment 2**).
- The location on the edge of the B7 zone will provide for an effective transition between low density residential uses and a range of other existing and future uses within the business park.

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- ¹ Urban services land is described in the Region Plan as: *Industries that enable the city to develop and its businesses and residents to operate. Support the activities of local populations and businesses. Include **concrete batching, waste recycling and transfer, printing, motor vehicle repairs, construction depots, and utilities (electricity, water, gas supply)**.*
 - Under the *Warringah Local Environmental Plan 2011* (WLEP 2011), the **B7 zone prohibits industries, waste or resource management facilities, vehicle body repair workshops, vehicle repair stations and depots.**

ECONOMIC IMPACTS

A detailed economic impact assessment (EIA) was undertaken by HillPDA in support of the DA. HillPDA has now provided supplementary advice addressing issues raised by Council (**Attachment 3**). In summary, key points include:

- The proposal retains the existing B7 Business Park zoning of the site and will increase the employment capacity of the site. Specifically, the proposal provides 1,348m² of new office and allied health floorspace and around 55 new/additional jobs on-site.
- The proposal is for seniors housing, which is operated as a business unlike most other forms of residential accommodation. The proposal will not provide a precedent for general residential development in the Frenchs Forest business park.
- There is considerable capacity in the Frenchs Forest business park for future employment-related development and the proposed development will not impede the continued operation or future intensification of this activity at the business park.
- The proposal is likely to attract allied health care workers and other health professionals, leading to employment growth across a range of industries including health professionals.
- The proposal is consistent with the evolution of Frenchs Forest to a mixed use innovation precinct, and it is also consistent with the relevant objectives of the Greater Sydney Region Plan and the North District Plan as it will broaden the range of employment opportunities within a range of land uses.

BUILT FORM AND URBAN DESIGN

We note Council's comments in relation to the character, bulk and scale of the proposal and its relationship to the character of the locality.

It is important to note that housing for seniors is a specific residential typology that differs substantially from general residential housing. As a result, it is generally acknowledged that a number of the provisions and design requirements in *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development* (SEPP 65) and the Apartment Design Guide (ADG) cannot be strictly applied to this form of housing.

These operational requirements, in particular to offer unit accessibility that will allow residents to age-in-place, have contributed to the built form of the proposed development, and it is inappropriate to strictly apply the provisions of the ADG to the proposal without proper regard to the distinction between the design requirements for seniors living and general residential development.

Supplementary advice prepared by One Fell Swoop (**Attachment 4**) identifies the current trends of seniors development and notes that the proposed design, unit mix and sizes are consistent with market demand.

Bulk and Scale

Council's report argues that the bulk and scale of the proposal is incompatible with the current and desired character of the locality.

Response

- There is no applicable height or FSR control for the site, indicating that the planning controls for the site envisage a larger-scale built form character for the zone, including sites in close proximity to existing residential areas.
- The existing built form character of the B7 zone, including the Frenchs Forest Road frontage, is characterised by large floor plate, multi-level warehouse and commercial buildings.
- The proposed building is significantly lower than the proposed building heights in the Structure Plan, including the hospital (40 metres) and higher density residential sites to the east of the new hospital (27.5 metres and 34 metres). The proposed built form provides a suitable transition in building heights away from the hospital and town centre to the west and the bulkier building forms to the south towards the lower density residential development to the north.
- Recent approvals including the private hospital in Tilley Lane and the expansion of the Parkway Hotel to include 100 hotel rooms and a drive through bottle shop represent an evolution of the height, bulk and scale of building forms within the B7 Business Park zone.
- Council has also raised concern with the length of the building and recommends a revised design with the built form broken into smaller blocks to provide greater articulation and a better relationship to residential development to the north. As noted above, the existing built form character of the B7 zone is of large-scale, large footprint commercial and industrial buildings. The proposed building is the same length (approximately 84 metres) as the existing building on the site at 1 Skyline Place.
- Furthermore, there are multiple existing buildings within the immediate locality with a length equivalent to or greater than the proposal. This includes the building to the east at 125 Frenchs Forest Road (with direct frontage to the road) which has a length of approximately 120 metres (**Attachment 5**).
- Supplementary advice by a specialist seniors living Architect, Sue Kenny (**Attachment 7**) notes that the separation of the proposal into separate blocks would neither be practical nor operationally viable for a senior's living development. All seniors units must be fully enclosed, secure and have easy access to two lifts, reasonably suggesting one single building on the site.
- The proposed development includes a substantial 9.2 metre landscaped setback from Frenchs Forest Road, which includes extensive landscaping comprising the retention of existing mature vegetation and new plantings. This will contribute to a significant landscaped buffer between the proposal and existing lower density residential development to the north.

SEPP 65 and ADG Compliance

- Council states that the proposal is inconsistent with a number of design requirements in *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development* (SEPP 65) and the Apartment Design Guide (ADG).

Response

A detailed review of the proposal against SEPP 65 and the ADG was included in Appendices 9 and 10 of the SEE.

We have undertaken a further review of the proposal against relevant ADG and Seniors SEPP provisions in response to Council's comments (**Attachment 6**), which demonstrates a high level of overall consistency with all provisions.

POTENTIAL DESIGN AMENDMENTS

Notwithstanding the above arguments in support of the proposed design of the development, following consideration of Council's comments and on-going liaison with the proposed operators of the development, the Applicant has identified a number of potential design refinements to the proposal (**Attachment 8**). The Applicant would be open to amending the scheme to incorporate these refinements, either through amended plans prior to determination or through conditions of consent requiring the submission of amended plans prior to construction certificate.

These potential design refinements include:

- relocation of the community garden to the west of the site
- removal of rooftop communal area and relocation to Level 2
- removal of 3 units on Level 2 to accommodate relocated rooftop communal area
- removal of 7 units on Level 5 and replace with 4 units and an increased setback with terraces
- removal of 4 units on Level 6 and replace with 1 x 3 bed unit
- height reduced from RL182.52 to RL179.80 (reduction of 2.72 metres)
- terracing of the upper levels to follow the topography and therefore reducing the overall bulk and mass of proposal
- amended colour scheme to provide greater articulation of the building façade
- inclusion of seating bays along interior corridors
- a recessed zone in from the corridor for each apartment, including different architectural/interior design treatments for each apartment entry
- overall reduction of units from 78 to 69

CONTAMINATION

We note that Council's report states that on the basis of the Preliminary Site Investigation submitted with the DA, the proposal does not meet the requirements of *State Environmental Planning Policy No. 55 (Remediation of Land)*.

This issue was not raised in any previous Council correspondence to the Applicant, including its issues letter dated 13 September 2018.

The Applicant's contamination consultant, Benviron Group, has provided supplementary advice that (**Attachment 9**) land can be made suitable for the proposed development subject to additional assessment.

The advice further states:

...a detailed investigation is not practicable at this stage as to undertake borehole sampling would require that the building and hardstand areas that currently exist on the site to be demolished.

We would anticipate that a condition of development consent would require that any necessary detailed investigation must be undertaken prior to the issue of a construction certificate, and this would meet the requirements of clause 7(3) of SEPP 55. An early works DA could be issued to this effect which allows demolition and some minor excavation along with detailed investigation parameters.

STORMWATER

Council states that the stormwater concept plan submitted with the DA cannot be supported as detailed modelling and sections of the OSD tank and pipes have not been submitted.

We note that Council did not raise these issues in its correspondence to the Applicant dated 13 September 2018.

However, in response to Council's assessment report, the project engineer has provided supplementary advice (**Attachment 10**) that the stormwater design was undertaken using DRAINS and was based on pre and post development scenarios. The advice also states that the issues raised by Council can be addressed at the detailed design stage, prior to the issue of a Construction Certificate, and subject to appropriate conditions of development consent. We note that Council's draft conditions, provided to the Applicant on 14 December 2018, include relevant conditions addressing these matters.

CONCLUSION

On the basis of the above, we consider that there are strong grounds for the conditional approval of the proposed development.

Please do not hesitate to contact Dan Keary on 8459 7511 or dan@keylan.com.au in the first instance if you wish to discuss any aspect of this letter.

Yours sincerely



Dan Keary BSc MURP MPIA
Director

Attachments:

Attachment 1	Strategic Planning Assessment, Keylan Consulting Pty Ltd
Attachment 2	Analysis of surrounding B7 Business Park, Keylan Consulting Pty Ltd
Attachment 3	Economic Impact Assessment – Supplementary Advice, HillPDA
Attachment 4	Supplementary Advice, One Fell Swoop & Oak Tree Group
Attachment 5	Building Frontage Measurements, Keylan Consulting Pty Ltd
Attachment 6	Assessment against ADG and Seniors SEPP, Keylan Consulting
Attachment 7	Supplementary Architectural Advice, Sue Kenny
Attachment 8	Revised Scheme, PA Studio
Attachment 9	Supplementary Advice – Contamination, Benviron Group
Attachment 10	Supplementary Advice – Stormwater, ING Consulting Engineers

Attachment 1

**Strategic Planning Assessment
prepared by
Keylan Consulting Pty Ltd**

Attachment 1 – Strategic Planning Assessment

Development Application DA2018/0995 – Mixed use development, 5 Skyline Place, Frenchs Forest

Strategic Document	Keylan Response
Greater Sydney Region Plan	<ul style="list-style-type: none"> It is the clear intention of the Greater Sydney Region Plan for Frenchs Forest to progress to a mixed use health education and innovation precinct. The proposed development is consistent with the evolution of a health education precinct as outlined in the Greater Sydney Region Plan also noting that: <ul style="list-style-type: none"> Business Parks, as an office park in the isolated landscape, have been in decline for some time (ABS job numbers show this shift) The relatively low level of amenity within the Frenchs Forest business park is currently impacting on rents making most development unviable, unless related to health services and accommodation because these business types will be prepared to pay a premium to be located close to the Northern Beaches Hospital Health education precincts look to an integration of as a multitude of uses and connectivity There needs to be critical mass and range of lifestyles in the precinct – staving off what can build this critical mass is contrary to current thinking around innovation precincts. Council states that the seniors living component is inconsistent with the <i>Greater Sydney Region Plan (Region Plan) Objective 23 – Industrial and urban services land is planned, retained and managed.</i> The proposal is generally consistent with the priorities and actions of the plans as it provides appropriate and ancillary uses to the health and education precinct, including residential and employment opportunities, which are consistent with the changing character of the Frenchs Forest area and the continuing transition of the Frenchs Forest Business Park into a mixed use area with complementary residential development. This demonstrates that the zone already contemplates and can accommodate a range of a more sensitive, non-industrial uses which can co-exist with other business activities, without resulting in unacceptable land use conflicts. The site is zoned B7 Business Park, not industrial (i.e. IN1 or IN2 as per WLEP 2011). The B7 zone contains a diverse range of non-industrial permissible uses (e.g. child care centres, hotel and motel accommodation, respite day care centres, neighbourhood shops, health services facilities, offices premises) and is more a mixed use zone than an industrial zone. The character of the locality is undergoing significant transformation in accordance with its status as a Health and Education Precinct in the <i>Greater Sydney Region Plan (Region Plan)</i> and <i>North District Plan (District Plan)</i>. This includes the continuing evolution of the B7 Business zone to a more mixed-use zone, exemplified by existing uses such as child care centres and recent development approvals

Strategic Document	Keylan Response
	<p>in the zone including the construction of a 100 bed private hospital and a 100 bed hotel premises.</p> <ul style="list-style-type: none"> • This evolution of the B7 zone, and the subject proposal which is a mixed use development comprising seniors living and health related employment opportunities, is consistent with the following principle from the Region Plan (page 126) and <i>North District Plan</i> (page 69): <i>Not all centres will start as retail centres. Creating jobs and providing services to local communities can be initiated within business parks. However, the built form of these business parks is critical – that is, they need to be developed, from the outset, as urban places which can transition into higher amenity and vibrant places while maintaining their main role as an employment precinct. Councils' retail and employment strategies should provide guidance on the transition of business parks into mixed employment precincts including, where appropriate, ancillary residential developments to support the business park.</i> • The site is ideally located for the proposed mix of uses, given its proximity to the Northern Beaches Hospital. There is a logical North-South delineation along Warringah Road between B7 zoned land immediately adjacent to the hospital site and larger areas of B7 land to the south of Warringah Road which are not physically or functionally connected to the hospital and are therefore suitable for retention for employment purposes not related to the hospital. • The proposal retains the existing B7 Business Park zoning of the site and will increase the employment capacity of the site. • Furthermore, the proposal retains the existing industrial/warehouses uses within proposed Lot 1. • The proposal is consistent with Objective 10 – Greater housing supply, as the proposal responds to the housing needs, choice and demographic characteristics of the existing and future community. The development will predominantly attract seniors who live in the vicinity of the site. Accordingly, this will result in the provision of housing that better satisfies diverse demographic needs. • The proposal is consistent with Objective 21 – Internationally competitive health, education, research and innovation precincts, as the proposal supports the health-based precinct through the introduction of residential accommodation, commercial and retail uses and daily services on a site that is located in close proximity to the Northern Beaches Hospital and that is well serviced by public transport. • As outlined in Objective 22, strategic centres are expected to have high levels of private sector investment, flexibility, co-location of a wide mix of land uses including residential, high levels of amenity and walkability and being cycle friendly, and areas identified for commercial uses. • The proposal is consistent with Objective 22 as it will provide the co-location of health services, seniors housing and complementary allied health services in proximity to the Northern Beaches Hospital, public transport and other daily services.
North District Plan	<ul style="list-style-type: none"> • The <i>North District Plan</i> (District Plan) states that business parks should transition into higher amenity/vibrant places, mixed use precincts with ancillary residential accommodation where appropriate.

Strategic Document	Keylan Response
	<ul style="list-style-type: none"> • The proposal will support the business park's continuing transition into a mixed employment precinct. • The proposed seniors living development responds to the ageing population and growing demand for seniors housing in the Northern Beaches LGA (identified in the District Plan as one of the 4 LGAs with the largest projected increase in the 65-84 age groups up to 2036). • The proposal will significantly increase the number of aged care dwellings within the region, improving housing supply and choice on a site that is co-located with a major health facility. • The proposal is consistent with Planning Priority N3 as it will co-locate seniors housing within walking distance of allied health services, retail and commercial and the Northern Beaches Hospital. • Accordingly, the co-location of these services with the seniors housing component will improve safety, accessibility and inclusion, benefiting all residents and visitors. • Regardless of the future mix of uses that develop within the area, the proposed development would play a complementary role and would be consistent with the North District Plan's vision for "a mix of complementary industry tenants, housing, ancillary facilities and services".
Northern Beaches Hospital Precinct Structure Plan	<ul style="list-style-type: none"> • Council states that the proposal is inconsistent with the <i>Northern Beaches Hospital Precinct Structure Plan</i> as the seniors living component does not meet the vision for jobs growth in the Frenchs Forest Business Park. • The Structure Plan identifies the subject site as land for job growth. The Structure Plan states that the Frenchs Forest Business Park is expected to grow and mature under its current zoning to support the new hospital and deepen the locality's employment base. • The proposal will support this by retaining existing employment on the site and providing 1,348m² of new office and allied health floorspace, with around 70 new jobs created on-site. These jobs are in addition to the existing jobs associated with the warehouses located on the proposed Lot 1 that will be retained. The proposal will therefore have a positive impact on employment on the site. • The proposal incorporates a diverse mix of uses that strengthens the intent and vision of Frenchs Forest as it transitions into a Strategic Centre. The proposal is consistent with allowing the B7 Business Park to grow and mature in order to support the new hospital. • The proposal will contribute to other metropolitan strategic planning objectives relating to the provision of housing for an ageing population, co-location of aged housing and local health facilities and opportunities for older people to continue to live in the community.
Northern Beaches Community Strategic Plan	<ul style="list-style-type: none"> • Council states that the proposal is inconsistent with Goal 13 – <i>Our businesses are well-connected and thrive in an environment that supports innovation and economic growth.</i> • The proposal retains the existing employment uses within Lot 1 on-site and provides an additional 1,348m² of new office and commercial floorspace, creating approximately 70 new jobs on-site. • Furthermore, as noted above, the site's proximity to the hospital means that it is ideally placed for the proposed mix of uses. This area will logically transition to more diverse uses that complement and grow the health and education precinct, without impacting on

Strategic Document	Keylan Response
	<p>B7 zoned land to the south of Warringah Road which are not physically or functionally connected to the hospital and are therefore suitable for retention for employment purposes not associated with the hospital.</p> <ul style="list-style-type: none"> • The proposal retains the existing B7 Business Park zoning of the site and will increase the employment capacity of the site. • Furthermore, the proposal retains the existing industrial/warehouses uses within proposed Lot 1.

Attachment 2

**Analysis of surrounding B7 Business Park
prepared by
Keylan Consulting Pty Ltd**

Skyline Place – Analysis of surrounding B7 Business Park



1	Gym	6	Childcare Centre
2	Hotel + Bottle Shop (Approved for 100 bed Hotel)	7	Fast Food/Takeaway Food Premises
3	Food Markets	8	Television Station
4	Biotechnology company	9	100 bed Private Hospital
5	Medical Supply Store		

Attachment 3

**Economic Impact Assessment – Supplementary Advice
prepared by
HiIPDA**

14 December 2018

Dear George,

Subject: DA 2018/0995 – Proposed seniors housing at 1-5 Skyline Place Frenches Forest

I refer to your recent instructions to consider the report prepared by North Beaches Council to the Sydney North Planning Panel meeting of 18 December 2018 in relation to the above development application.

In particular, we have reviewed the comments made by council on the economic impact assessment report, on pages 11-14 of the report. We believe there are a number of matters in the report that need to be clarified in order for the Panel to appropriately understand our findings. Each of these matters is addressed below.

Overview

For clarity, we have restated the essential points of our argument below:

1. The site is an appropriate location for seniors housing because:
 - Locating seniors housing close to health facilities as well as a range of other amenities provides many benefits to seniors.
 - The proposed use is compatible with the adjoining employment related activities.
 - The location on the edge of the B7 zone will provide for an effective transition between low density residential uses and a range of other existing and future uses within the business park.
 - The proposed development is not financially feasible on residential land in Frenchs Forest due to the higher land value. The site provides for a viable development, in close proximity to the hospital with minimal impacts to the surrounds.
2. The proposed development is consistent with GSC's strategic plans for the area:
 - It is the clear intention of the Greater Sydney Region Plan and the North District Plan for Frenchs Forest to progress to a mixed use health education and innovation precinct.
 - The proposed development is consistent with the evolution of a health education precinct as outlined in the Greater Sydney Region Plan also noting that:
 - Business Parks, as an office park in the isolated landscape, have been in decline for some time (ABS job numbers show this shift)
 - The relatively low level of amenity within the Frenchs Forest business park is currently impacting on rents making most development unviable, unless related to health services and

accommodation because these business types will be prepared to pay a premium to be located close to the Northern Beaches Hospital

- Health education precincts look to an integration of as a multitude of uses and connectivity
- There needs to be critical mass and range of lifestyles in the precinct – staving off what can build this critical mass is contrary to current thinking around innovation precincts.

3. The proposed development will not compromise the employment potential of the business park because:

- There is currently ample floor space capacity to meet future demand
- There is potential for considerable further employment related development in the future
- The proposal will not establish a precedent for residential uses in the business park because the application is for seniors housing, which operates as an ongoing business unlike other residential development.
- It is likely, given the patterns of development that have occurred in other health education precincts, that the range of land uses in Frenchs Forest will transition to a mixed use precinct.

4. The proposed development will have a net positive impact on business growth and employment because:

- the development would be replacing one population servicing business and one commercial business with up to five businesses in the health and population serving industries, resulting in a net increase of three businesses.
- The proposed development will result in a net employment increase on the site of 55 jobs.

5. The proposed development will have a strong positive economic impact arising from:

- Construction works estimated at \$41 million
- Total economic activity generated by construction of \$132 million
- Direct and indirect construction employment equivalent to 357 job years
- Ongoing economic contributions once operational through:
 - The generation of 70 jobs (representing 55 additional jobs)
 - Remuneration onsite estimated at \$1.4 million
 - Industry value add from the development being in the order of \$5.2 million per year
 - Retail expenditure by workers of around \$240,000 per year.

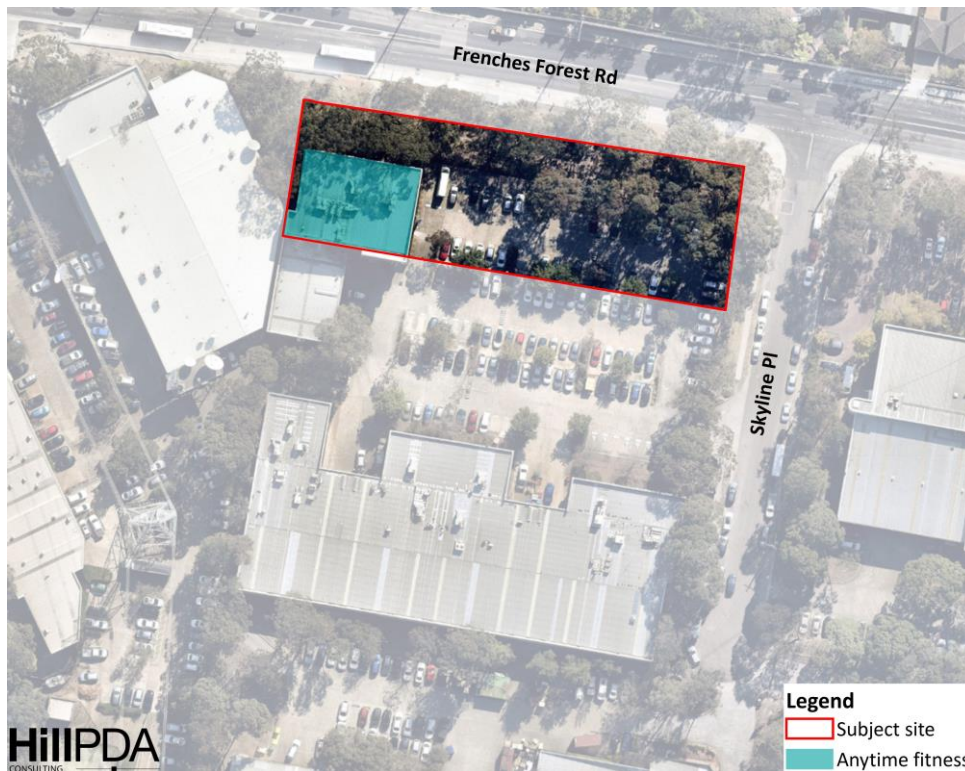
Specific matters

The specific comments by Council on the EIA, commencing on page 11 of their report to the Panel, are addressed below.

6. *The EIA does not identify the impact of loss of existing businesses on the site and the net economic benefit of the proposed aged care/retail jobs, compared to existing or potential jobs.*

The following figure shows the boundary of the proposed built works. The area affected by proposed built works is predominately comprised of a car park with a three storey building on the western boundary, known as Building E.

Figure 1: Location of proposed built works



Source: HillPDA

The proposal would result in the demolition of Building E. Building E is currently tenanted by a 24 hour gymnasium on the ground floor, with office uses above. The entire top floor of the building has been vacant for over 2 years, and approximately half of the floorspace on the second level of the building has been vacant for four years. This vacancy is largely due to the lack of lifts in the building, making the space unattractive when compared to other commercial space available in the area (Keylan Planning).

Except for the proposed demolition of Building E, the proposed development would not obstruct or result in the loss of any other commercial businesses already present in the wider 'Skyline Business Park.'

Employment estimates for Building E have been calculated based on current occupancy comprising the 24 hour gymnasium on the ground floor (~500sqm GFA), with approximately half of the floorspace on the second level of the building also being occupied by a commercial businesses (~250sqm GFA).

We have estimated that the gym generates around 5 jobs and commercial business generates around 10 jobs. As such, total employment currently on site has been estimated at around 15 employees¹. In comparison, the proposed development could yield around 70 jobs upon completion and full settlement.

Consequently, the proposed development is likely to result in a net increase of around 55 jobs over that currently provided on site. Furthermore, as the majority of the site is used as an at-grade car park the development would make more effective and efficient use of the site from an economic point of view.

¹ Gym employment estimated at around 100sqm per employee – employment can range between 1 per 50-100sqm GFA. given the unique offering that Anytime provides the higher range estimate was deemed appropriate – Commercial employment estimated at around one employee per 25sqm GFA

- 7. It also relies on a model of a mixed use innovation district as identified in the Greater Sydney Region Plan, which is not currently applicable to the Frenchs Forest Area*

The Greater Sydney Commissions' (GSC's) plans identify Frenchs Forest as a strategic centre and a health education precinct. Consistent with these plans, HillPDA has provided information in the EIA on how health education precincts evolve and eventually become innovation districts. The EIA is not reliant on this information.

- 8. Permitting a residential use in the Business Park may impact in the precincts progression to becoming an innovation district, which firstly requires a university and a significant research and development component*

The proposal is for seniors housing which is operated as a business unlike most other forms of residential accommodation. It will not provide a precedent for general residential development in the business park. The proposal will increase the mix of uses in the Frenchs Forest strategic centre, building on the strategic advantages created by the new hospital. The proposal will not jeopardise the growth of employment related activities in the centre (as outlined above).

While a university is helpful to establishing research and innovation functions, it is not considered to be essential, particularly in the early stages of evolution. It is noted that universities often co-locate with hospitals (e.g. University of Sydney's campus at Concord Hospital) and there is scope for this to occur at Northern Beaches Hospital in the future.

Regardless of the future mix of uses that develop within the area, the proposed development would play a complementary role and would be consistent with the North District Plan's vision for "a mix of complementary industry tenants, housing, ancillary facilities and services".

- 9. The EIA does not demonstrate a net job benefit*

This matter is addressed at item 6 above.

- 10. It is therefore not possible to assess the impact of the loss of existing jobs/businesses their economic value these currently provide. Further, it does not consider the loss potential for new jobs if the site was redeveloped for commercial or industrial uses, as permitted under the B7 zone.*

The proposed development will not result in a loss of jobs as it makes use of a currently unused parcel of land. The proposal will result in an increase in jobs. As to the suggestion that the proposed development will result in a lost opportunity for commercial and industrial development, it is noted that the site has been available for that purpose for a considerable time and not taken up for commercial or industrial uses.

Further, there is considerable capacity in the Frenchs Forest business park for commercial and industrial development and the proposed development will not impede the continued operation or future intensification of activity at the business park. The area between Warringah Road, Frenchs Forest Road East and the Wakehurst Parkway is around 158,200 sq m. Allowing for a one-third site coverage, 20 per cent of the area being used for roads and development to an average height of five storeys, the area has capacity for 167,000 sq m of GFA. The estimated existing GFA is around 58,000. Based on these assumptions, the business park has capacity for an additional 109,000 sq m GFA. At total capacity (based on the above assumptions and 80% of GFA for office and 20% of GFA for warehouse uses), the business park has capacity for around 8,500 jobs.

11. *Employment uses proposed through the redevelopment (aged care workers and associated commercial uses, such as hairdressers) are relatively low skilled/paid jobs, with an average salary of \$41,000 p.a. The types of jobs proposed do not match the aspirations of the professional resident workforce and offset the loss of existing jobs. In particular, 'Professional, Scientific and Technical services', which are currently identified in the EIA as the most common business type in the business park, is the largest source of employment for the Northern Beaches resident workforce (13% at 2016).*

IBIS world reports state that the average wage for workers within gyms and fitness centres across Australia in 2018/19 is around \$24,500 per annum while the average wage for Professional Services was \$68,367. These are below that of the average applied in the Economic Impact Assessment.

As of 2016, Northern Beaches LGA generated just over 88,230 jobs, with the industry of Professional, Scientific and Technical Services recording the second highest employment.

However, further assessment of employment industries at the ANZSIC 2 Digit level reveals that the industry of Sports and Recreation Activities (which best fits gym operations and employment) is the 23rd largest employment industry across the LGA at only 1.2% of all employment.

This is in contrast to the type of industries that could be accommodated on the site, these being:

- Other Store-Based Retailing - the 2nd largest employment generator (7.2% of all employment)
- Food Retailing- the 9th largest employment generator (3.2% of all employment)
- Personal and Other Services (contains hair dressing) – the 11th largest employment generator (2.6% of all employment)
- Residential Care Services –the 12th largest employment generator (2.6% of all employment).

As such, the type of end uses and industries that are suggested to be accommodated on the site are more consistent with the top employment industries across the LGA, when compared to what currently exists on site.

The proposal would also be generating more employment, in line with these high employment industries.

Table 1: Top 23 employment industries by ANZSIC 2 – digit code – Northern Beaches LGA 2016

1 Digit Level	2 Digit Level	Employment	% of total LGA employment
Retail Trade	Food and Beverage Services	6994	7.9%
Professional, Scientific & Technical Services	Professional, Scientific and Technical Services*	6354	7.2%
Retail Trade	Other Store-Based Retailing	6155	7.0%
Education and Training	Preschool and School Education	5673	6.4%
Construction	Construction Services	4674	5.3%
Other Services	Inadequately described	3875	4.4%
Health Care and Social Assistance	Medical and Other Health Care Services	3739	4.2%
Health Care and Social Assistance	Social Assistance Services	3393	3.8%
Retail Trade	Food Retailing	3232	3.7%
Construction	Building Construction	2520	2.9%
Other Services	Personal and Other Services	2306	2.6%
Health Care and Social Assistance	Residential Care Services	2258	2.6%
Professional, Scientific & Technical Services	Computer System Design and Related Services	2059	2.3%
Public Administration & Safety	Public Administration	1966	2.2%

1 Digit Level	2 Digit Level	Employment	% of total LGA employment
Health Care and Social Assistance	Hospitals	1891	2.1%
Financial and Insurance Services	Property Operators and Real Estate Services	1655	1.9%
Wholesale Trade	Machinery and Equipment Wholesaling	1627	1.8%
Other Services	Repair and Maintenance	1576	1.8%
Wholesale Trade	Other Goods Wholesaling	1570	1.8%
Education and Training	Adult, Community and Other Education	1517	1.7%
Administrative & Support Services	Building Cleaning, Pest Control and Other Support Services	1467	1.7%
Administrative & Support Services	Administrative Services	1287	1.5%
Arts and Recreation Services	Sports and Recreation Activities	1048	1.2%

Source: ABS 2016 *(except Computer System Design and Related Services)

The suggestion by Council that Frenchs Forest business park should target professional and service workers is supported in the main. However, a broad range of jobs should be supported in any business park to meet local demand, including demand from workers in the area. Successful business parks typically offer a broad range of jobs that form a business community.

For example, Norwest business park (which is zoned B7) accommodates over 20,000 employees and is planning to expand to 35,000 employees. The business park has a wide range of space available accommodating companies such as Woolworths, Resmed, BBraun, Inchcape (Subaru) and Capital Finance, and a plethora of small and medium businesses. It is also home to the Hills Private Hospital and Hospital for Specialist Surgery, and notably seniors housing has also been approved for development within the business park. The Hills Shire has among the highest proportion of businesses between three to four people and this is reflected by the amount of quality office space available between 50–150m² in Norwest. Norwest business park has grown into a full service, self-sufficient area, which includes:

- Post office / Banks (business and retail)
- Restaurants / Bars and Cafes
- Childcare Centres
- Gyms / Drycleaners
- Two shopping centres incorporating both a Woolworths and Coles supermarket.
- Recreational Lakes / Walking and Bicycle tracks.

The proposed development will assist Frenchs Forest business park to offer a broader range of employment opportunities, which is consistent with the development of business parks in general.

In addition, the proposed development is likely to attract allied health care workers and other health professionals to the area, which will contribute to employment growth in the health sector arising from the new hospital development. Collectively, the demand for health related industries and professionals to locate in the area could revitalise the business park, leading to employment growth across a range of industries including health professionals.

12. Furthermore, the 'productivity of the proposed jobs (contribution to economy), as identified in the EIA, are relatively low. Industry Value Add (IVA) per worker is identified as \$87,357 for aged care and \$63,999 for general retail/commercial. However, for the wholesale sector on the Northern Beaches the IVA is significantly higher at \$226,791 per worker and for Manufacturing and Professional Scientific and Technical

it is \$132,747 and \$145,501 per worker (source: economi.id). Therefore, existing jobs in the Skyline Business Park are likely to currently have a significantly higher contribution to the economy, than those proposed.

It is noted that the broad industries described above have higher rates of IVA per worker when compared to those proposed. As discussed previously, the site currently does not generate employment associated with the majority of industries highlighted by Council.

Current employment on the site includes professional services, which employees an estimated 10 persons (\$145,501 IVA/worker) and 5 jobs within the industry of arts and recreation services (\$58,810 per worker) or more specific that within the sports and recreation activities industry (\$67,649 per worker)².

This equates to around \$1.75 million to \$1.79million in IVA currently being generated on site.

That is around \$3.40 million to \$3.44 million less than that estimated to be contributed by the proposed industries in the EIA report (at \$5.19 million).

13. The short-term job creation from construction of the proposed development included in the EIA, again are not shown to have offset the loss of existing jobs.

If we assume a two year construction period, 45 jobs per annum would be generated by development. Including multiplier effects, this is estimated to increase to a total of 179 jobs per annum.

Upon completion, around 70 jobs are estimated to be generated and accommodated on site.

This is significantly higher, over that period, than the 15 jobs estimated to be currently generated on site. Post construction, 70 jobs could potentially be generated an increase of around 55 jobs over that currently generated onsite.

14. The analysis of the change in business numbers is significantly wider than the business park area (Frenches Forest-Belrose SA2) and may include number of businesses, Belrose Business Park as well as home-based business. It is therefore difficult to apply this trend data to just the Frenchs Forest business park.

Noted, however statistical area level 2 (SA2s) are the smallest geographical boundary that the ABS provide business count data.

Specifically, the development would be replacing one population servicing business and one commercial business with up to five businesses in the health and population serving industries, resulting in a net increase of three businesses.

15. The introduction of a residential land use to this zone would impact the future commercial and industrial activities that can take place in this Business Park zone (including office, research and development, manufacturing and warehouse).

The current absence of residential land use is a key differentiator for this employment land precinct from others in the region. Removing this point of difference would impact the attractiveness of this business park to prospective businesses and undermines its ability to cater for a diversity of business types, affecting the resilience of the Northern Beaches economy.

² Economy id 2016/17 worker productivity for Northern Beaches LGA

Any future industrial and commercial developments and activities within this zone would have to consider impacts to the amenity of this proposed residential population. Noise concerns could impact hours of operation and truck movements for nearby businesses.

In some situations proximity of residential uses to certain industrial employment can present land use conflicts, particularly in relation to noise and odour generating industrial activity. It is noted that there are no such uses present in the business park or in the vicinity of the proposed development. These types of uses are unlikely to be attracted to the business park given its current makeup and the strong likelihood of the business park attracting health related activities now that the Northern Beaches Hospital is in operation. As to the suggestion that the proposed development will create the potential for land use conflicts, it is noted that the business park currently accommodates a range of uses, some of which will be equally as sensitive to neighbouring uses. For example, the Kindalin early childhood learning centre and Greenwood child care are within the business park and are likely to be equally sensitive to the surrounding land uses. Such uses have not impacted the current or future commercial and industrial activities taking place in this business park zone.

At the 2016 Census, the business park was found to already accommodate uses associated with health care and social assistance as follows:

- The industry grouping of Health Care and Social Assistance accounted for around 550 jobs or 9.5% of all employment, making it the fourth largest employment industry within the precinct
- The precinct contained just over 20 jobs within the industries of Residential Care Services; Aged Care Residential Services; and Other Residential Care Services³.

It is also noteworthy that low density residential is located immediately to the north of the business park across Frenchs Forest Road and this has co-existed with the operation of the business park for a long time.

16. The application is inconsistent with the broader metropolitan planning for Sydney and strategic direction for Frenchs Forest. The inconsistency primarily relates to the seniors housing component, which is considered a residential form. The broader strategic planning direction is to retain and manage higher order economic activity areas which contribute to the economic functioning of Greater Sydney. This application does not meet this direction and will have implications on the gradual loss of urban services found in the Frenchs Forest business park.

The broader metropolitan planning for Frenchs Forest is set out in the Greater Sydney Regional Plan and North District Plan which is addressed in Section 3.1 of the EIA report. These documents identify Frenchs Forest, as an emerging health and education precinct. The plans outline a vision for health and education precincts as innovation districts that are:

*“Transit-accessible precincts centred around health and education assets, surrounded by a network of medical research institutions, a mix of complementary industry tenants, **housing**, ancillary facilities and services⁴.” (our emphasis)*

The proposed development is consistent with the direction of the plans.

17. The EIA assumes that the Frenchs Forest precinct will progress to a 'mixed-use innovation precinct', as set out in the Region Plan. It relies on the definition in the Region Plan of innovation districts as mixed-use precincts, as a basis for allowing residential uses in the business park: 'Transit-accessible precincts centred

³ 2016 ABS Table Builder – Destination Zone Place of Work, employment at ANZSIC 4 Digit code

⁴ Ibid., p

around health and education assets surrounded by a network of medical research institutions, a mix of complementary industry tenants, housing, ancillary facilities and services'.

It is the clear intention of the Greater Sydney plan and the North District plan for Frenchs Forest to progress to a mixed use innovation precinct. A sample of reference from the North District Plan follow as evidence of this.

- On page 8 : “Frenchs Forest is an emerging strategic centre focused on growing jobs around the Northern Beaches Hospital”
- Page 21 : Frenchs Forest health and education precinct and Planned Precinct, which will bring together Northern Beaches Council, UrbanGrowth NSW Development Corporation, NSW Health, NSW Department of Education, Transport for NSW and NSW Roads and Maritime Services and other State agencies to grow jobs, housing and infrastructure within the precinct.
- Page 39: Additional capacity for housing supply is well progressed across much of the District. Current State-led initiatives include:..... Frenchs Forest Planned Precinct
- Page 54: Intensification of health and education facilities and ancillary businesses will occur at Macquarie Park, Frenchs Forest (to support the Northern Beaches Hospital) and St Leonards, which have all been identified as health and education precincts
- Page 66: The new hospital and improved transport links will be a catalyst for revitalisation of the area and the creation of a vibrant town centre with new homes and jobs
- Page 66: Action 35 is to *Strengthen Frenchs Forest through approaches that: a. leverage the investment in the Northern Beaches Hospital to provide a vibrant and well-connected strategic centre b. deliver an urban core with a mix of commercial and residential uses, open space and community facilities c. provide new housing, including affordable housing d. encourage walkability and cycling within the precinct e. enhance the natural setting of the area by embellishing existing open space f. attract new, innovative health and medical related commercial premises to support the hospital g. reinforce the centre as an employment hub for the Northern Beaches, building on the existing business park east of the Wakehurst Parkway.*

There can be no question that the intended future for Frenchs Forest is as stated in the EIA.

18. *The EIA (p25) claims that the current B7 zoning is not consistent with evolution of a 'traditional business park' to a modern innovation district, by not permitting residential. However, based on the Region Plan model, the residential development comes at latter phases of the 'maturity pathway for health and education precincts' (Phase 6 'diversification').*

Frenchs Forest is identified in the North District Plan in being at the 'Cluster' stage (phase 1 university). However, a pre-requisite for this stage is a University, it is ambitious to say Frenchs Forest is progressed to even that stage of the innovation district model. The North District Plan also notes that it is not expected that all (health and education) precinct should, or will be able to, develop into a mixed-use innovation

Indeed, loss of key sites in the business park to residential development (which could have the potential to accommodate research and educational facilities) could potentially impact Frenchs Forest's ability to progress further along the innovation district maturity pathway.

We can see no such claim on page 25 of the EIA.

That the Frenchs Forest is at the cluster stage of evolution into a health education precinct is no reason for not permitting a broader range of uses. Such an approach can only hamper the long term development of the strategic centre and frustrate the implementation of the Northern District Plan. As to the suggestion that a university is required, there is no reference to the need for a university in Frenchs Forest in any of the strategic planning documents. Frenchs Forest already has education uses including primary and high schools. There is

also the potential for university facilities to seek to co-locate with the North Beaches Hospital in the future as addressed above.

As noted earlier, there is significant capacity in the Frenchs Forest business park and the proposed development will not undermine the employment strengths of the Frenchs Forest Strategic Centre. In relation to potential future uses, the proposed development will be compatible with the wide mix of uses anticipated, and in this regard the proposal is totally consistent with the strategic vision articulated in the North District Plan.

Conclusion

Having considered the various matters raised by Council, HillPDA stands by and reaffirms the conclusions reached in the EIA.

Yours sincerely,

Signed by



.....
Martin Hill

Director

M.Real Estate (UNSW), M.Property Development (UTS), BSc (Hons), Certified Practicing Valuer (Unrestricted), FAPI, MRICS

Martin.Hill@hillpda.com

Attachment 4

**Supplementary Advice
prepared by
One Fell Swoop & Oak Tree Group**

Platino Properties



Retirement living project – 5 Skyline Place Frenchs Forest NSW

Multi-level and vertical retirement villages are an emerging and contemporary accommodation trend occurring within Australian capital cities. This multi-level trend has been underway for a number of years in US, UK & NZ and Australia is now adopting this asset class.

In Australia, during the past 3-5 years, the retirement sector has seen an escalation in multi-level apartment villages by not-for-profit and for-profit seniors living owner/operators. According to the 2018 PwC/Property Council Retirement Census, “13% of retirement villages in Australia are vertical and almost 30% of new developments are vertical or combination.” We expect the percentages of vertical village forms to rise significantly in the next 5-10 years.

The multi-level retirement apartment trend is being driven by a combination of factors including changing consumer preferences for apartment style living, shortage and cost of developable land in urban locations with close proximity to transport, hospitals, medical and wellbeing services and a need for connectedness to combat loneliness. It is noted that many of the multi-level village developments under consideration are being constructed as co-located health and wellbeing precincts.

Projections conducted by the Australian Institute of Health and Welfare indicate that people aged 75+ will also contribute to a bigger proportion among the 65+ cohort. Interestingly, it is projected that by 2046 there will be an increase in the population percentages of 75-84 and 85+ age groups, with a reduction in percentages of 65-74 aged group. This is due to the cohort of Baby boomers moving through the system.

The details are as follows:

Composition of Australian population aged 65+

Year	65-74	75-84	85+
2016	57%	30%	13%
2046	45%	35%	19%

Source: Australian Institute of Health and Welfare (2017). *Older Australia at a glance*. Australian Government.

* N.B. Numbers in year 2046 do not add up to 100% because they are rounded numbers.

The life expectancy of people aged 65 in 2030 is projected to be more than 20 years, as illustrated below:

Life expectancy (years)

Year	Men			Women		
	At birth	65	85	At birth	65	85
2013-15	80.4	19.5	6.2	84.5	22.3	7.2
2030	>83	>20	No data	>87	>23	No data

Source: Australian Institute of Health and Welfare (2017). *Older Australia at a glance*. Australian Government.

Kontis, V et al. (2017). *Future life expectancy in 35 industrialised countries: projections with a Bayesian model ensemble*. *Lancet*, 389: 1323- 35. Online – [http://dx.doi.org/10.1016/S0140-6736\(16\)32381-9](http://dx.doi.org/10.1016/S0140-6736(16)32381-9)



Compression of morbidity

Interrelated with the extension of life expectancy is the contribution of healthier lifestyles to the compression of morbidity. As Fries, Bruce and Chakravarty have demonstrated, *“the age of onset of chronic illness may be postponed more than the age at death, squeezing most of the morbidity in life into a shorter period with less lifetime disability.”*¹

As a follow-on then, *“seniors with healthier lifestyles will live longer yet have less cumulative lifetime disability than those with less healthy lifestyles.”*¹

In the context of the retirement living model, there will be an increasing cohort of older, healthier seniors seeking health and wellness lifestyle accommodation options extended into their later years.

Target market

The average age of resident entry into retirement living accommodation is 75 years, with the average age of people living in villages, 81 years. Significantly, 62% of village residents are female which is an age cohort looking for community connectivity to reduce loneliness, has a growing need for assistance with daily living and care services as they age, and rely on each other for support and friendship.

Vertical retirement village exemplars

Vertical retirement living projects on the east coast demonstrate the scope of new vertical developments:

- Aveo Bella Vista NSW
- Harbord Diggers Freshwater NSW
- The Royce Penrith NSW
- Australian Unity Lane Cove NSW
- Australian Unity South Melbourne Vic
- Lendlease GTV9 Richmond Vic
- Aveo Newstead Brisbane Qld
- Oak Tree Brisbane Qld

¹ Fries, J.F et al. (2011). Compression of morbidity 1980-2011: A focused review of paradigms and progress. Journal of Aging Research. Online - <https://www.hindawi.com/journals/jar/2011/261702/>



Aveo 'Bella Vista' NSW



Tulich Group 'The Royce' Penrith NSW



Australian Unity 'Lane Cove' NSW



Australian Unity ‘The Grace’ South Melbourne VIC



Aveo ‘Newstead’ QLD





All the projects referred above are built on a premise of a close, socialised and activated communities where residents are encouraged to participate in wellness and allied health programs that increases the quality of life, extends longevity and reduces health service costs.

Apartment configurations

Resident focus group evaluation and direct experience in marketing and sales of retirement living accommodation provides express opinion of purchaser 'wants' when entering retirement living. Specifically, while residents may be downsizing from a larger family home, they all want large living spaces and preferably a minimum of 2-3 bedrooms and 2-bathrooms. There is an expectation that additional bedrooms offer opportunities for grandchildren and/or other family members to stay over and, in many cases, a second bedroom to provide separate 'partner' bedroom space in cases of ill-health, sleep apnea or insomnia.

Our sales experience indicates that where 1-bedroom apartments are provided in seniors living, they are the last to sell as there is limited market demand.

The recommended product mix guideline advice we provide to clients for vertical retirement developments, based on consumer demand is:

- 1 bedroom 5%-10% in the range of 70-80 sqm
- 2 bedroom 35%-45% in the range of 90-100 sqm
- 2.5 bedroom 30%-40% in the range of 95-110 sqm
- 3 bedroom 10%-15% in the range of 120+ sqm

We note the Skyline Place project 78-apartment schedule comprises of:

- 35 x 2-bedroom
- 43 x 2 bedroom + study
- 2-bedroom apartments range in size from 98-103sqm
- 2-bedroom + study range in size from 110-154sqm

In our opinion, the product mix proposed in the Skyline Place project is consistent with resident demand, is sustainable and will meet consumer expectation.

Apartment yield

The project yield of 78 apartments is, in our opinion, at the lower end of retirement village operating viability. Typically, retirement village optimum operating efficiency is considered in the range of 80-120 units or 60-80 units when co-located with other forms of senior accommodation. Efficiency in numbers is measured from a position of financial sustainability and optimisation of an activated community and resident connectedness.

In our opinion, a project of 78 apartments in a prime market location offering mid to high end product range will be operational viable, however, any further reduction in yield is not recommended.

Daily living needs

The Skyline Place Road project is proposed as a retirement village development designed specifically to offer apartment 'accessibility' that will allow residents to age-in-place. In many



cases, residents entering a retirement village will be totally independent, have high levels of mobility and require low levels of assistance to maintain daily activities, if any. As the residents age and have increasing levels of frailty, the residents will be less independent and require growing levels of assistance. The 2016 ABS Census indicated the percentage of older persons in the community that have a need for assistance with daily living are:

- 16% of population 75-79 years
- 26.4% of population 80-84 years
- 46.8% of population 85+

The Skyline Place project will provide for an efficient and economical delivery of daily support into a dedicated 'accessible' ageing community.

Economics

Retirement living is an established form of accommodation and service in Australia with approximately 6% of the 65+ National population living in retirement villages (approximately 180,000 residents). Retirement village deliver the community a high quality lifestyle and downsizing opportunity, freeing up many larger family homes in the immediate area and the opportunity for people to 'cash up' residual equity in the family home. The Skyline Place project community economic value will encompass:

- Release of up to 60-70 family homes in the immediate area (80% of persons entering retirement living will move within 5km-10km of the location, with a maximum drive time of 30-minutes)
- Reduces the cost drag on GP and hospital health services²
- Assist in meeting Northern Beaches Council areas growing demand for seniors housing accommodation
- Generate employment in areas of care and nursing services, hospitality and allied health and wellbeing amenities

² Built Environment Informatics & Innovation Research Centre, University of Technology Sydney, (2017). A comparison of retirement village living with general residential. <http://www.retirementliving.org.au/wp-content/uploads/2013/12/COMBINED-REPORT-6-Oct-2017.pdf> - viewed 4 December 2018.



Community

The activation and success of each retirement community relies on horizontal connectivity. Opportunities for resident social interaction are enhanced through living in levels of horizontal communities with the community members offering each other support, advice and friendship².

As reported by the Retirement Living Council, “*villages offer many opportunities for residents to interact, without living in each other’s pocket, through on-site recreational facilities, community meeting centres and social activities*”³⁴. This interaction provides a buffer against social isolation and loneliness – a major health issue for older people living in the community. Without horizontal social connectivity, the residents in the community will be more likely to experience isolation and loneliness and the associated negative health outcomes, increased mortality and reduced quality of life⁵⁶⁷.

The proposed Skyline Place project is, in our opinion, consistent with the design principles of a connected community and will assist with providing connectiveness that will reduce the incidence of loneliness and isolation.

Bruce Message
Partner & Strategy Director
0412 616 120

³ Hemingway, A., & Jack, E. (2013). Reducing social isolation and promoting well being in older people, *Quality in Ageing and Older Adults*, 14(1), 25 -35, <https://doi.org/10.1108/14717791311311085> - viewed 4 December 2018.

⁴ Retirement Living Council (2013). Australia’s ageing population and the role of retirement villages. <http://www.retirementliving.org.au/wp-content/uploads/2013/12/Retirement-Villages-and-the-Ageing-Population.pdf> - viewed 4 December 2018.

⁵ Aged & Community Services Australia (2015). Social isolation and loneliness among older Australians. <https://www.acsa.asn.au/getattachment/Publications-Submissions/Social-Isolation-and-Loneliness/1015-Social-Isolation-and-Loneliness-Paper.pdf.aspx?lang=en-AU> - viewed 4 December 2018

⁶ Gardner, C., Geldenhuys, G., & Gott, M. (2018). Interventions to reduce social isolation and loneliness among older people: an integrative review. *Health and Social Care in the Community*, 26(2), 147-157, <https://onlinelibrary.wiley.com/doi/pdf/10.1111/hsc.12367> - viewed 4 December 2018.

⁷ UCL Institute of Health Equity, (2015). Reducing social isolation across the lifecourse, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/461120/3a_Social_isolation-Full-revised.pdf - viewed 4 December 2018.

From: Leonardo "Len" Torti <len@oaktreegroup.com.au>

Sent: Thursday, 29 November 2018 11:35 AM

To: George Revay <george@platino.com.au>

Subject: RE: French Forest

George,

I have read through the Council report and SEPP 65 and I agree that it is onerous for the yield per floor. Its constraints are not conducive to a retirement community sense of belonging for the residents to be divided into enclaves which would mitigate the likely "meeting in the corridor" (which also could be likened to the village street where passers-by might interact). Retirement Villages and in particular vertical developments would encourage the interaction of likeminded residents who might not necessarily be direct neighbours. The lobby is a focal point and it reduce the chance meeting if the lift lobbies were detached from one another by distance let alone a physical structure.

The reduction in quality of life could be compromised especially during holiday periods when most residents might be away to family functions and the remaining few would be alone. Loneliness is one of the most difficult problems to approach for retirees and it is very important to promote friendship, fellowship and interaction even if it is only that passing conversation in the corridor. If the traffic is reduced as per SEPP 65 it is likely that the interaction will be reduced accordingly. The reduction is not parallel but exacerbated by the reduction.

E.g. if there is 16 apartments per floor there is likely to be only 24 residents. If it were reduced to 8 it would be 12 residents.

During certain period let's just say that 50% of the residents were away. The likelihood is that the singles are left behind because couples go together. That 50% would be say 8 apartments but it's also more likely to be only 8 residents. In the 8 apartment scenario we would be looking at only 4 residents. The likelihood of chance meeting in the corridor is greatly reduced and could cause the space to become empty of the warm encountered even by the atmosphere of people moving or other conversation. This promotes extreme loneliness and leads to increased mental stress.

Ultimately this part SEPP 65 is actually a problem for retirees. Please refer to Aged and Community Services Australia " Social Isolation and Loneliness Among Older Australians Issues paper No1 October 2015 <https://www.acsa.asn.au/getattachment/Publications-Submissions/Social-Isolation-and-Loneliness/1015-Social-Isolation-and-Loneliness-Paper.pdf.aspx?lang=en-AU>

Regards



Leonardo (Len) Torti

GROUP PROPERTY ACQUISITIONS

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Attachment 5

**Building Frontage Measurements
prepared by
Keylan Consulting Pty Ltd**



KEYLAN
consulting pty ltd

Suite 2, Level 1
1 Rialto Lane
Manly NSW 2095

Skyline Place – Building Frontage Measurements

Note: measurements are approximate.



Attachment 6

**Assessment against ADG and Seniors SEPP
prepared by
Keylan Consulting Pty Ltd**

Keylan's Response to Council's ADG and Seniors SEPP assessments

ADG Assessment

ADG criteria	Council comments	SEE (Appendix 10)	Comment
Part 3 Siting the development			
3A Site analysis	<ul style="list-style-type: none"> Not Consistent A context plan is provided to accompany the application. The building form does not reflect the current character as anticipated by the WLEP 2011 for the site. 	<ul style="list-style-type: none"> Consistent A site analysis has been prepared. 	<ul style="list-style-type: none"> Consistent A site analysis was prepared for the proposal in accordance with the ADG. Council's comment regarding the built form is not relevant in the assessment of this criteria, but to other provisions of the ADG (addressed below). Also, it is noted in Council's assessment report on p. 27 that a site analysis plan was submitted with the application and satisfactorily complies with the site analysis requirements of Cl 30 Site Analysis of the Seniors SEPP. Council's assessment is therefore contradictory.
3B Orientation	<ul style="list-style-type: none"> Not Consistent The proposal does not activate the street, particularly French Forest Road East, as the proposal includes residential units on the ground level. 	<ul style="list-style-type: none"> Consistent The proposed building is oriented to the north and overshadowing to the south is minimized due to building separation. 	<ul style="list-style-type: none"> Consistent Given the substantial level difference at the front of the site and the substantial landscaped setback, it is difficult to directly the Frenchs Forest Rd frontage. However, the proposed building faces the road and includes direct

ADG criteria	Council comments	SEE (Appendix 10)	Comment
			access from the basement carpark to the footpath along Frenchs Forest Road. It also includes a café fronting Frenchs Forest Rd and Skyline PI which provides activation.
3C Public domain interface	<ul style="list-style-type: none"> • Not Consistent • The development has been found to be inconsistent in the development does not transition well. 	<ul style="list-style-type: none"> • Consistent • Private balconies overlook areas of public domain and will provide for surveillance. • Planting is proposed against the exposed wall of the basement carpark to minimise its visual impact. 	<ul style="list-style-type: none"> • Consistent • The proposal is consistent as it provides a landscaped buffer in the front setback, direct access to Frenchs Forest Road from the basement carpark and passive surveillance of public domain areas from above private balconies. • The upper level balconies and windows will overlook the public domain.
3D Communal and public open space	<ul style="list-style-type: none"> • Not Consistent • The proposed development provides 600m² (13% of the site area) as communal open space within the ground and roof level of the development. The communal open space located on the ground is located on the southern side of the proposed building, and will not receive adequate solar access. • Accordingly, the development is found to be inconsistent with this requirement of the guide. 	<ul style="list-style-type: none"> • Communal open space located at Ground floor and Roof level. • An additional 1302m² of internal communal space is provided and considered more usable for seniors than outdoor recreation space. 	<ul style="list-style-type: none"> • Consistent • The proposal provides a total of approx. 2720m² of communal open space, comprising both outdoor and internal common areas. This equates to 57% of the site area. • Outdoor open space areas include the north facing landscaped area, community garden and the rooftop terrace. • Expert architectural advice from Sue Kenny (Attachment 7) notes that internal communal space is considered more usable for seniors than outdoor recreation space.
3E Deep soil zones	<ul style="list-style-type: none"> • Consistent 	<ul style="list-style-type: none"> • Consistent 	<ul style="list-style-type: none"> • Consistent

ADG criteria	Council comments	SEE (Appendix 10)	Comment
	<ul style="list-style-type: none"> A total of 1417m² (30.7% of the site area) is deep soil zone. 	<ul style="list-style-type: none"> Deep soil area is approx. 1420m² or 30.7% of site area and is more than the min 15% required and is located where it allows retention of existing significant trees. 	
3F Visual privacy	<ul style="list-style-type: none"> Not Consistent The proposed provides 6m setback to the southern and western boundaries. The conflicting use adjacent to the proposed development increases the amenity requirements for residential abutting the Commercial Strata Offices. Minimum ADG Requirements should be met. 	<ul style="list-style-type: none"> Consistent Up to 4 storeys - distances of windows from boundaries is a minimum of 6m (to the Eastern and Western boundaries). The proposed building will have adequate separation from neighbouring sites. Not Consistent Up to 5-8 storeys - windows to habitable rooms are a minimum of 8.4 m, achieving required separation to boundaries where there are non-habitable rooms and achieving marginally less than the 9m required for habitable rooms. Two balconies per level will also be at a distance of 6m from boundaries. 	<ul style="list-style-type: none"> The proposal is consistent up to 4 storeys. Levels 5-8 are not consistent with the ADG 9 m separation distance, however these levels are above the roof height of the adjacent building at 79 Frenchs Forest Road. Therefore, there will be no direct lines of sight between the proposed building and the existing building to the west, resulting in satisfactory visual privacy.
3G Pedestrian access and entries	<ul style="list-style-type: none"> Consistent The development provides level pedestrian access to all floor levels from the basement car parking area. 	<ul style="list-style-type: none"> Consistent Building entries are located to be clearly identifiable. 	<ul style="list-style-type: none"> Consistent
3H Vehicle access	<ul style="list-style-type: none"> Consistent The proposed vehicular access has been assessed by Council's Traffic Engineer who has raised no objections to the proposal in terms of the location of the vehicular access. 	<ul style="list-style-type: none"> Consistent The car park entry has been located on Skyline Place, being a secondary street frontage. The entry is located behind the building line and security doors are proposed. 	<ul style="list-style-type: none"> Consistent
3J Bicycle and car parking	<ul style="list-style-type: none"> Consistent An assessment of car parking provision, having regard to SEPP (HSPD) 2004 and location of the site has been undertaken. 	<ul style="list-style-type: none"> Consistent Car parking provision complies with the relevant controls. Parking for the commercial space is compliant with Council's DCP. Parking for the seniors 	<ul style="list-style-type: none"> Consistent

ADG criteria	Council comments	SEE (Appendix 10)	Comment
	<ul style="list-style-type: none"> In summary, the amount of car parking is sufficient for the development, as addressed elsewhere in this report. 	<ul style="list-style-type: none"> apartments is compliant with the SEPP Seniors Living. Visitor spaces are provided in accordance with eth DCP rates. Bicycles can be stored within the basement car park. A bicycle rack could also be provided near the building entrance should this be required. 	
Part 4 Designing the Building			
4A Solar and daylight access	<ul style="list-style-type: none"> Not Consistent 79% of the apartments will receive the required solar access, However, 21% of the units will receive no solar access between 9am and 3pm in midwinter. 	<ul style="list-style-type: none"> Consistent Required solar access is achieved in 79% of apartments. 21% of units that receive no solar access between 9am and 3pm at midwinter. 	<ul style="list-style-type: none"> The proposal exceeds the minimum 70% of apartments receiving a minimum of 2 hours of direct sunlight, providing direct sunlight to 79% of units. However, 21% of apartments receive no direct sunlight between 9am and 3pm at mid winter. This is a minor departure from the maximum 15% requirement. Although inconsistent with the maximum requirement, these units greatly exceed the minimum unit size recommendations and have access to a high quality communal open space. These units also benefit from an attractive outlook to the south Therefore, this inconsistency is justified, as it is a minor departure from the maximum requirement and the proposal significantly exceeds the minimum requirement of apartments receiving direct sunlight. We note that the revised scheme prepared by PA Studio (Attachment 8) includes the

ADG criteria	Council comments	SEE (Appendix 10)	Comment
			removal of some south facing units, which reduces the exceedance of the maximum requirement from 21% to 19%, which provides an even smaller departure from the ADG.
4B Natural ventilation	<ul style="list-style-type: none"> Not Consistent 58 % of the units are naturally cross ventilated, which does not comply with the 60% requirement. 	<ul style="list-style-type: none"> Not Consistent 45 out of 78 units are naturally ventilated, achieving 58% of total units. Units that are not naturally ventilated are: <ul style="list-style-type: none"> Ground Floor: 5x Unit type A Level 1: 4x Unit type A Levels 2-5: 4x Unit type A, 2x Unit type A2 	<ul style="list-style-type: none"> 58% of the units are naturally cross ventilated. The variance from the ADG achieves marginally less than the 60% required. Expert architectural advice prepared by Sue Kenny (Attachment 7) states that this is considered to be acceptable, given the specific design and functional needs of housing for seniors. Also, all units comprise balconies and openable windows within primary living areas and bedrooms. Accordingly, the level of non-compliance is negligible and the intent of the ADG is achieved.
4C Ceiling heights	<ul style="list-style-type: none"> Consistent The floor to ceiling heights of the apartments within the development meet the minimum 2.7m as required by the ADG. 	<ul style="list-style-type: none"> Consistent 2.7m ceiling heights are provided in all habitable rooms. 	<ul style="list-style-type: none"> Consistent
4D Apartment size and layout	<ul style="list-style-type: none"> Consistent The minimum size of all 2 bedroom units is 98m² 	<ul style="list-style-type: none"> Consistent The minimum size of all 2 bedroom units is 98m² 	<ul style="list-style-type: none"> Consistent
4E Private open space and balconies	<ul style="list-style-type: none"> Not Consistent The private open space of all 2 bedroom units has a minimum size of 10m² and minimum depth of 2.5m. 	<ul style="list-style-type: none"> Consistent The private open space of all 2 bedroom units have a minimum size of 10m² and minimum depth of 2.5m. Not Consistent 	<ul style="list-style-type: none"> We note that the proposal is not consistent with the private open space requirements for 3 bedroom units identified in the ADG.

ADG criteria	Council comments	SEE (Appendix 10)	Comment
	<ul style="list-style-type: none"> The private open space of 2 bedroom + study units (i.e. 3 bedroom units) are 10m² and minimum depth of 2.5m, which is noncompliant with this requirement in relation 21 of those units. The private open space for the remaining 2 bedroom + study units have a minimum size of 14m² and minimum depth of 2.8m. 	<ul style="list-style-type: none"> The private open space of 2 bedroom + study units (type A1, type N and Type O) are 10m² and minimum depth of 2.5m. Although this is non-compliant with the ADG minimum sizes for POS, it exceeds the minimum size POS stipulated under Cl 50 (f) (ii) of the Seniors SEPP. There are 21 of those units. Consistent The private open space of 2 bedroom + study units (type B, type P, type Q, type R and type S) have a minimum size of 14 m² and minimum depth of 2.8m. 	<ul style="list-style-type: none"> However, the proposed private open space is consistent with Cl 50 of the Seniors SEPP, which states that private open space for in-fill self-care housing cannot be used to refuse development consent if there is a balcony with an area of not less than 10 m² (or 6 m² for a 1 bedroom dwelling), that is not less than 2 m in either length or depth and that is accessible from a living area. The Seniors SEPP provides smaller space requirements as it is associated with the specialised use of a seniors development. The ADG has been prepared for a range of residential accommodation and household sizes and it is not appropriate to be strictly applied to seniors housing where the requirements of the Seniors SEPP are met and acceptable resident amenity outcomes are achieved. The proposed balconies are appropriately sized, functional and can accommodate suitable outdoor furniture. As such, the intent of the ADG to provide appropriately sized private open space is achieved.
4F Common circulation and spaces	<ul style="list-style-type: none"> Not Consistent The maximum number of apartments off a circulation core on a single level ranges from 10 to 16 units, which exceeds the requirement of this control. 	<ul style="list-style-type: none"> Not Consistent The maximum number of apartments off a circulation core is 10. The amenity of those circulation areas are enhanced with windows that allow sunlight and natural ventilation, as 	<ul style="list-style-type: none"> The maximum number of apartments proposed off the circulation core is 14. This is inconsistent with the ADG requirement.

ADG criteria	Council comments	SEE (Appendix 10)	Comment
		<p>well as seating and greater than minimum corridor widths (between 1.8-2m wide).</p>	<ul style="list-style-type: none"> • The circulation core comprises two lifts. • The proposed corridors are greater than 12m in length, however they are articulated with common areas and varied apartment layouts creating a staggered form. • The ADG recognises the importance of common circulation and spaces, providing opportunities for casual social interaction among residents and assisting with social recognition. • Opportunities for social interaction is of high importance in a seniors development as it combats social isolation and loneliness. • Expert architectural advice prepared by Sue Kenny (Attachment 7) states that the proposed length of the corridors and number of apartments on a single level is appropriate as it increases the opportunities for incidental/chance meetings and interactions amongst senior residents. • Also, a single corridor with a greater number of units would result in a better outcome as it provides ease of access for care-providers and increases the opportunities for incidental social interaction between seniors. • It is critical that all units have fully enclosed, secure and easy access to two lifts. Seniors developments

ADG criteria	Council comments	SEE (Appendix 10)	Comment
			<p>cannot function efficiently if each level is catered by only one lift.</p> <ul style="list-style-type: none"> • There is the opportunity for greater articulation of the corridors and circulation space. as shown in the revised scheme prepared by PA Studio (Attachment 8). • This includes a recessed zone in from the corridor for each apartment and includes different architectural/interior design treatments for each apartment entry, as well as resting bays halfway along the corridors. • Such design refinements could be conditioned.
4G Storage	<ul style="list-style-type: none"> • Consistent (subject to condition) • The proposed building includes resident storage areas for all units within the building and as well as within the basement levels. • A condition of consent could be recommended, if the application was recommended for approval to ensure the proposed storage areas are allocated in accordance with the size requirements of the ADG for the respective units. 	<ul style="list-style-type: none"> • Consistent • At least 8m³ of storage is provided to all 2 bedroom units and at least 10m³ of storage is provided to 2 bedroom + study units. 	<ul style="list-style-type: none"> • Consistent
4H Acoustic privacy	<ul style="list-style-type: none"> • Consistent (subject to condition) • An acoustic assessment has been submitted which considers both internal and external noise sources including surrounding traffic noise, noise emissions associated with traffic generated by activities on site. The acoustic assessment found that 	<ul style="list-style-type: none"> • Consistent • The proposed building is well separated from the surrounding buildings. The landscaped buffer between Frenchs Forest Road East and the proposed building, as well as the setback from the road, will minimise the impact of road noise on 	<ul style="list-style-type: none"> • Consistent

ADG criteria	Council comments	SEE (Appendix 10)	Comment
	noise generated by the development will comply with all relevant standards.	residents. Appropriate insulation will be provided to party walls and services and mechanical equipment will be located away from bedrooms.	
4J Noise and pollution	<ul style="list-style-type: none"> • Not Consistent • The noise and pollution impact of the development is unsatisfactory given the site location within the Business Park. 	<ul style="list-style-type: none"> • Consistent • A large setback is provided from Frenchs Forest Road to minimise the impacts of road noise on future residents. The building is also well separated from any of the existing buildings in the surrounding area. • A substantial landscape buffer is provided between Frenchs Forest Road and the building which will act as a sound buffer and also act to filter air pollution. 	<ul style="list-style-type: none"> • An acoustic report was prepared by Wood and Grieve Engineers and submitted with the SEE. • The report found that the light industrial uses operating on-site do not generate significant noise throughout the day, evening and night. • The report undertook noise modelling from the residential properties opposite the site on Frenchs Forest Road to obtain the worst case existing noise scenario. • The proposal is located at the boundary of the B7 Business Park, with an interface to a low density residential area to the north. The building is oriented away and from surrounding uses in the business park, with extensive separation distances. • The business zone is characterised by a mix of non-industrial uses such as child care centres. The mixed use nature of the zone is reinforced by recent approvals for a private hospital and a 100 room hotel. • The B7 zone contemplates and can accommodate a range of uses, which can co-exist without adverse amenity impacts.

ADG criteria	Council comments	SEE (Appendix 10)	Comment
4K Apartment mix	<ul style="list-style-type: none"> • Not Consistent • The development only provides two bedroom units and 2 bedroom plus study. There is a lack of variety in types of units offered in the development. • A variation of 1, 2 and 3 bedroom apartments should be provided across the development. 	<ul style="list-style-type: none"> • Consistent • A variety of apartment sizes and styles are proposed. The mix proposed is based on consideration of the current market demands for seniors housing. 	<ul style="list-style-type: none"> • The development proposes 78 x 2 bedroom units, based on consideration of the current market demands for seniors housing. • 43 x 2 bedroom units have studies. • The units are proposed in a variety of sizes and styles. • The development is solely for seniors living, and therefore a range of apartment types and sizes to cater for different household types, as recommended in the ADG, is considered inappropriate. • Expert architectural advice provided by both Sue Kenny (Attachment 7) and One Fell Swoop (Attachment 4) notes that 2 bedroom units are appropriate for a seniors development. One bedroom units are less desirable and make the proposal less feasible.
4L Ground floor apartments	<ul style="list-style-type: none"> • No assessment provided 	<ul style="list-style-type: none"> • No assessment provided 	<ul style="list-style-type: none"> • No assessment provided
4M Facades	<ul style="list-style-type: none"> • Not Consistent • The development is not respectful of the surrounding character, therefore the façade treatment is not considered to be appropriate to enhance the streetscape and character of the area. 	<ul style="list-style-type: none"> • Consistent • The design of the proportion, articulation and facade elements ensure the front and side facades are visually interesting. 	<ul style="list-style-type: none"> • The proposal incorporates a high level of articulation on the façade, including a (6x6.5m) break in the central part of the northern façade to modulate the perceived bulk of the building. • High quality materials and finishes have been incorporated into the façade design. • A generous landscaped setback has been proposed to screen the

ADG criteria	Council comments	SEE (Appendix 10)	Comment
			appearance of the building when viewed from Frenchs Forest Road. <ul style="list-style-type: none"> The proposal is considered to comply with Provision 4M.
4N Roof design	<ul style="list-style-type: none"> Consistent The roof space is used for open space for the residents 	<ul style="list-style-type: none"> Consistent Communal open space is proposed on the rooftop of the building to provide for passive recreation for residents and guests. This space will have a high level of amenity, with good solar access and views to the north. The rooftop will incorporate a garden area which will enhance amenity and sustainability. 	<ul style="list-style-type: none"> Consistent
4O Landscape design	<ul style="list-style-type: none"> Not Consistent Landscape plans have been submitted with the application, providing detailed plans for the landscape treatment. The landscape plans have been assessed by Council's Landscape Officer, who has found that the landscaping does not respond appropriately to the site or its context. 	<ul style="list-style-type: none"> Consistent The landscape design proposed for the areas immediately surrounding the building will ensure that the existing leafy streetscape is maintained. As many of the existing mature trees as possible will be retained and a considerable amount of new planting will be provided. All species are consistent with Council's preferred species list. Landscaping will ensure that shade is provided and the microclimate will be enhanced. Community gardens are also proposed to provide not only for areas of respite and passive recreation but also to provide for an opportunity for 	<ul style="list-style-type: none"> The proposal incorporates extensive deep soil planting and is accompanied with an Arboricultural Impact Appraisal which supports the proposal. The Warringah Development Control Plan requires that sites in the front and rear setbacks provide for deep soil landscaped areas. The proposal meets the objectives of the WDCP requirement for the provision of landscaped areas. The proposal also exceeds the ADG recommended deep soil zone guide.

ADG criteria	Council comments	SEE (Appendix 10)	Comment
		residents and workers to be involved with garden maintenance.	<ul style="list-style-type: none"> The landscape design is considered viable and sustainable. The proposal is considered compliant. Under the revised scheme (Attachment 8), the community garden is relocated the community garden to the West of the building where it will receive Northern Solar access.
4P Planting on structures	<ul style="list-style-type: none"> Not Consistent Refer to Principle 5 above and Landscape referral comments. 	<ul style="list-style-type: none"> No assessment provided 	<ul style="list-style-type: none"> Council's comment of inconsistency isn't explained or justified.
4Q Universal design	<ul style="list-style-type: none"> No assessment provided 	<ul style="list-style-type: none"> Consistent The design of the apartments is in accordance with the requirements of the SEPP Seniors Living, which has specific requirements regarding adaptability. 	<ul style="list-style-type: none"> Consistent
4R Adaptive uses	<ul style="list-style-type: none"> No assessment provided 	<ul style="list-style-type: none"> No assessment provided 	<ul style="list-style-type: none"> No assessment provided
4S Mixed use	<ul style="list-style-type: none"> No assessment provided 	<ul style="list-style-type: none"> Consistent The proposed development is for a mixed use building that incorporates non-residential uses at the ground and first floors. Ground floor uses have separate entries which will serve to activate the street front. Separate entries are proposed for the residential component of the building and all entrances are directly accessible from the street. 	<ul style="list-style-type: none"> Consistent
4T Awnings and signage	<ul style="list-style-type: none"> Not Applicable The DA does not propose any awning or signage and as such, this clause is not considered in the assessment of this application. 	<ul style="list-style-type: none"> Consistent Continuous awnings, with appropriate lighting, are provided along the frontage of the building to ensure that 	<ul style="list-style-type: none"> It is agreed that any signage will be subject to a separate development application.

ADG criteria	Council comments	SEE (Appendix 10)	Comment
	<ul style="list-style-type: none"> It is noted that the commercial premises located on the ground floor of the development will require signage in the future, and this will be subject to future development applications or be exempt development under the provision of State Environmental Planning Policy(Exempt and Complying Development Codes) 2008. 	<p>protection from the weather is provided.</p>	
4U Energy efficiency	<ul style="list-style-type: none"> Consistent A BASIX certificate report has been prepared for the development. The BASIX certificate confirms that required targets for water, thermal comfort and energy efficiency will be met. 	<ul style="list-style-type: none"> Consistent All apartments will receive a good level of natural light and natural ventilation. Apartments will be fitted with energy-efficient fittings and appliances. 	<ul style="list-style-type: none"> Consistent
4V Water management and conservation	<ul style="list-style-type: none"> Consistent Water management and conservation through the means of retention of stormwater for reuse has been assessed as compliant and further, compliance with the supplied BASIX Certificate can be conditioned, if the application was recommended for approval. 	<ul style="list-style-type: none"> Consistent All apartments will be fitted with water efficient fittings and appliances. 	<ul style="list-style-type: none"> Consistent
4W Waste management	<ul style="list-style-type: none"> Consistent Subject to condition 	<ul style="list-style-type: none"> Consistent Adequate areas for the storage of rubbish and recycling bins will be located within the ground floor of the building to allow for easy collection. Residential waste will be separated from that of the commercial uses. 	<ul style="list-style-type: none"> Consistent
4X Building maintenance	<ul style="list-style-type: none"> Consistent The application includes a Schedule of Materials and Finishes which ensures 	<ul style="list-style-type: none"> Consistent The proposed building has been designed to ensure that ongoing maintenance is minimized. 	<ul style="list-style-type: none"> Consistent

ADG criteria	Council comments	SEE (Appendix 10)	Comment
	the longevity and sustainability of the building.		

Seniors SEPP Assessment

2 Aims of Policy	<ul style="list-style-type: none"> Not consistent <p>The proposed development is consistent with the first two aims of the policy, in that the proposed development will increase the supply and the versity of residences that meet the needs of seniors or people with a disability.</p> <p>The proposed development also makes efficient use of existing infrastructure and services, in that the site is serviced by existing public transport and is located within 400m of the nearest bus stop.</p> <p>The last aim of the development must be considered in context with other provisions of the SEPP (HSPD). The aim of the policy is to encourage seniors housing to be of a good design outcome which maintains and minimises the impacts on the amenity and character of the area. The proposed built form and the location of the site does not minimise the impact on the character of the area as detailed later in this report.</p> <p>Accordingly, the proposed development has been found to be inconsistent with the aims of this policy and this issue has been included as a reason for refusal.</p>	<p>Section 6.3.1 of the SEE:</p> <p>It incorporates high quality design which responds to both the existing and emerging character of the locality and provides appropriate amenity and accessibility for future residents.</p>	<p>The proposal is entirely consistent with the aims of the Seniors SEPP, including 1(c) <i>be of good design</i>.</p> <p>The design of the proposal has been assessed against the Seniors SEPP and the ADG.</p> <p>The proposal is considered to be of good design, through the provision of high amenity and high quality architectural design.</p> <p>The impact of the building on the amenity and character of the area is also reduced through the provision of a densely landscaped setback to Frenchs Forest Road.</p> <p>The revised scheme (Attachment 8) incorporates further architectural design which staggers the height and bulk of the proposal and incorporates more articulation of the built form. These revisions could be addressed through amended plans or conditions.</p>
4 Land to which Policy Applies	<ul style="list-style-type: none"> Consistent 	The proposal is permissible pursuant to the Seniors SEPP.	The proposal is permissible pursuant to the Seniors SEPP.

	<p>The site is zoned B7 Business Park under the provisions of the WLEP 2011. The proposed development is permissible under the SEPP (HSPD) by virtue of 'hospitals' are being permitted in the B7 Business Park zone.</p> <p>Council obtained legal advice in relation to whether the B7 Business Park zone is "primarily for urban purposes", as residential developments are prohibited within this zone.</p> <p>The legal advice confirmed that based on the objectives of the zone and the nominated (and innominate) permissible uses, it is apparent that the B7 Business Park zone is primarily for urban purposes, that is "pertaining to or constituting a city or town" which is consistent with the decision of the Land and Environment Court in <u>Modog Pty Ltd v Baulkham Hills Shire Council (2000) 109 LGERA 443 at 448</u>.</p> <p>Further to the above, the legal advice has also confirmed that the B7 Business Park zone is not zoned for industrial purposes, therefore Clause 4(6)(b) of SEPP (HSPD) 2004 is not applicable to the proposed development.</p> <p>Therefore, the Seniors Housing is permitted within the B7 zone.</p>		
19 Use of seniors housing in commercial zones	<ul style="list-style-type: none"> • Not consistent • The site is zoned B7 Business Park and accordingly is zoned primarily for 	<ul style="list-style-type: none"> • The street address and entry to the building will be from the proposed new road off Skyline Place. This road 	<ul style="list-style-type: none"> • The intent of this clause is to provide street level activation in commercial zones. As outlined in

	<p>commercial purposes. The proposed development includes residential units on the ground floor level fronting Frenchs Forest East, therefore the proposed development is inconsistent with the requirement of this Clause and this issue has been included as a reason for refusal.</p>	<p>will provide for pedestrian access and will also allow for vehicular drop-off within a porte cochere.</p> <ul style="list-style-type: none"> There is a considerable ground level difference across the site, primarily between Frenchs Forest Road and the northern side of the proposed building. This results in a sloped embankment along the northern frontage of the site. As a result of this level difference, the ground level of the proposed building (so called because this level provides ground level access to the building from the proposed new road) is approximately 2.65m above ground level at the Frenchs Forest Road frontage. The frontage to Frenchs Forest Road in effect comprises the lower ground basement car park. The residential component begins at 2.65m above the ground level, as shown on the northern elevation plan. 	<p>the SEE, it is difficult to achieve activation of the Frenchs Forest Road frontage due to the level differences across the site and requirement for a landscaped setback.</p> <ul style="list-style-type: none"> However, a level of activation is still achieved through the direct access from the car park to the street and the café fronting Frenchs Forest Road and Skyline Place. Furthermore, the proposed development complies with the intent of this provision as it provides commercial/business uses at ground level fronting the new internal road thereby activating the street frontage of the building.
Part 2 Site-related requirements			
26 Location and access to facilities	<ul style="list-style-type: none"> Consistent <p>The subject site has satisfactory access to:</p> <ol style="list-style-type: none"> Shops, banks and other retail and commercial services that residents may reasonably require, and Community services and recreation facilities, and The practice of a general medical practitioner. <p>The site is not located within 400 metres of all the essential facilities and services.</p>	<p>Appendix 6 of SEE:</p> <p>The residents of the proposed development will have access to shops, bank service providers and other retail and commercial services and a general medical practitioner at Forestway Shopping Centre via the bus service along Frenchs Forest Road including route 280.</p> <p>Small scale retail/cafes and commercial services will be provided within the subject site and within the future Frenchs Forest Town Centre.</p>	<ul style="list-style-type: none"> Consistent

	<p>However, the site is located within 400 metres of a public transport service.</p> <p>Bus services are located within the 400m walking distance from the site on Frenchs Forest East which travels to Forestway Shopping Centre, Warringah Mall, Manly, and Chatswood.</p>	<p>Community services and recreation facilities can also be access via local bus services and provide access Warringah Aquatic Centre and Jindabyne Reserve.</p> <p>The site will be easily accessible to the new Northern Beaches Hospital, when it opens in late 2018, and to a wide range of shops, facilities and services in the Town Centre as development is undertaken in accordance with the Northern Beaches Hospital Precinct Structure Plan.</p> <p>The Traffic and Parking Assessment Report prepared by Varga Traffic Planning Pty Ltd states several bus routes which operate within approximately 400m walking distance of the site along Frenchs Forest Road east.</p> <p>Route 136 – Chatswood to Manly Route 169 – Manly and Wynyard Route 280 – Chatswood and Warringah Mall.</p> <p>To access Forestway Shopping Centre residents could use bus route 280, the closest bus stop is located within 150m walking distance north of the site on Frenchs Forest Road. The bus stop is accessed via a sealed pedestrian footpath.</p> <p>Bus route 280 will take residents to the bus stop opposite Forestway Shopping Centre which is a maximum walking distance of 350m away.</p>	
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27 Bush fire prone land	<ul style="list-style-type: none"> Consistent <p>The Application was referred to the NSW RFS for comments. The NSW RFS has raised no objection to the proposed development subject to conditions.</p>	<p>Appendix 6 of SEE:</p> <p>The site is identified as comprising a Vegetation Buffer located on the south west corner of the lot. Once the site is subdivided, a minor portion of Lot 2 comprising the seniors development, will contain the bushfire buffer.</p> <p>As discussed in Section 6 of the SEE, the proposal is accompanied with a Bushfire Protection Assessment Report which confirms the proposal can comply with Planning for Bushfire Protection 2006.</p>	<ul style="list-style-type: none"> Consistent
28 Water and sewer	<ul style="list-style-type: none"> Consistent <p>Reticulated water and sewerage infrastructure is presently available to the site. The seniors housing is able to be connected to a reticulated water system,</p>	<p>Appendix 6 of SEE:</p> <p>The proposal will be connected to reticulated water and sewer.</p>	<ul style="list-style-type: none"> Consistent

	in accordance with the provisions of Clause 28.		
29 Consent authority to consider certain site compatibility criteria for development applications to which clause 24 does not apply	<ul style="list-style-type: none"> Not Consistent <p>The proposed development is found to be inconsistent with the requirement of Clause 25 (5) (i) & (v) for the following reasons:</p> <p>(i) <i>the natural environment (including known significant environmental values, resources or hazards) and the existing uses and approved uses of land in the vicinity of the proposed development.</i></p> <p><u>Comment:</u> The subject site's location in a business park has the potential to impact the amenity of future residents, with regards to noise concerns, hours of operation and truck movements for nearby businesses, which can occur at various hours of the night.</p> <p>Therefore, the proposed use (being seniors living) is inconsistent with the permissible and approved land uses within the vicinity of the site.</p> <p>(v) without limiting any other criteria, the impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the development.</p>	<p>Appendix 6 of the SEE:</p> <p>Clause 24 does not apply to the proposal, because a site compatibility certificate is not required.</p> <p>The proposal is consistent with Clause 25 5(b) (i) (iii) and (iv). The SEE considers the existing environment, hazards and site suitability and access to services and facilities. The assessment finds the site is suitable for seniors development.</p> <p>The land is not zoned open space or special uses.</p> <p>A Market Report prepared by One Fell Swoop accompanies this SEE and identifies there is a clear unmet supply and demand gap in the current market for seniors housing within the Northern Beaches catchment. This unmet supply and demand gap will continue to widen given the ageing demographic trend of the population. The Report identifies that by 2026 there is an expected accommodation shortfall of up to 1,318 dwellings.</p> <p>The Report identifies the proposed 78 seniors living units will assist to meet a portion of the unmet demand identified in the Northern Beaches catchment. The report identifies 75% of buyers will currently live within 8-10km of the site, enabling residents to stay within their</p>	<ul style="list-style-type: none"> The proposal is considered to be consistent with the permissible and approved land uses within the vicinity of the site. The built form is discussed in the table above, which finds the site to be consistent with the intent of the ADG, whilst being designed to satisfy operational requirements of a seniors housing development. Additionally, an acoustic report was prepared by Wood and Grieve Engineers and submitted with the SEE. The report found that the light industrial uses operating on-site do not generate significant noise throughout the day, evening and night. The report undertook noise modelling from the residential properties opposite the site on Frenchs Forest Road to obtain the worst case existing noise scenario. The proposal is located at the boundary of the B7 Business Park, with an interface to a low density residential area to the north. The building is oriented away and from surrounding uses in the business park, with extensive separation distances. The business zone is characterised by a mix of non-industrial uses such as child care

	<p>Comment: This issue is discussed in detail in the various section of this report, where it is found that the bulk and scale, built form and character of the proposed development is found to be inconsistent with the character of the area.</p> <p>This issue has been included as reason for refusal.</p>	<p>communities and close to their support networks. The site is suitably located to benefit from the close proximity to transport, shops and a range of services. The site is conveniently located within 200m of the new Northern Beaches Hospital precinct and the proposed town centre providing housing close to health services and ancillary services, critical to the needs of the ageing community.</p> <p>The Report finds the development design and specific components forming the current application for seniors accommodation have been validated by One Fell Swoop as being appropriate for the site and Frenchs Forest catchment. The Market Assessment Report is provided in Appendix 3.</p>	<p>centres. The mixed use nature of the zone is reinforced by recent approvals for a private hospital and a 100 room hotel. The B7 zone contemplates and can accommodate a range of uses, which can co-exist without adverse amenity impacts.</p>
Part 3 Design Requirements			
30 Site Analysis	<ul style="list-style-type: none"> Consistent <p>A site analysis plan and Statement of Environmental Effects submitted with the application satisfactorily address the requirements of this clause.</p>	<p>Appendix 6 of the SEE:</p> <p>The architectural package, site analysis plans, design verification statement and SEE provides a detailed consideration of the site and the design response to the site. The SEE details how the proposed design has regard to the design principles in Division 2 and include visual and acoustic privacy, solar access and accessibility.</p>	<ul style="list-style-type: none"> Consistent
31 Design of in-fill self-care housing	<ul style="list-style-type: none"> Not consistent <p>Pursuant to Clause 31 in determining a development application to carry out development for the purpose of <u>in-fill self-care housing</u>, a consent authority must take into consideration the provisions of</p>	<p>All relevant Design Principles the Seniors SEPP (which are called up in the guidelines) addressed</p>	<p>We note that Council acknowledges the Guidelines were prepared with low scale developments in mind i.e. 8m high developments. Accordingly, the design principles must be applied as relevant to the nature of the</p>

	<p>the <i>Seniors Living Policy: Urban Design Guidelines for Infill Development</i> published by the former NSW Department of Infrastructure, Planning and Natural Resources dated March 2004.</p> <p>It is noted that the Seniors Living Policy is geared towards low scale development located in residential zones. The key principles of the policy have been reviewed and the proposed development is not considered to enhance internal site amenity and respond appropriately to its context for the reasons stipulated within following sections of this report.</p>		<p>development proposed, in this case a multi-level seniors living development.</p> <p>All relevant design principles in the SEPP (referenced in the Guideline) have been addressed and this demonstrates an acceptable design and built form character.</p>
33 Neighbourhood amenity and streetscape	<ul style="list-style-type: none"> Not consistent <p>Clause 33 requires that an assessment of the desirable elements of the current character of the area be undertaken.</p> <p>The introduction of residential land uses in the form of seniors housing in this zone will impact the future commercial and industrial activities that are permissible within the B7 Business Park zone.</p> <p>The proposed land use and scale of the development is not consistent with the location's current or future character of the site.</p> <p>The proposed development will significantly alter the surrounding context which is commercial and industries in nature, and adjoining built form to the north comprising a low-scale, low density</p>	<p>Appendix 6 of the SEE:</p> <p>The proposal has been designed to be consistent with the desired future character of the precinct, providing a high quality development which provides commercial/retail opportunities to activate the site and precinct.</p> <p>The proposal is consistent with the rapidly changing character of the Northern Beaches Hospital Precinct and surrounding area as it will provide for a range of uses that will be complementary to the new Hospital and to the health precinct. The provision of seniors housing will also be consistent with the changes in the area as it will provide for a type of housing that is currently is short supply and will be under increasing demand as the population in the area ages.</p>	<p>Built form is discussed in Section 7.1 of the SEE and in the ADG table above.</p> <p>The proposal has considered the location's current and future character.</p> <p>The proposal is considered to comply with CI 33 as the proposal will contribute to the character of the area.</p> <p>The proposal will maintain reasonable neighbourhood amenity, and provides a sufficient landscaped setback from Frenchs Forest Road.</p> <p>The proposed building height is compatible in scale with adjacent development, including the Northern Beaches Hospital, Tilley Lane private</p>

	<p>suburban residential character dominated by canopy trees and landscape.</p> <p>The proposed development is therefore found to be inconsistent with the requirement of Clause 33. The reasons for this are further detailed in the context of this report, including these contained in Urban Design referral comments, an assessment against the objectives of the B7 zone and the assessment under SEPP 65, which relates to the context, built form and scale of the proposed development.</p>	<p>The does not comprise nor is it within close proximity to any heritage items. The proposal will contribute to a high level of residential amenity as demonstrated in the SEPP 65 and ADG assessment accompanied with this proposal.</p> <p>Adequate setbacks from the road and from surrounding uses / buildings are provided to reduce bulk and privacy concerns. Overshadowing impacts are minimised due to the siting of the proposal and mature trees are retained where feasible. The proposal responds to the desired future character of the area.</p>	<p>hospital and recently approved Parkway Hotel.</p>
34 Visual and acoustic privacy	<ul style="list-style-type: none"> Not consistent <p>The visual and acoustic privacy of the development is found to be unacceptable due to the subject site's location is a business park that has the potential to impact the amenity of future residential.</p> <p>Acoustic concerns, hours of operation and truck movements for nearby businesses which can occur at various hours might have not been adequately considered by the proposed development.</p>	<p>Appendix 6 of the SEE:</p> <p>The proposal will contribute to a high level of residential amenity with regards to visual and acoustic privacy as demonstrated in the SEPP 65 and ADG assessment accompanied with this proposal.</p>	<p>The proposal has considered the visual and acoustic privacy of neighbours in the vicinity and residents.</p> <p>An acoustic report was prepared by Wood and Grieve Engineers and submitted with the SEE.</p> <p>The report found that the light industrial uses operating on-site do not generate significant noise throughout the day, evening and night.</p> <p>The report undertook noise modelling from the residential properties opposite the site on Frenchs Forest Road to obtain the worst case existing noise scenario.</p> <p>The acoustic report considered the worst case scenario to predict the noise impacts of the proposal on the</p>

			<p>nearest sensitive receivers including residential properties to the north of the site across Frenchs Forest Road.</p> <p>The acoustic report considers the nearby residential properties will not be adversely affected through the operation of the proposed development, given the background level of noise generated from Frenchs Forest Road. Noise mitigation measures will be further considered at the design development stage to ensure compliance at the nearest sensitive noise receivers is achieved.</p>
35 Solar access and design for climate	<ul style="list-style-type: none"> Consistent <p>The application is supported by shadows diagrams which demonstrate that the development is capable of complying with the requirements of this control.</p> <p>Refer to comments under SEPP 65 compliance for solar access.</p>	<p>Appendix 6 of the SEE:</p> <p>The proposal achieves a high level of residential amenity with regard to solar access to private open spaces.</p>	<ul style="list-style-type: none"> Consistent
36 Stormwater	<ul style="list-style-type: none"> Not consistent <p>Council's Development Engineers have reviewed the proposal and have not supported the stormwater design in its current form due to insufficient information being submitted with the application.</p>	<p>Appendix 6 of the SEE:</p> <p>The proposal incorporates minimal impervious surfaces within proposed Lot 2. The proposal incorporates extensive landscaping within the front and rear setbacks.</p>	<p>Supplementary engineering advice has been provided which confirms the issues raised by Council can be addressed at the detailed engineering design stage, which would be completed prior to the issue of a Construction Certificate. These matters can be addressed through conditions.</p>
37 Crime prevention	<ul style="list-style-type: none"> Consistent <p>The arrangement and configuration of building is satisfactory in achieving adequate casual surveillance through the</p>	<p>Appendix 6 of the SEE:</p> <p>The proposed development has been designed to create a safe environment for residents in accordance with the four key</p>	<ul style="list-style-type: none"> Consistent

	<p>appropriate placement of balconies and windows and pedestrian access within the development and to adjoining streets.</p> <p>The proposal is satisfactory with regard to this design quality principle.</p>	<p>CPTED principles. The proposed incorporates the following measures:</p> <ul style="list-style-type: none"> • café fronting both Frenchs Forest and Skyline Place and the commercial spaces at ground level that will activate the street frontage • living areas and private open spaces fronting Frenchs Forest Road and the proposed internal road (off Skyline Place) • communal open spaces fronting Frenchs Forest Road that will provide for passive surveillance of the footpath and landscaped area below • secure entry into the building via the internal lobby and basement car park • concierge desk lighting around the entries into the building and of public areas adjoining the building • landscaping to distinguish public and private spaces 	
38 Accessibility	<ul style="list-style-type: none"> • Consistent <p>The proposed development requires a series of ramped paths due to the topography.</p> <p>The application is supported by an Access Report prepared Code Performance and dated 14 May 2018.</p> <p>The report concludes that based on the endorsement of the recommendations within report, the development is capable of complying with this clause.</p>	<p>Appendix 6 of the SEE:</p> <p>The proposal incorporates safe and obvious pedestrian links from the site to public transport services and convenient access to parking for residents and their visitors.</p>	<ul style="list-style-type: none"> • Consistent
39 Waste Management	<ul style="list-style-type: none"> • Consistent 	<p>Appendix 6 of the SEE:</p>	<ul style="list-style-type: none"> • Consistent

	Consistent subject to conditions	The proposal incorporates storage for recycling and waste materials available via a chute system from each residential floor.	
Part 4 Development standards to be complied with			
40 Development standards – minimum sizes and building height	<ul style="list-style-type: none"> Consistent <p>The proposal is compliant with site size and site frontage.</p> <p>The requirement of Clause 40(4) which relates to Building Height is not applicable to the subject site, as the subject is not zoned for residential development.</p>	<p>Appendix 6 of the SEE:</p> <p>Proposed Lot 2 has a site area of at least 1,000m² and a site frontage of at least 20m. There is no height limit for the site.</p>	<ul style="list-style-type: none"> Consistent
41 Standards for hostels and self-contained dwellings	<p>Clause 41 prescribes various standards concerning accessibility and useability having regard to relevant Australian Standards. The applicant has submitted a report and checklist prepared by an accredited access consultant verifying that the proposal will comply with the relevant standards. These standards may be reinforced via suitable conditions of consent, should the application be worthy of approval.</p>	<p>Appendix 6 of the SEE:</p> <p>The assessment indicates the proposal is consistent with Schedule 3.</p>	<ul style="list-style-type: none"> Consistent
Part 7 Development standards that cannot be used as ground to refuse consent			
50 Standards that cannot be used to refuse development consent for self-contained dwellings	<ul style="list-style-type: none"> Not consistent <p>Council found that building height, density and scale and solar access to not comply.</p>	<p>Appendix 6 of the SEE:</p> <p>Height: There is no height control which applies to the site. However, the proposed height is suitable for the site.</p> <p>Density: There is no FSR for the site however the proposed FSR is appropriate for the site and in the context of the surrounding buildings.</p>	<p>Council has misunderstood the implementation of CI 50 and seeks to apply these standards as development standards that must be complied with, rather than standards that cannot be used as grounds to refuse consent.</p> <p>Furthermore, these standards are generic standards which apply to the full range of seniors living typologies. Clearly, they would not be relevant to all seniors typologies and therefore do</p>

		<p>The proposal provides 30% of the Lot 2 site area as landscaped area, with 31% of the site being provided as deep soil planting area. The proposal is therefore consistent with the landscaping provisions of the SEPP.</p> <p>The proposal achieves adequate solar access as detailed in the SEPP 65 and ADG assessment. A variation to solar access is sought as 21% of units receive no direct solar access between 9am and 3pm in midwinter. However while these non-compliant apartments have a southerly aspect, they will be afforded pleasant outlook and distant views. The proposed development also incorporates a number of indoor and outdoor communal areas that will provide high levels of solar access and amenity for residents, and these areas are intended to supplement the private open spaces.</p> <p>All units have a minimum balcony areas of at least 10m² with a minimum dimension of 2.5m and are accessible from the living area.</p> <p>Carparking for the seniors component of the development has been provided in accordance with the requirements of the SEPP. The car parking for the commercial/business areas on the site have been provided in compliance with Council's DCP. This matter is discussed within Section 7 of the SEE.</p>	<p>not apply in the manner that Council has interpreted them.</p>
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Attachment 7

**Supplementary Advice
prepared by
Sue Kenny**

SKYLINE SENIORS

Review and comment as requested by George Revay – Platino Properties

Brief

This report responds to the documents listed below:

- Architectural Drawings submitted with DA 2018/0995
- Northern Beaches Council – Urban Design Referral Response

Single or separate buildings?

The Urban Design Referral Response suggests breaking the building down into 4 or 5 separate blocks. This would be neither practical nor operationally viable for a seniors' living development heading into the future. It is important that ALL units have fully enclosed, secure and easy access to two lifts, such that when one fails or needs to undergo maintenance, there is ALWAYS at least one operational lift.

This reasonably suggests a single building on the site. As well as maintaining accessibility for all residents, the current and future direction of aged care must be considered and allowed for.

Under the current Aged Care Road Map released in 2016, consumer-directed care has been introduced, providing individuals who have been assessed to gain Commonwealth care subsidies for care in the home the right to choose and tailor the care that they receive in their own home, or apartment. The prevalence of care in the home is increasing, and will eventually be structured so that care-providers can provide full high-care services to some-one in their own home, given the right built environment. Care-providers will need ease of access into and throughout apartment complexes to provide better and more cost-effective care options for residents. A single building with all units directly connected, will meet this criteria far better than a number of separate buildings. Seniors buying into such complexes will want to know that they will be able to age in place, and not have to relocate when their care needs become greater.

Additionally, the number of apartments in any stand-alone seniors living development must reach a certain number for the development to be financially viable operationally, and to offer aging-in-place and the necessary and desired community facilities.

Length of corridors

The length of corridors, and number of apartments on a single level has been identified as an issue. It is important that there are as many opportunities for social interaction as possible for elderly residents, to assist in avoiding social isolation and loneliness. A greater number of apartments on a single level increases the opportunities for incidental / chance meetings and interactions. With mobility an issue for most residents, resting bays will be introduced into the corridors, which will also assist in the visual articulation.

Cross ventilation

Non-compliance with cross ventilation has been raised. It is noteworthy, however, that the non-compliance is minor, with 56.4% of all apartments having some cross-ventilation opportunity. Given the specific design and functional needs of housing for seniors, this is considered to be acceptable.

Address: **PO Box 321 • Gladesville • NSW • 1675** Mob: **0419 297 490** Email: **sue@skarchitect.com.au**

• Brief Development • Design • Concept Planning and Fitout Feasibilities • SeniorsLiving Design Review & Advisory Services •
• Projects and Processes • Building Contracts • Management • Navigating the Legislative Framework • Technical Design Advice •
NOMINATED ARCHITECT: Susan Kenny REGN.NO: 5791 ABN: 60 460 404 122

Corridor articulation

As well as the seating bays previously mentioned, at each apartment entry, a sense of identity will be given to each apartment with a recessed zone in from the corridor, and a different architectural / interior design treatment to each entry, at the same time providing an opportunity to put down shopping bags or a handbag whilst looking for a key. The recesses also assist with the transition between semi-private and private space. Additionally, and as indicated in the ADG as appropriate, the corridors on each level open up to a common area on the north face for seating and gathering, with opportunities there for both solar access and natural ventilation into the common circulation space. Corridors are also wider than required, and will include areas of greater than minimum ceiling heights.

Access

We note the Access Report states that all areas of Schedule 3 of SEPP Seniors CAN be met as the design is developed, and concur with that.

Community

Community spaces have been provided for resident (and not public) use within the proposed development (where indicated as “Commercial” on Level 1). It is intended that the types of uses to be accommodated within these spaces may include:

- Lounge
- Library
- Arts and Crafts “Maker Space”
- Dining Room
- Catering servery
- Bar / wine cellar
- Music room
- Billiards and games room

Allied health and Wellness services

Space (where indicated as “Commercial” on Ground level) is allocated for providers of various allied health and wellness services to set up clinics / classes / consultancies for both residents and public. Such spaces may include:

- Nail salon
- Hairdresser
- Day spa / massage therapist
- Consult room for visiting allied health / NURSE – dressings and treatments / medications
- Allied health – physio / chiro consulting
- Exercise room

The services have a “front door” from the Skyline Lane street frontage for public patronage, and potentially a rear door internal access for residents only.

Comment on applicability of SEPP 65 / ADG to Seniors Living

We note that Seniors Living accommodation has, in a number of ways, quite different needs to residential apartment accommodation for the general populace. There are many ADG guideline criteria that would be wrong to apply to seniors living.

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- 3D – not as much open space (25%) is needed for seniors – not needing to allow for the larger spaces / informal recreation / range of activities needed for children / teenagers / young adults playing soccer / cricket etc.
- 3J - bicycle parking is unnecessary for seniors living developments. The number of residents who may still have the ability to ride a bike is VERY minimal, and for any that would, they would want to retain it in their apartment, and not need to hang it or fix it to a bike rack.
- 4D – apartment layout -some of these criteria and “sample designs” are not workable and actually too small for seniors living that suitably allows aging in place. The proposed apartments in this scheme are all well larger than the minimum sizes.
- 4F – common circulation and spaces – opportunity for casual social interaction is important, and more apartments per floor plate will increase that. Eight is NOT a good criteria and is likely to have been based on access to a single lift, which is also not appropriate for seniors living, for reasons previously noted.
- 4K – apartment mix – in a development specifically and ONLY for seniors, a range of apartment types and sizes “to cater for different household types” is inappropriate. Some difference as are useful for seniors – two and three-bed, some with and without studies - is appropriate.

Design overview

The design as proposed has potential to develop into a vibrant Seniors Living community. The Allied Health / Wellness spaces are areas that will be purpose-designed as flexible to be capable of accommodating a number of different uses to suit Seniors as they age-in-place, and care-legislation and market expectations change over time.



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Attachment 8

**Revised Scheme
prepared by
PA Studio**

REVISED DRAWINGS FOR CONSIDERATION
BY SYDNEY NORTH PLANNING PANEL
18 DECEMBER 2018



DRAWING No.	NAME	REV	DATE
DA302	GROUND FLOOR PLAN	B	18.12.18
DA303	LEVELS 1 & 2 FLOOR PLANS	B	18.12.18
DA304	LEVELS 3 & 4 FLOOR PLANS	B	18.12.18
DA305	LEVELS 5 & 6 FLOOR PLANS	B	18.12.18
DA306	ROOF PLANS	B	18.12.18
DA401	SECTIONS	B	18.12.18
DA501	NORTH ELEVATION	B	18.12.18
DA502	WEST ELEVATION	B	18.12.18
DA503	SOUTH ELEVATION	B	18.12.18
DA504	EAST ELEVATION	B	18.12.18

B	REVISION FOR PANEL CONSIDERATION	18.12.18
A	ORIGINAL ISSUE	28.03.18
ISSUE	REVISIONS	DATE

PROJECT:
Seniors Living
5 Skyline Place Frenchs Forest NSW 2086

SP 49558

COVER PAGE & DRAWING LIST

PA

STUDIO

LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089

TEL: 8968 1900 properties@platino.com.au ACN: 603 389 288

SCALE: 1:500	DRAWING
SUBSET: DA	DA000
DRAWN BY: FK/SU/WH	ISSUE B

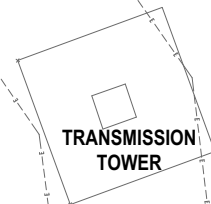
RELOCATED COMMUNITY GARDEN FRENCHS FOREST ROAD EAST



Printed 14/12/2018

No 79
FRENCHS
FOREST RD

EXISTING 3-STORY
BRICK BUILDING AT
No.1 SKYLINE PLACE



TRANSMISSION
TOWER



B	REVISION FOR PANEL CONSIDERATION	18.12.18
A	ORIGINAL ISSUE	28.03.18
ISSUE	REVISIONS	DATE

PROJECT:
Seniors Living
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GROUND FLOOR PLAN

PA STUDIO

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TEL: 8968 1900 properties@platinio.com.au ACN: 603 389 288

SCALE: 1:500

SUBSET: PLANS

DRAWN BY: FK/SU/WH

DRAWING

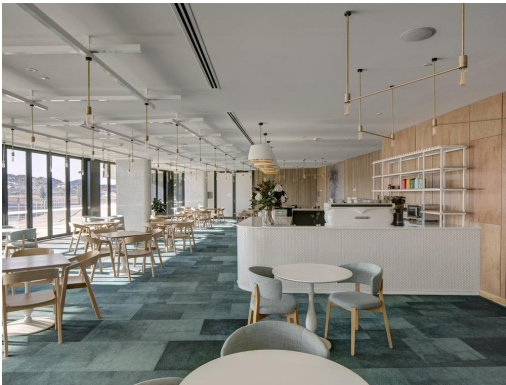
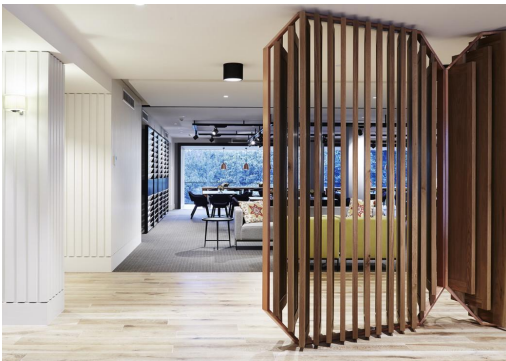
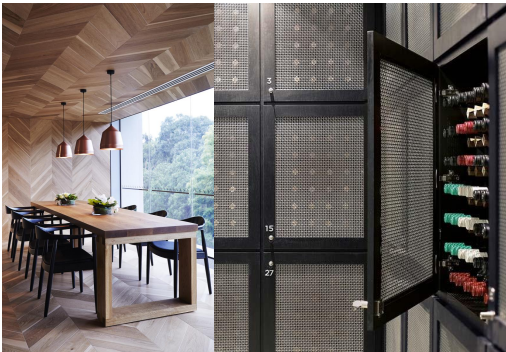
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ISSUE

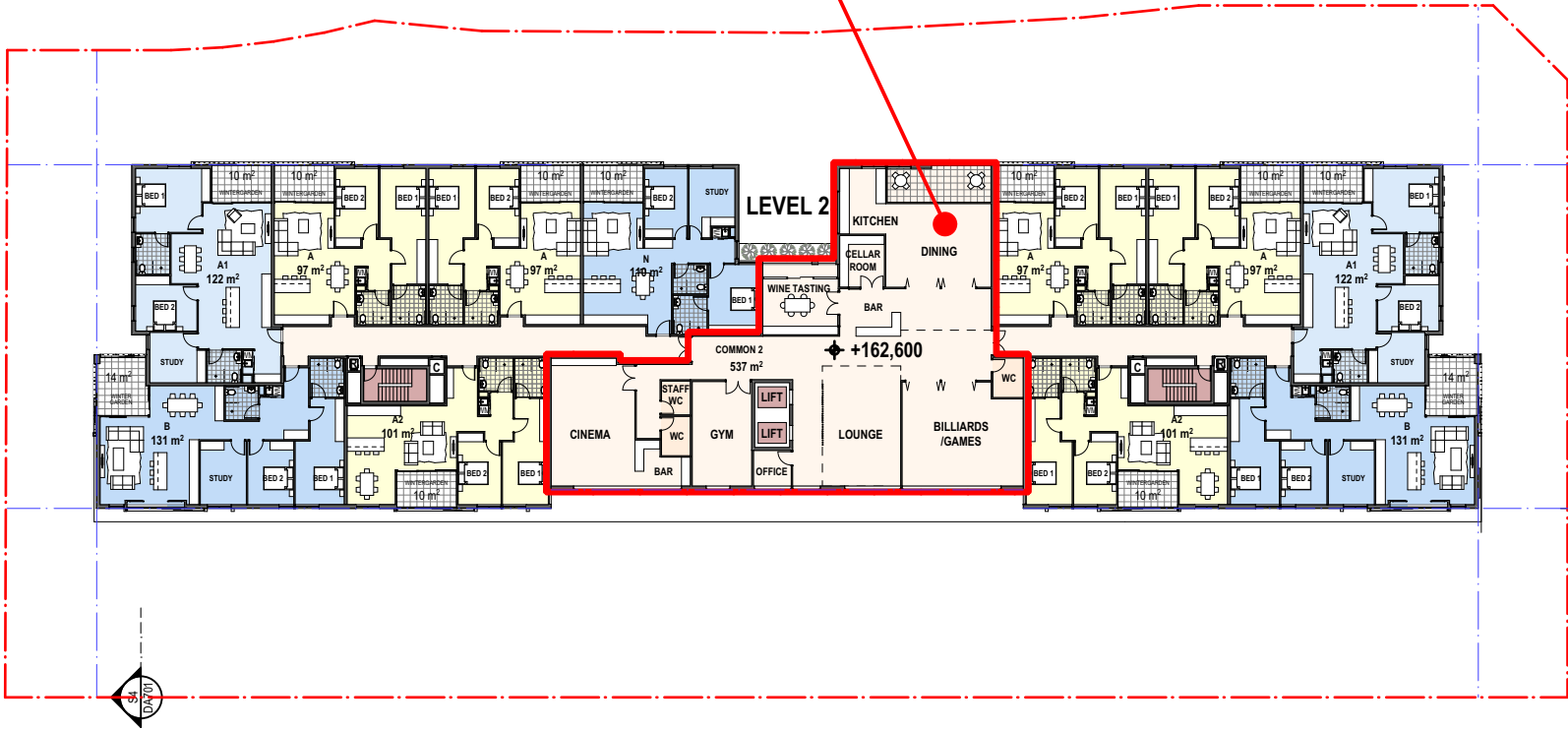
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COMMON FACILITIES
PRECEDENTS



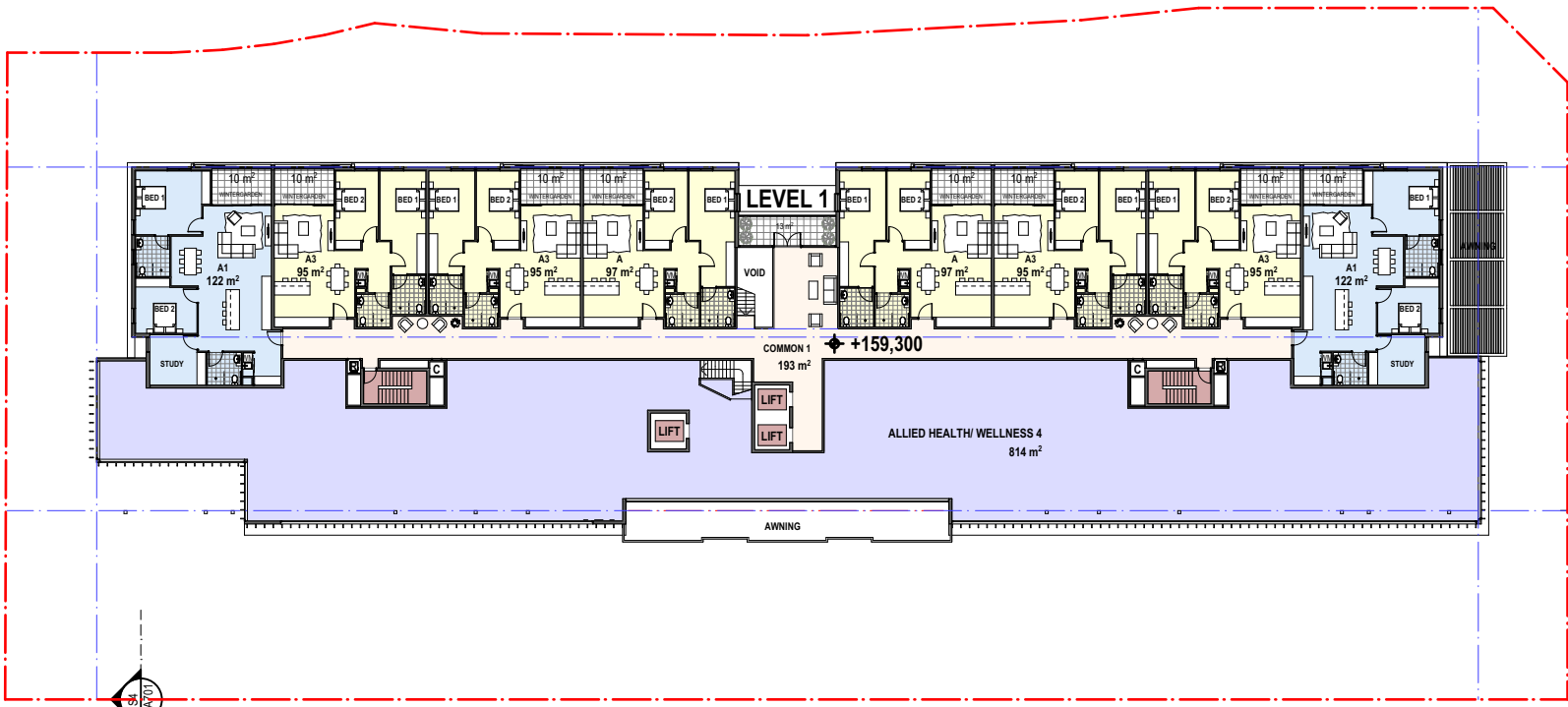
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WITH NEW COMMUNAL AREA



LEVEL 2

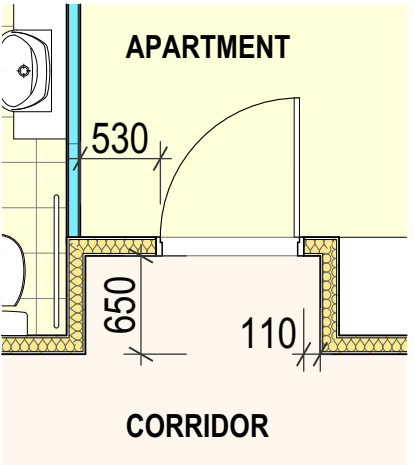
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LEVEL 1

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CORRIDOR RECESS DETAIL 1:50

650mm RECESS FOR
PRIVACY AT ENTRY &
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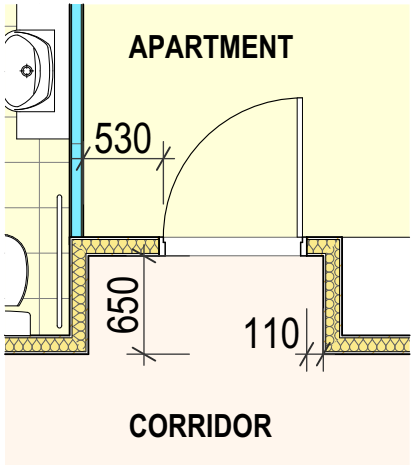
**LEVELS 1 & 2 FLOOR
PLANS**

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NO CHANGE



CORRIDOR RECESS DETAIL 1:50

650mm RECESS FOR
PRIVACY AT ENTRY &
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CORRIDOR

NO CHANGE



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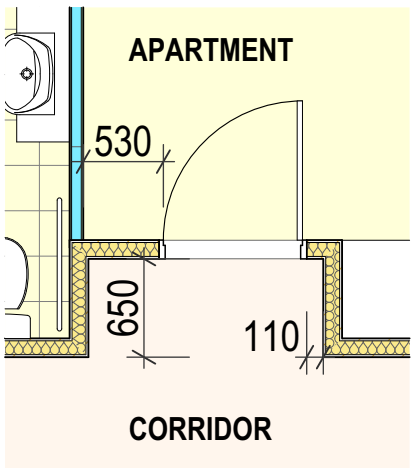
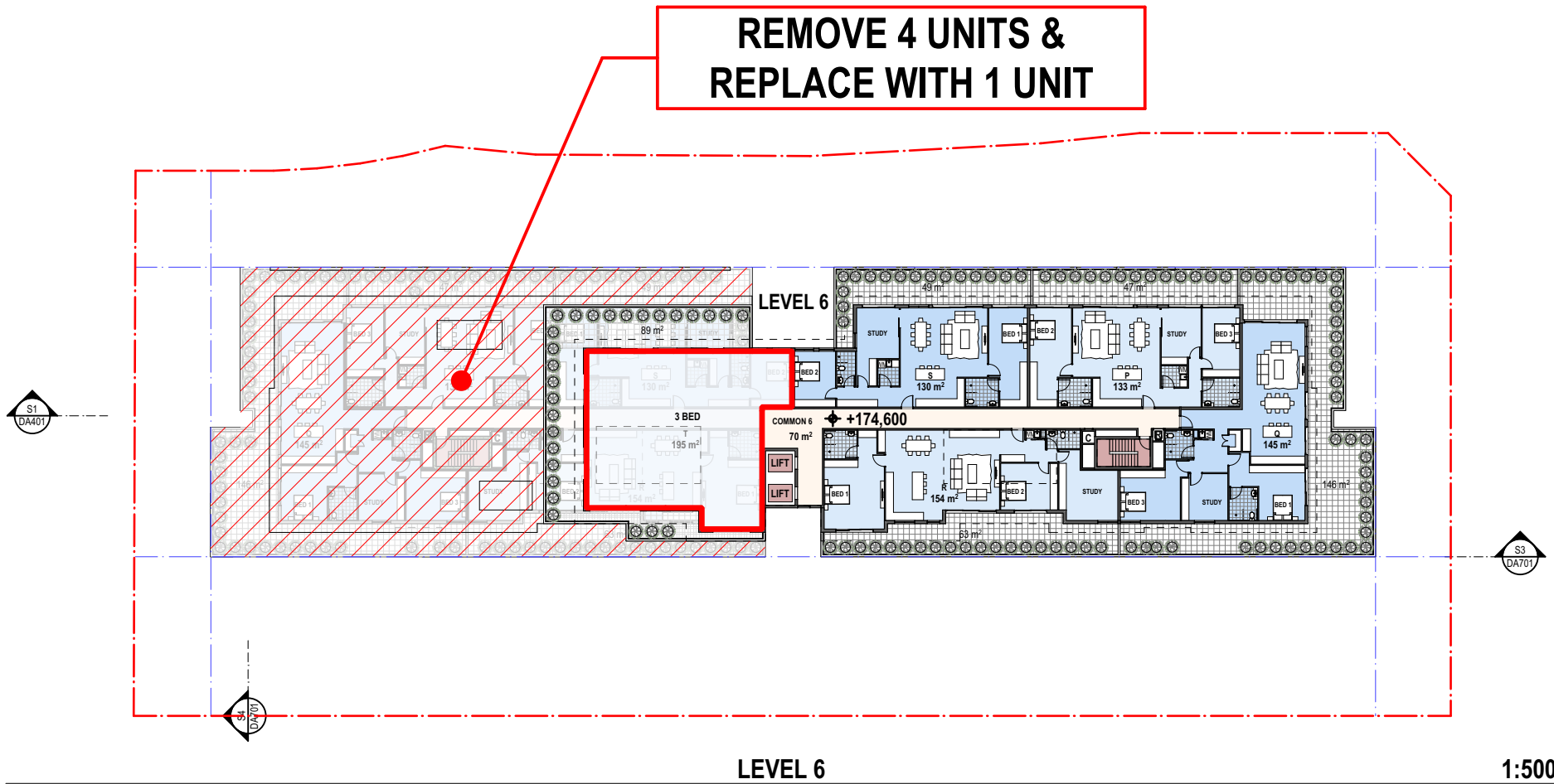
SP 49558

LEVELS 3 & 4 FLOOR PLANS

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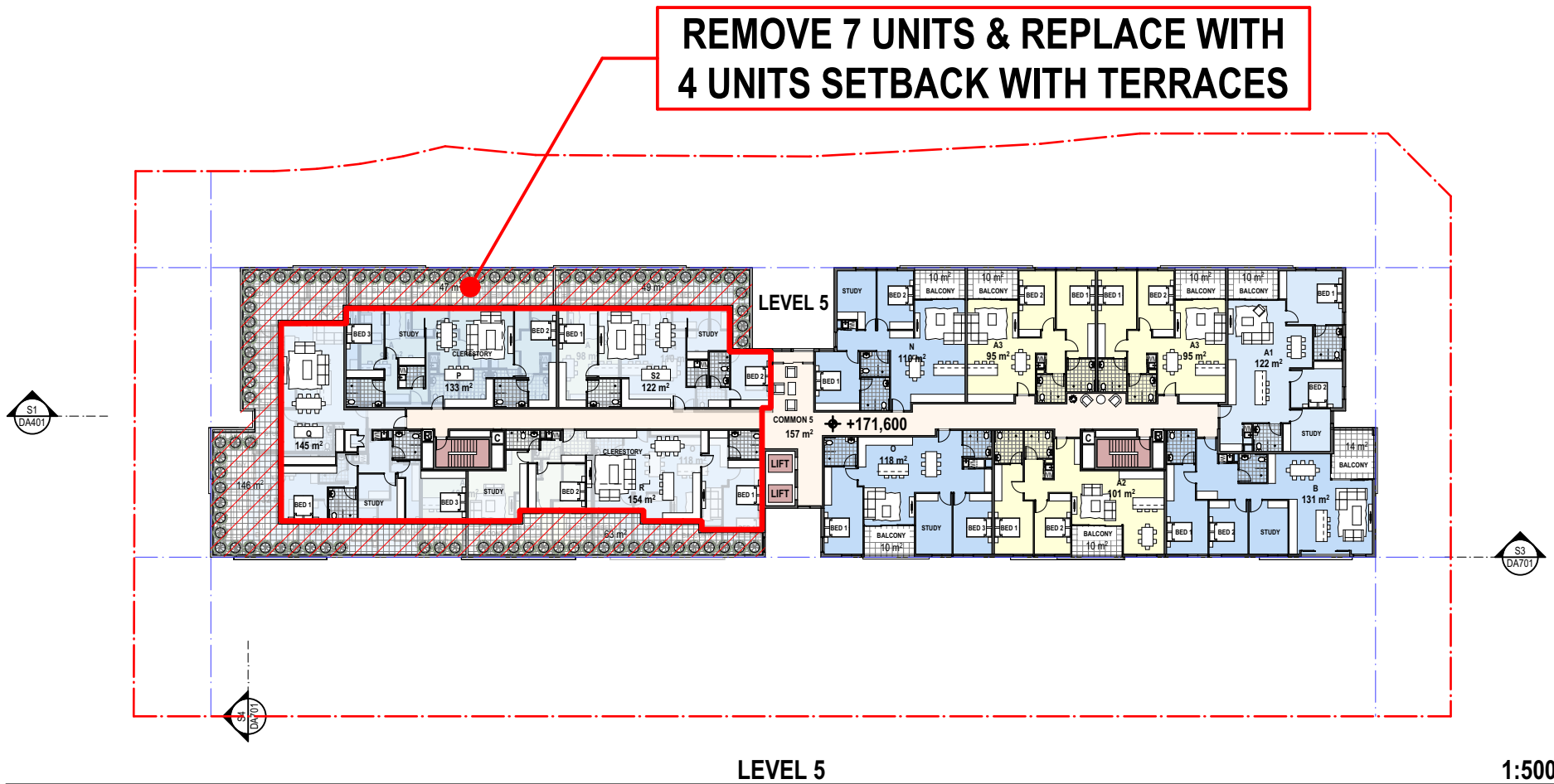
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CORRIDOR RECESS DETAIL 1:50

650mm RECESS FOR
PRIVACY AT ENTRY &
ARTICULATION OF
CORRIDOR



B	REVISION FOR PANEL CONSIDERATION	18.12.18
A	ORIGINAL ISSUE	28.03.18
ISSUE	REVISIONS	DATE

PROJECT:
Seniors Living
5 Skyline Place Frenchs Forest NSW 2086

SP 49558

LEVELS 5 & 6 FLOOR PLANS

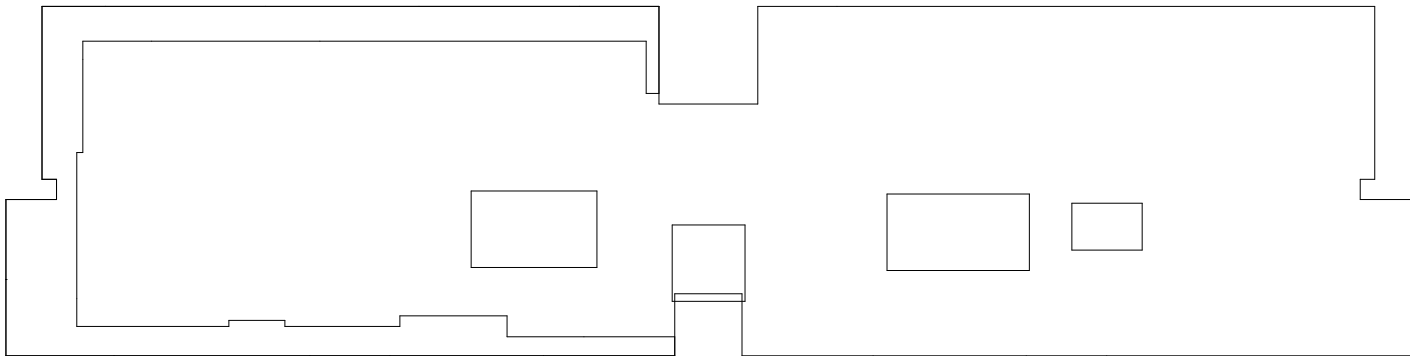
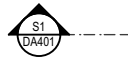
PA STUDIO
LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089
TEL: 8968 1900 properties@platinio.com.au ACN: 603 389 288

SCALE: 1:500	DRAWING
SUBSET: PLANS	DA305
DRAWN BY: FK/SU/WH	ISSUE B

FILE: Z:\SKY5 SENIORS LIVING\SKY5 (DA) Staged (Amended for panel).pln

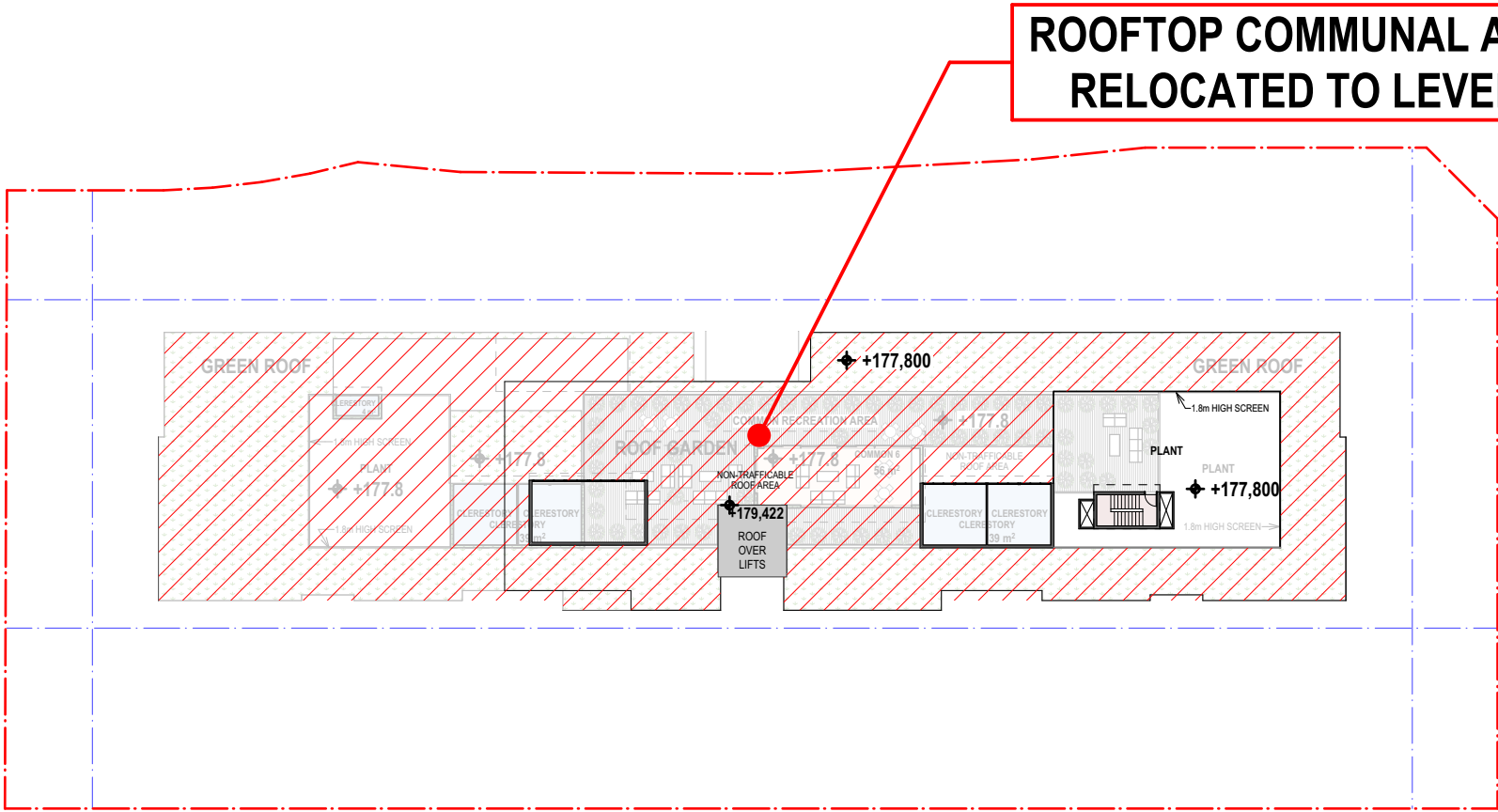
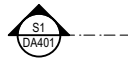


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UPPER ROOF

1:500



ROOF LEVEL

1:500

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ROOF PLANS

PA STUDIO
LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089
TEL: 8968 1900 properties@platinio.com.au ACN: 603 389 288

SCALE: 1:500	DRAWING
SUBSET: PLANS	DA306
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PROJECT: _____

SP 49558

SECTIONS

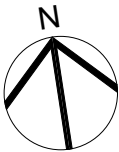
LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089
TEL: 8968 1900 properties@platino.com.au ACN: 603 389 288

FILE: Z:\SKY5 SENIORS LIVING\SKY5 (DA) Staged (Amended for panel).pln

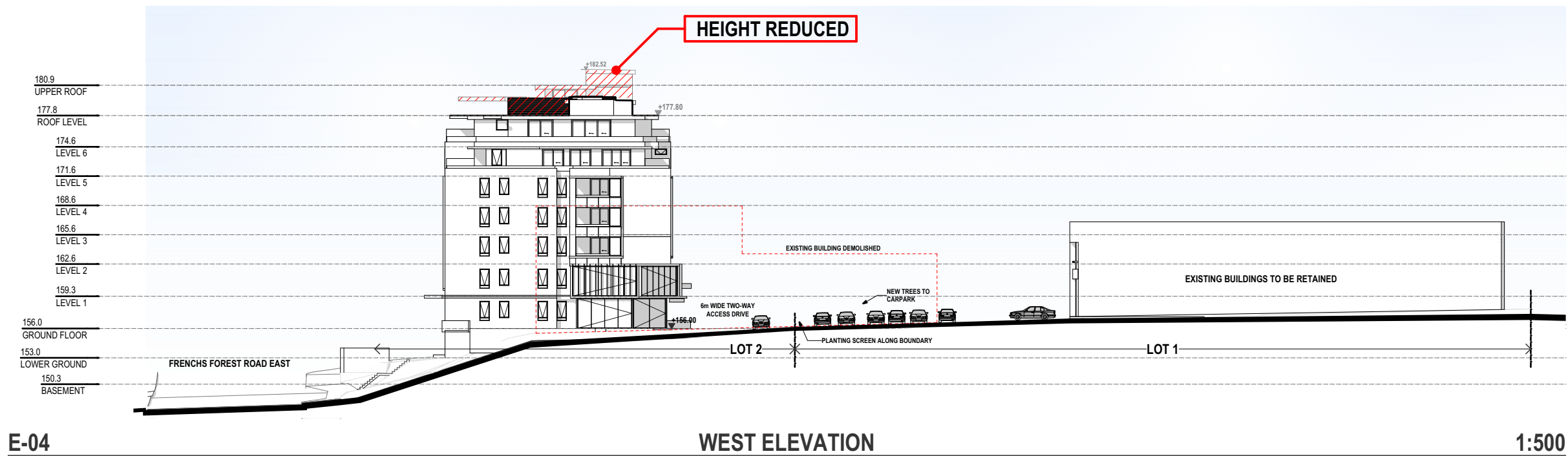
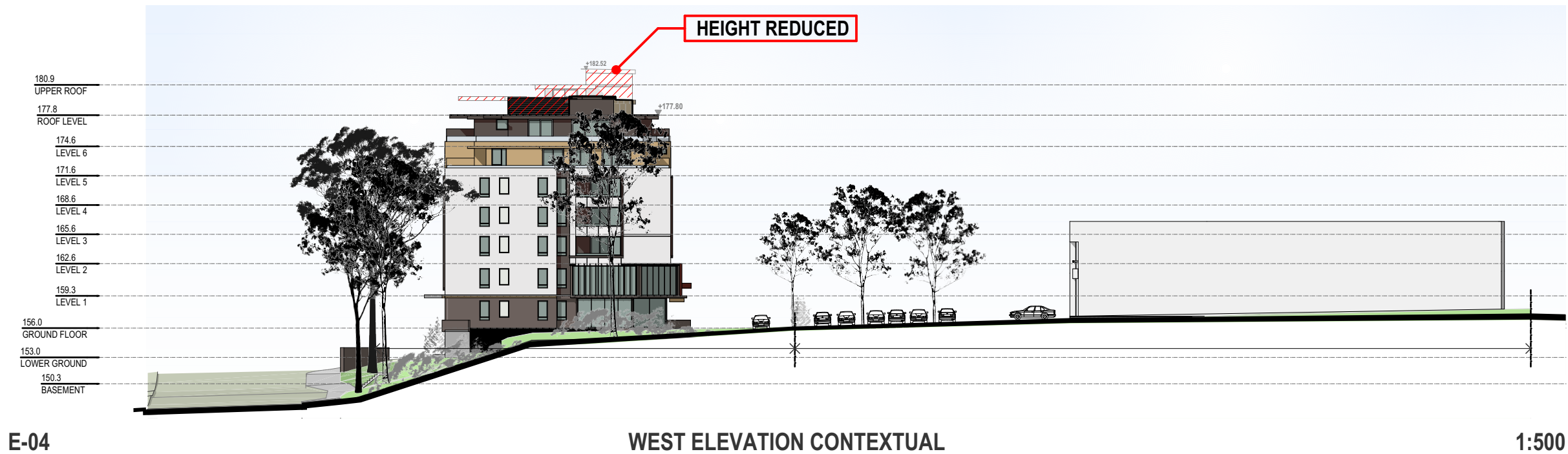




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PROJECT:
Seniors Living
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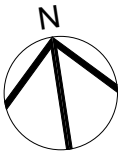
SP 49558

WEST ELEVATION

PA STUDIO
LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089
TEL: 8968 1900 properties@platinio.com.au ACN: 603 389 288

SCALE: 1:500	DRAWING
SUBSET: ELEVATIONS	DA502
DRAWN BY: FK/SU/WH	ISSUE B

FILE: Z:\SKY5 SENIORS LIVING\SKY5 (DA) Staged (Amended for panel).pln



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E-03

SOUTH ELEVATION CONTEXTUAL

1:500



E-03

SOUTH ELEVATION

1:500

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PROJECT:
Seniors Living
5 Skyline Place Frenchs Forest NSW 2086

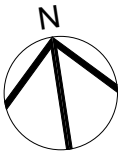
SP 49558

SOUTH ELEVATION

PA STUDIO
LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089
TEL: 8968 1900 properties@platinio.com.au ACN: 603 389 288

SCALE: 1:500	DRAWING
SUBSET: ELEVATIONS	DA503
DRAWN BY: FK/SU/WH	ISSUE B

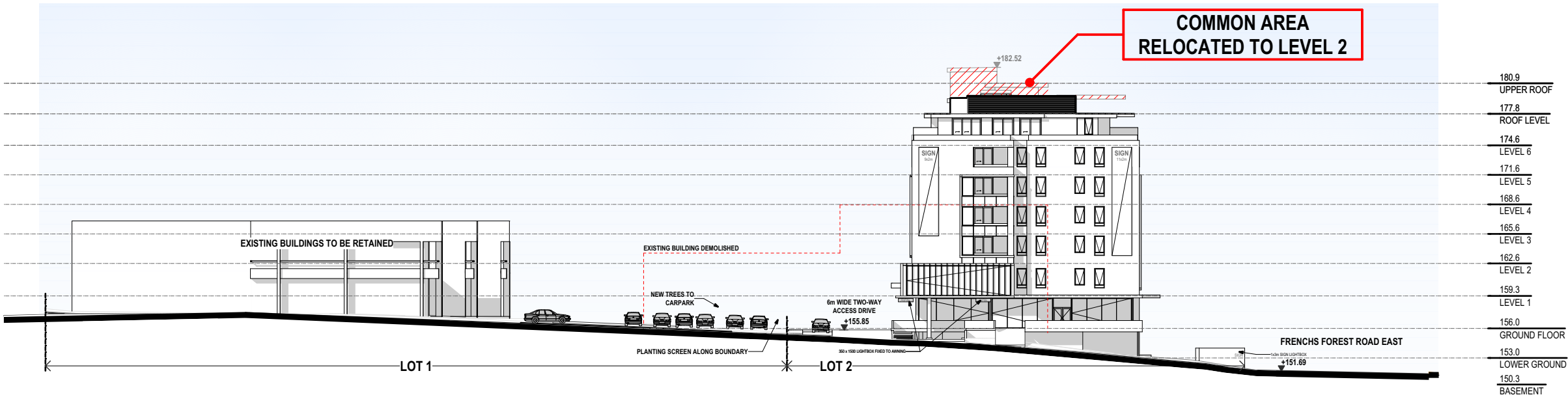
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E-02 EAST ELEVATION CONTEXTUAL 1:500



E-02 EAST ELEVATION 1:500

B	REVISION FOR PANEL CONSIDERATION	18.12.18
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ISSUE	REVISIONS	DATE

PROJECT:
Seniors Living
5 Skyline Place Frenchs Forest NSW 2086

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EAST ELEVATION

PA STUDIO
LEVEL 2 20 YOUNG STREET NEUTRAL BAY NSW 2089
TEL: 8968 1900 properties@platinio.com.au ACN: 603 389 288

SCALE: 1:500	DRAWING
SUBSET: ELEVATIONS	DA504
DRAWN BY: FK/SU/WH	ISSUE B

FILE: ZISKY5 SENIORS LIVING\ISKY5 (DA) Staged (Amended for panel).pln

Attachment 9

**Supplementary Advice – Contamination
prepared by
Benviron Group**

Date - 14/12/2018

Platino Properties
Level 2, 20 Young Street
Neutral Bay NSW 2089

Review of SEPP55 for Skyline Place, Frenchs Forest NSW

In accordance with Clause 7 (2) of SEPP 55, before determining an application for consent to carry out development that would involve a change of use on any of the land, the consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned carried out in accordance with the contaminated land planning guidelines.

A preliminary investigation has been undertaken by Benviron to fulfill the requirements of this clause. This investigation takes into consideration the desktop analysis of the land and previous uses on the site and concludes that there is some potential risk of contamination however, further assessment is required. The preliminary investigation concluded that the land can be made suitable, for the purpose for which the development is proposed to be carried out, subject to this additional assessment.

Clause 7(3) in SEPP 55 requires that the applicant for development consent must carry out the investigation required by subclause (2) and must provide a report on it to the consent authority. The consent authority may require the applicant to carry out, and provide a report on, a detailed investigation (as referred to in the

contaminated land planning guidelines) if it considers that the findings of the preliminary investigation warrant such an investigation.

It is to be noted that this clause does not exclude the potential for conditioning into the proposed DA. Further to this a detailed investigation is not practicable at this stage as to undertake borehole sampling would require that the building and hardstand areas that currently exist on the site to be demolished.

We would anticipate that a condition of development consent would require that any necessary detailed investigation must be undertaken prior to the issue of a construction certificate, and this would meet the requirements of clause 7(3) of SEPP 55. An early works DA could be issued to this effect which allows demolition and some minor excavation along with detailed investigation parameters.

We thank you for the opportunity of undertaking this report and we would be pleased to provide further information on any aspects of this report.

For and on behalf of

Benviron Group



Ben Buckley

Director

Principal Environmental Forensic Scientist

1.0 Limitations of this Assessment

Opinions are judgements, which are based on our understanding and interpretation of current regulatory standards, and should not be construed as legal opinions.

Soils that are to be excavated below the identified investigation levels have not been assessed and further excavations should proceed with care below this depth where further assessment should be undertaken immediately if indicators of contamination are identified.

Attachment 10

**Supplementary Advice – Stormwater
prepared by
ING Consulting Engineers**

5SkylinePIFrenchsForestINGResponse14Dec18

14 December 2018

Mr George Revay
Platino Properties
11/20 Young Street
Neutral Bay NSW 2089

Dear George

RE : DA2018/0995 – SUBDIVISION OF LAND INTO 2 ALLOTMENTS, DEMOLITION OF EXISTING STRUCTURES, AND CONSTRUCTION OF A MIXED USE DEVELOPMENT CONTAINING 78 SENIORS HOUSING UNITS AND COMMERCIAL SPACE – ING’S RESPONSE

1. We have reviewed the Councils assessment report 18 December 2018 as it relates to matters associated with stormwater.
2. We understand that Council states that the development application cannot be supported because of the following, with corresponding response in “blue” as follows :
 - i. *The stormwater drainage concept plan has been reviewed and cannot be supported for the following reasons – A DRAINS model has not been submitted to Council for assessment as required by section 3.1.3 of Council’s On-Site Stormwater Detention manual. It is also not clear if the detention volumes and flows have been determined based on the pre-state of nature flows.*

Res. The Stormwater design using DRAINS was done based on pre and post development scenarios. A copy of the DRAINS model file was forwarded previously at DA submission stage, and is attached again for easy reference. A screen dump of the model results, appended on the Stormwater drawing 087122017DA Sheet 08712-04/19 Issue A dated 20 April 2018 is appended on the next page.

DRAINS results prepared from Version 2018.03
PIT / NODE DETAILS

Version 8													
Name	Max HGL	Max Pond	Max Surface	Max Pond	Min	Overflow	Constraint						
KIP	150.15	HGL	Flow Arriving (cu.m/s)	Volume (cu.m)	Freeboard (m)	(cu.m/s)							
SUB-CATCHMENT DETAILS													
Name	Max	Paved	Grassed	Paved	Grassed	Supp.	Due to Storm						
	Flow Q (cu.m/s)	Max Q (cu.m/s)	Max Q (cu.m/s)	Te (mm)	Te (mm)	Te (mm)							
Lot 2 - Pre	0.293	0	0.293	5	5	0	AR&R 100 year, 15 minutes storm, average 176.2 mm/h,						
Lot 2 - Post	0.315	0.196	0.119	5	5	0	AR&R 100 year, 15 minutes storm, average 176.2 mm/h,						
Outflow Volumes for Total Catchment (0.26 impervious + 0.67 pervious = 0.96 total ha)													
Storm	Total Rainfall (cu.m 220.25)	Total Runoff (cu.m (Runoff %))	Impervious Runoff (cu.m (Runoff %))	Pervious Runoff (cu.m (Runoff %))									
AR&R 100 year, 5 minutes storm, average 276.1 mm/h, Zone 1		158.06 (72.2%)	62.57 (65.7%)	96.30 (62.2%)									
AR&R 100 year, 10 minutes storm, average 211.2 mm/h, Zone 1	336.89	281.12 (77.5%)	97.21 (97.2%)	193.91 (89.2%)									
AR&R 100 year, 15 minutes storm, average 176.2 mm/h, Zone 1	421.66	353.50 (79.1%)	122.56 (97.7%)	231.02 (71.2%)									
AR&R 100 year, 20 minutes storm, average 153.4 mm/h, Zone 1	499.35	390.26 (78.0%)	142.49 (90.0%)	247.79 (72.0%)									
AR&R 100 year, 25 minutes storm, average 136.9 mm/h, Zone 1	545.88	438.18 (79.9%)	159.28 (96.2%)	279.89 (72.2%)									
AR&R 100 year, 30 minutes storm, average 124.4 mm/h, Zone 1	595.25	476.36 (80.0%)	173.05 (96.4%)	302.42 (72.3%)									
AR&R 100 year, 45 minutes storm, average 99.56 mm/h, Zone 1	714.73	573.28 (80.2%)	209.43 (90.7%)	363.85 (72.4%)									
AR&R 100 year, 1 hour storm, average 84.46 mm/h, Zone 1	806.26	643.16 (80.2%)	237.22 (96.4%)	411.96 (72.5%)									
AR&R 100 year, 2 hours storm, average 50.00 mm/h, Zone 1	1004.65	814.65 (80.0%)	299.35 (99.1%)	555.59 (72.0%)									
AR&R 100 year, 4.5 hours storm, average 35 mm/h, Zone 1	1507.29	1202.03 (79.7%)	444.82 (99.4%)	757.21 (71.5%)									
AR&R 100 year, 6 hours storm, average 26.63 mm/h, Zone 1	1701.35	1336.63 (78.7%)	502.46 (99.4%)	836.17 (80.9%)									
AR&R 100 year, 9 hours storm, average 23 mm/h, Zone 1	1881.04	1505.32 (79.0%)	562.53 (99.5%)	919.80 (80.0%)									
PIPE DETAILS													
Name	Max Q	Max V	Max U/S	Max D/S	Due to Storm								
Outlet Pipe	(cu.m/s)	(m/s)	HGL (m)	HGL (m)	AR&R 100 year, 25 minutes storm, average 136.9 mm/h, Zone 1								
	0.215	0.2	153.147	150.147									
CHANNEL DETAILS													
Name	Max Q	Max V	Chainage	Max	Due to Storm								
	(cu.m/s)	(m/s)	(m)	HGL (m)									
OVERFLOW ROUTE DETAILS													
Name	Max Q U/S	Max Q D/S	Slope Q	Max Q	Max D/S	Max Width	Max V						
CF	0	0	1.685	0	0	0	0						
DETENTION BASIN DETAILS													
Name	Max WL	Max Vol	Max Q	Max Q	Max Q	High Level							
OSD	155.09	83.3	0.215	Low Level	0.215	0							
CONTINUITY CHECK for AR&R 100 year, 15 minutes storm, average 176.2 mm/h, Zone 1													
Node	Inflow (cu.m)	Outflow (cu.m)	Storage Change (cu.m)	Difference % 0									
KD	180.09	182.60	0.81										
OSD	183.3	182.60	0										
KIP	182.60	182.60	0										
Run Log for skyline5.dwg: run at 16:15:23 on 3/5/2018													
Flows were safe in all overflow routes.													

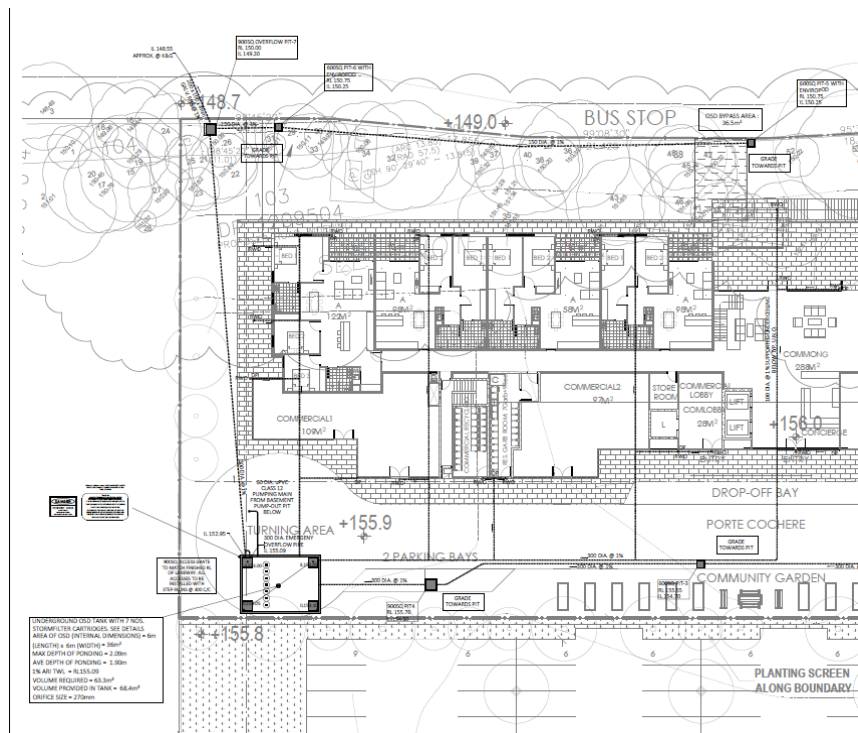
152.6

153.12

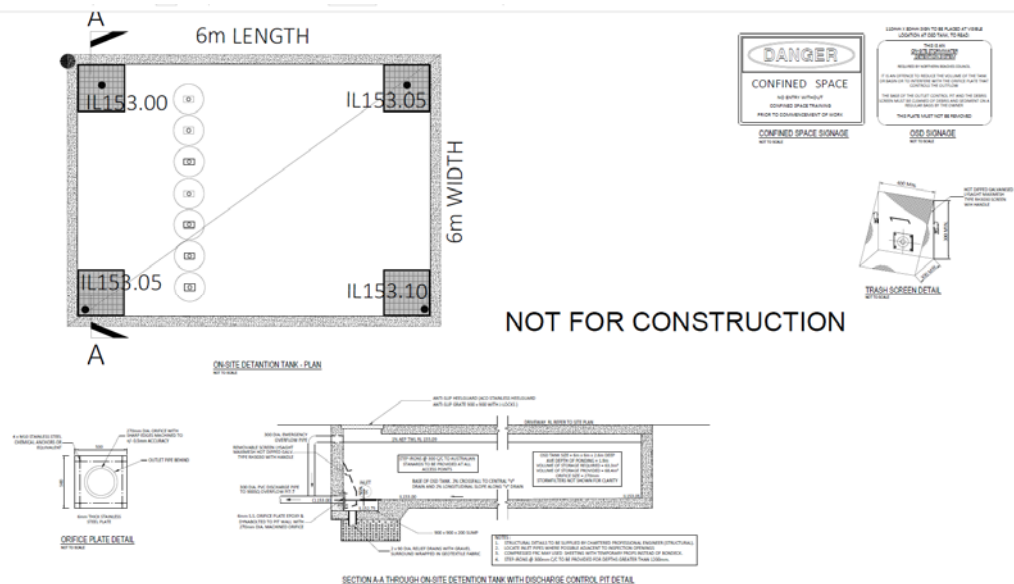
ii. Additionally as required by Section 3.1.3 (minimum information required for Developments) including

- Sections through the OSD tank relating to proposed buildings :
 - Longitudinal section of all pipes from the OSD basin to the discharge point in Frenchs Forest Road. The outlet pipe is to be a minimum of 375mm dia. and connected directly into a street inlet pit.
 - Details of surcharge facilities and overland flow paths shown on the drawings

Res. The underground OSD tank is located away from the building and under the garden area. The discharge from this OSD tank is conveyed to a 900mm x 900mm overflow pit at the boundary via a 300 dia. pipe for connection into the kerb and gutter. Overflows from the OSD tank is via a high level emergency overflow pipe (300mm in dia.), which reconnects underground to the 300mm dia. main discharge pipe for eventual discharge to the 900mm x 900mm overflow pit and thereafter to the street kerb. Please see screen dumps on next page (taken from drawing 087122017DA Sheets 08712-04/19 and 08712-018/19 Issue A dated 20 April 2018).

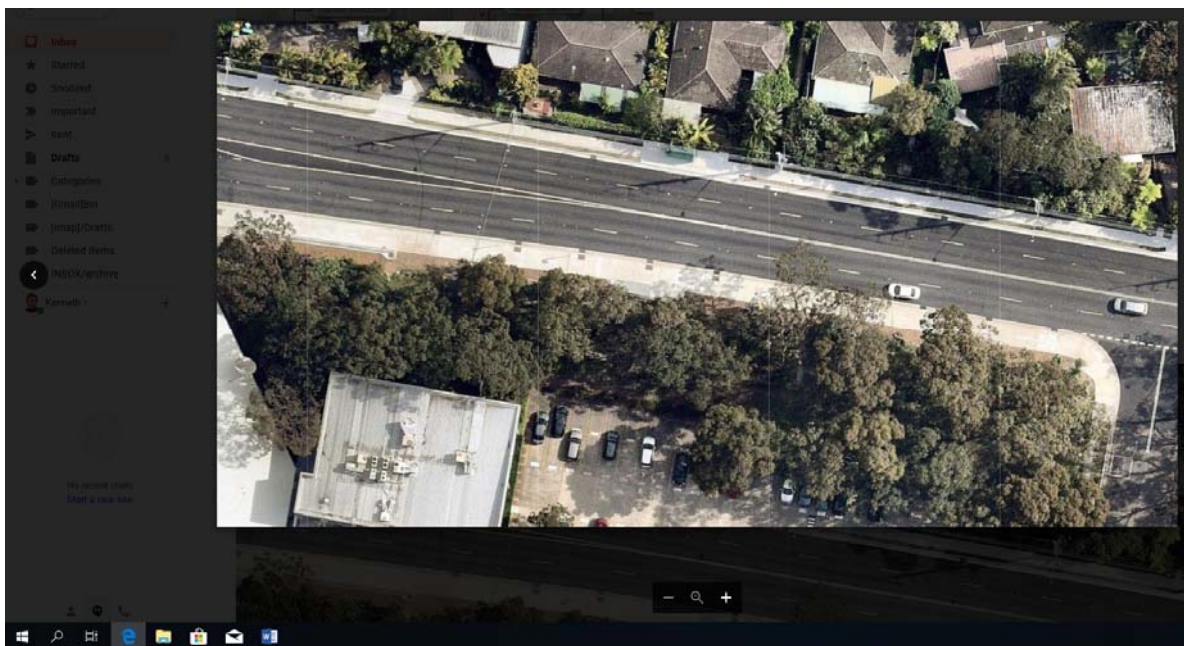


Part Site Plan Showing Underground OSD tank with Discharge Pipes and in Relation to Proposed Building



Underground OSD Tank Plan With Corresponding Cross Section

At the time of DA submission, Stage 1 – Hospital Connectivity (road widening of Frenchs Forest road East) of the Northern Beaches Hospital project was still ongoing. This stage of the project is now completed (please see screen dump below), and with the numerous kerb inlet pits installed, and together with the underground services, will be picked up in the updated survey for Detailed design of the connection pipework from the OSD tank to the 900mm x 900mm boundary pit and to the new kerb inlet pit as suggested by Council. The discharge pipe from the underground OSD tank, together with the outlet pipe from the 900mm x 900mm boundary pit for connection into the new kerb inlet pit, will be upgraded to 375mm dia. as also suggested by Council. This will be detailed prior to the Construction Certificate stage.



Aerial photo of the recently completed Stage 1 of the Northern Beaches Hospital project.
Note the numerous new kerb inlet pits which will allow discharge connection

- *Structural details of all tanks and pits.:*
 - *All supporting hydraulic and hydraulic calculations presented in a water management report. This is to include summary information regarding the OSD and associated drainage system in a format similar to drawing A1 9070-1.*
 - *Full details of relevant services in relation to the discharge line in Frenchs Forest Road.*

Res. A summary of the underground OSD tank was shown on drawing 087122017DA 08712-04/19 Issue A dated 20 April 2018 (please see screen dump on previous page). Typically the services tracing and detailed structural drawings are carried out prior to the Construction Certificate stage. The hydraulic calculations for inlet pit and pipework sizing were carried out, and can be summarised in a form as suggested by Council.

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3. Based on the above, we are confident that the issues raised by Council can be easily met at the detailed engineering design stage of this project, which would be completed prior to the issue of a Construction Certificate.
4. In this regard, we recommend that Council imposes appropriate Development Consent condition(s) which will ensure that the development can be designed to ensure full compliance with all of Council's controls and requests relating to stormwater discharge from the site.
5. Thank you.

Yours faithfully

ING CONSULTING ENGINEERS PTY LTD



Kenneth Ng (Principal)
MIEAust CPEng NER APEC Engineer
IntPE(Aus) RPEQ
Accredited Certifier (Cat. C1-C4, C6 & C15)
Building Professionals Board NSW