

## Report to the Sydney North Planning Panel on an application for a site compatibility certificate under State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

**SITE:** The Chatswood Golf Club site is located at 128 Beaconsfield Road, Chatswood (Figures 1 and 2).

The part of this site to which the proposed seniors housing development is legally described as part Lot 163 DP752067, part Lot 1 DP651667, part Lot 1 DP1124646 and part Lot 22 DP626634 (Figure 3, next page).

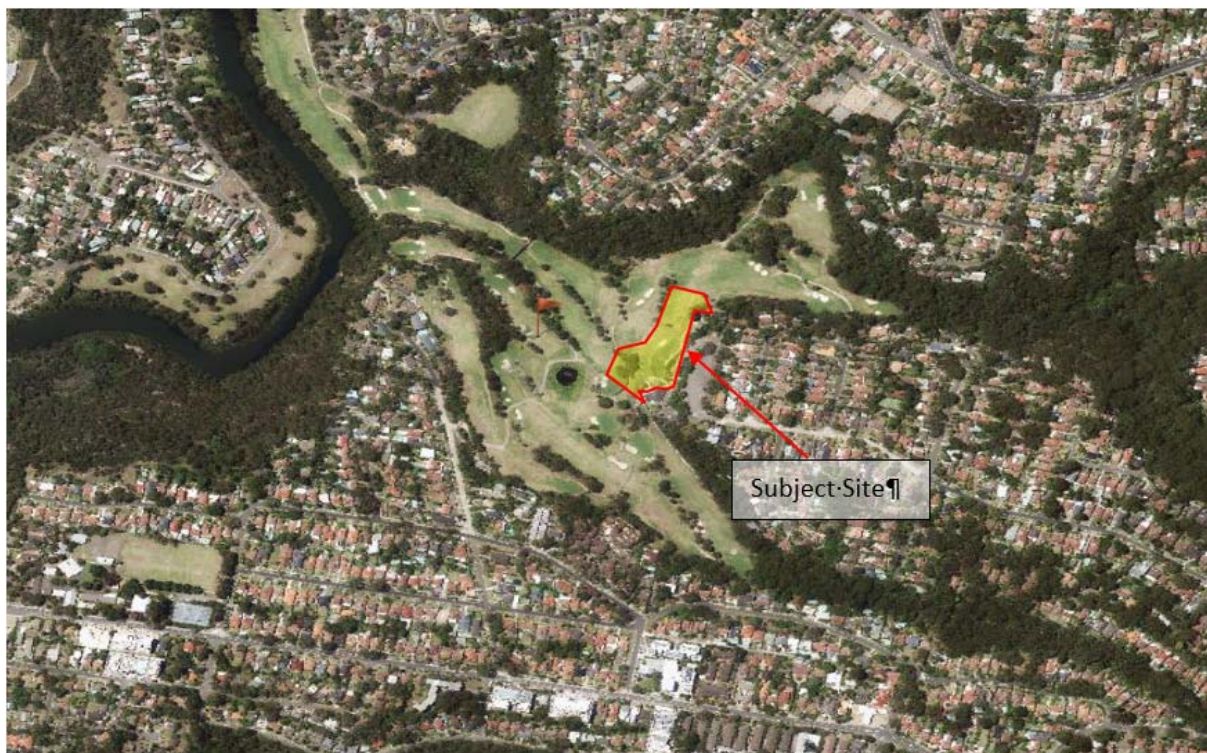


Figure 1: Aerial photo of site (source: SIX Maps).

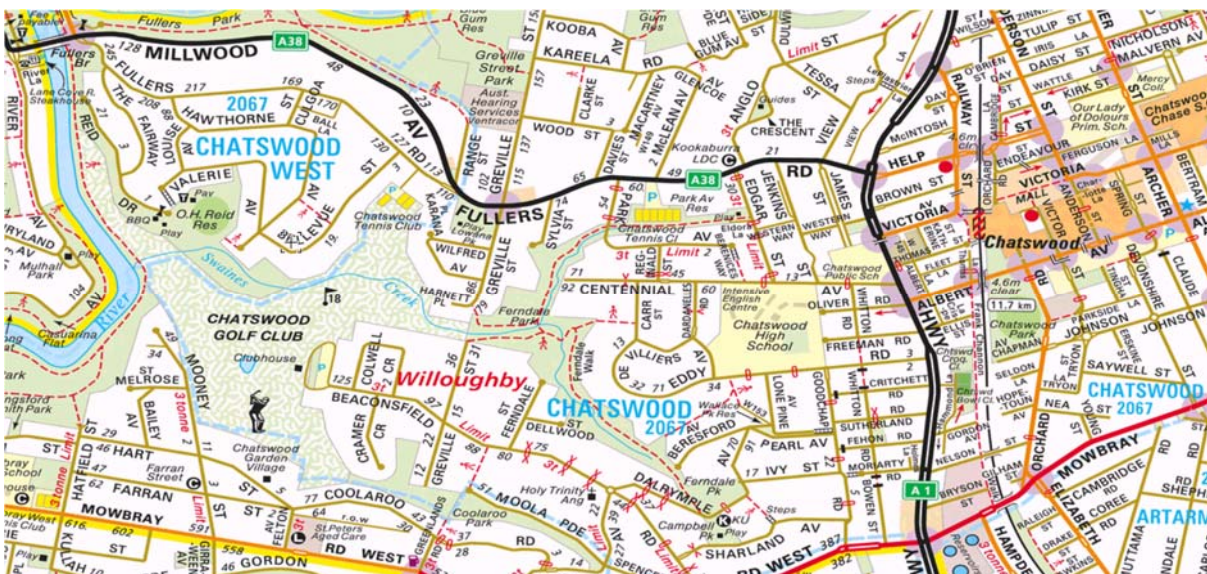


Figure 2: Site context map (source: Smyth Planning).





Figure 3: Existing lots and proposed site planning (source: Marchese Partners).

**LGA:** Willoughby

**APPLICANT:** Watermark Chatswood Pty Ltd

**PROPOSAL:** The proposal is for 106 seniors serviced self-care housing<sup>1</sup> and ancillary facilities on the site of the Chatswood Golf clubhouse at 128 Beaconsfield Road, Chatswood. The proposal includes the redevelopment and integration of a new clubhouse.

The proposal is intended to be 4-5 storeys in height and accommodate two levels of basement and at-grade parking for a total of 295 spaces. Of the 295 spaces, 145 spaces are for the club and 150 spaces are for the seniors housing. The new club premises will contain a restaurant, a café/bistro, a wellness centre and associated facilities.

Indicative building plans have been provided for the site showing the proposal in the context of its surrounds (Figures 4 and 5, next page).

A temporary clubhouse and parking area (while not part of this site compatibility certificate application) are also proposed to allow the continued operation of the club

<sup>1</sup> Under clause 13 of the Seniors SEPP, 'serviced self-care housing' is defined as "seniors housing that consists of self-contained dwellings where the following services are available on the site: meals, cleaning services, personal care, nursing care".

A 'self-contained dwelling' is also defined under clause 13 as "a dwelling or part of a building (other than a hostel), whether attached to another dwelling or not, housing seniors or people with a disability, where private facilities for significant cooking, sleeping and washing are included in the dwelling or part of the building, but where clothes washing facilities or other facilities for use in connection with the dwelling or part of the building may be provided on a shared basis".

and golf course during construction of the seniors housing and permanent clubhouse (Figures 3 and 6, next page). At completion, the temporary clubhouse will be converted into a maintenance facility.

The development is proposed to be situated largely on the footprint of the existing clubhouse and associated paved areas and driveways.

Architectural scheme drawings and an architectural statement for the proposal by Marchese Partners are provided at **Attachment E**.

The proposal is also supported by an arboriculture report, a flood assessment, an infrastructure services report, a flora and fauna assessment, a geotechnical report, a bushfire assessment, a traffic and parking assessment, preliminary stage 1 and stage 2 environmental assessments and a landscape plan and statement (**Attachment E**).



Figure 4: Indicative building plan (source: Marchese Partners).

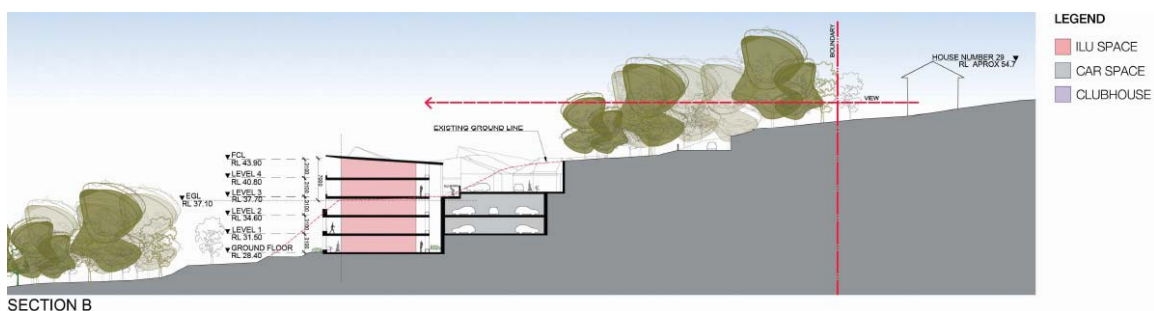


Figure 5: Indicative section plan of scheme (source: Marchese Partners).





Figure 6: Proposed temporary clubhouse and seniors housing development (source: SIX Maps).

## PERMISSIBILITY STATEMENT

The subject site is owned and operated by the Chatswood Golf Club and is considered to be a registered club. It is zoned RE2 Private Recreation under the Willoughby Local Environmental Plan (LEP) 2012 (Figure 7, next page). Seniors housing is not a permitted land use in this zone under the LEP.

The subject site (Lot 163 DP752067, Lot 1 DP651667, Lot 1 DP1124646 and Lot 22 DP626634) also directly adjoins land that is zoned E4 Environmental Living, E2 Environmental Conservation and RE2 Private Recreation (being the remainder of the golf course site). The LEP prohibits seniors housing in these adjoining zones.

In accordance with clause 24 of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors Housing SEPP), the applicant is seeking a site compatibility certificate (SCC) on the basis that the site is currently used for the purposes of a registered club (clause 24(1)(a)(iii)).

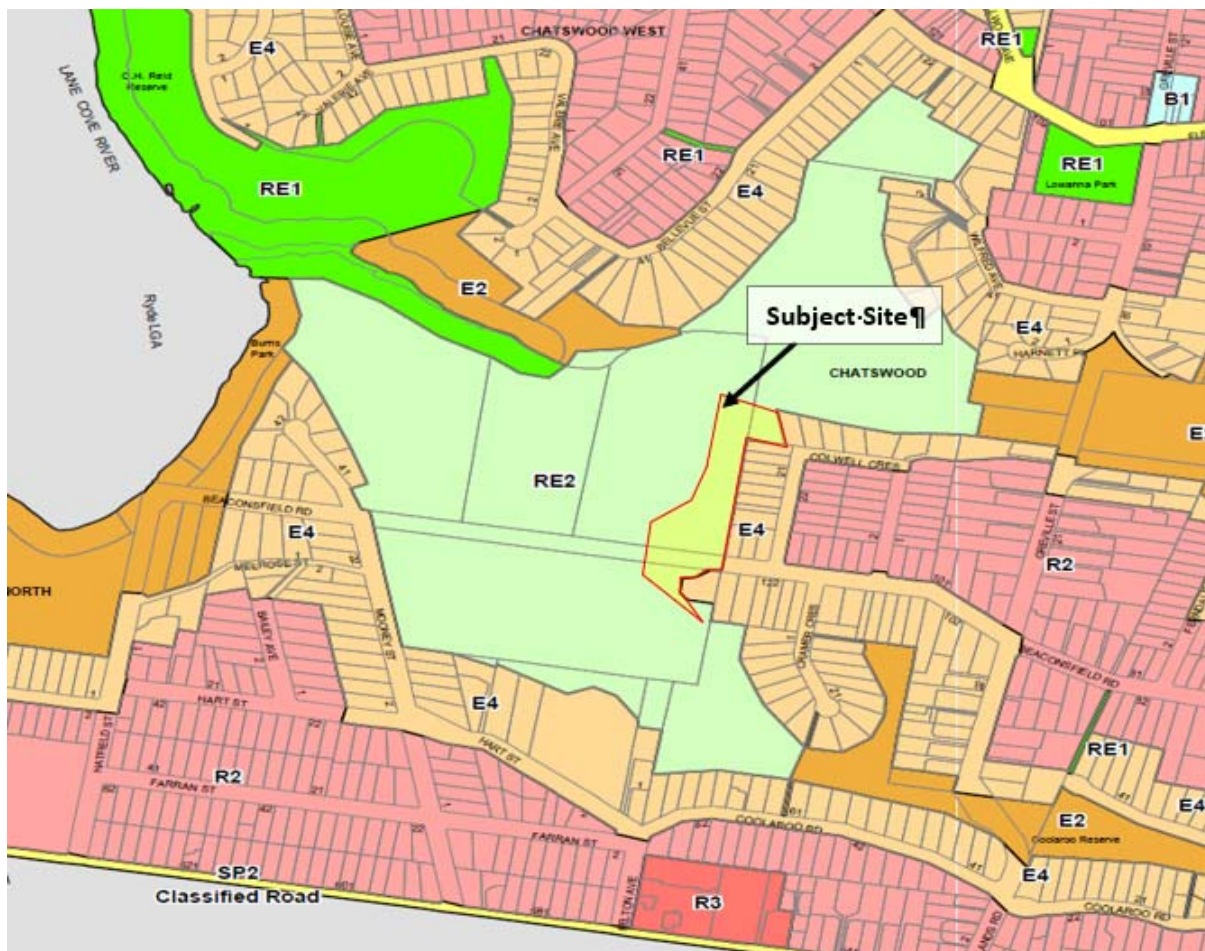


Figure 7: Land Zoning Map (Willoughby LEP 2012)

## **DOES THE SENIORS HOUSING SEPP APPLY TO THE SUBJECT SITE?**

Subject to other considerations detailed later in this report, the Seniors Housing SEPP applies to land that is:

- zoned 'primarily for urban purposes' or land that 'adjoins land zoned primarily for urban purposes' (clause 4(1)); and
- where development for the purpose of any of the following is permitted on the land:
  - dwelling houses;
  - residential flat buildings;
  - hospitals;
  - development of a kind identified in respect of land zoned as special uses; or
  - the land is being used for the purposes of a registered club.

## **IS THE SUBJECT SITE ZONED 'PRIMARILY FOR URBAN PURPOSES' OR DOES IT 'ADJOIN LAND ZONED PRIMARILY FOR URBAN PURPOSES'?**

Land not zoned primarily for urban purposes is defined under clause 4(2) of the Seniors Housing SEPP as (but not limited to) land that is:

- principally for rural purposes;
- principally for urban investigation; or
- a zone that is identified as principally for residential uses on large residential allotments (e.g. R5 Large Lot Residential or RU6 Transition zones as per the Standard Instrument LEP).

Despite this, it does not mean that all other land is therefore land 'zoned primarily for urban purposes'.

The SCC application states that the subject site is not land zoned primarily for urban purposes, but rather adjoins land zoned primarily for an urban purpose, which has been argued by the proponent to be the E4 Environmental Living-zoned land.

After reviewing the characteristics and the key objectives of this E4 zone, being to protect and enhance the natural features and bushland in the immediate locality (including natural vegetation, geological features, drainage patterns, the water table and the relationship of development to the natural topography), the Department considers that the adjoining E4 land is not land 'primarily' zoned for urban purposes.

The site is approximately 60m from land that is zoned R2 Low Density Residential. The Land and Environment Court has previously determined land within 71.1m of land zoned primarily for an urban purpose is in 'sufficient proximity' to be considered to be land which adjoins land primarily for urban purposes.

On this basis the Department is satisfied that the site adjoins land primarily for urban purposes and therefore seniors housing is permitted on the subject site in accordance with the Seniors Housing SEPP (Figure 8).

Under clause 17 of the Seniors Housing SEPP, a consent authority must not consent to a development application for seniors housing on land that adjoins land zoned primarily for urban purposes unless the proposed development is for the purpose of one or more of the following types of seniors housing: a hostel; a residential care facility; and/or serviced self-care housing. The original proposal sought to develop 106 'in-fill serviced self-care units'. However, the proponent has written seeking to



formally amend the SCC application lodged 14 July 2017 to clarify that the proposed 106 seniors housing dwellings will be 'serviced self-care housing'.

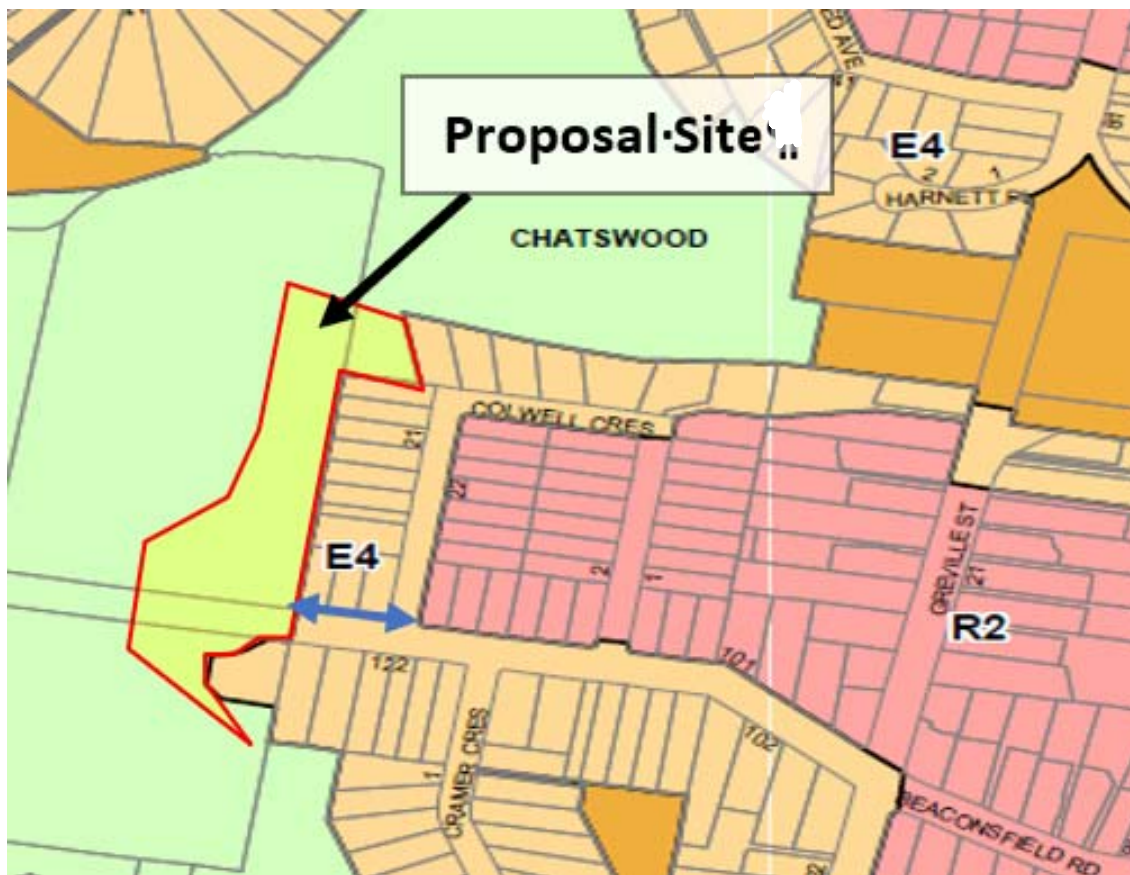


Figure 8: Distance between proposal site and the R2-zoned land – approximately 60m as indicated by blue arrow (Willoughby LEP 2012 zoning map).

### IS THE LAND EXCLUDED UNDER SCHEDULE 1?

Despite the Seniors Housing SEPP applying to the subject site under clauses 4(1) and 4(2) of the SEPP, clause 4(6)(a) of the SEPP provides that the SEPP does not apply to land described in schedule 1 of the SEPP (environmentally sensitive land). This includes land that is identified in another environmental planning instrument by any of the following descriptions, or by like descriptions, or descriptions that incorporate any of the following words or expressions:

- coastal protection;
- conservation (but not land identified as a heritage conservation area in another environmental planning instrument);
- critical habitat;
- environment protection;
- open space;
- escarpment;
- floodway;
- high flooding hazard;
- natural hazard;
- (repealed); and

- scenic (but not land that is so identified if:
  - the land is within a residential zone in which development of two storeys or more in height is permitted; or
  - an adjacent residential zone, also identified as scenic, permits development of two storeys or more in height);
- water catchment; and
- natural wetland.

While the subject site is within the coastal zone under State Environmental Planning Policy (Coastal Management) 2018 (Coastal SEPP) (Figure 9), it is not on land described in 'like terms' to any of the descriptions listed in Schedule 1 to the Seniors SEPP.

The Department considers the subject site is not described in an environmental planning instrument by the terms or like terms listed in schedule 1 of the Seniors Housing SEPP.

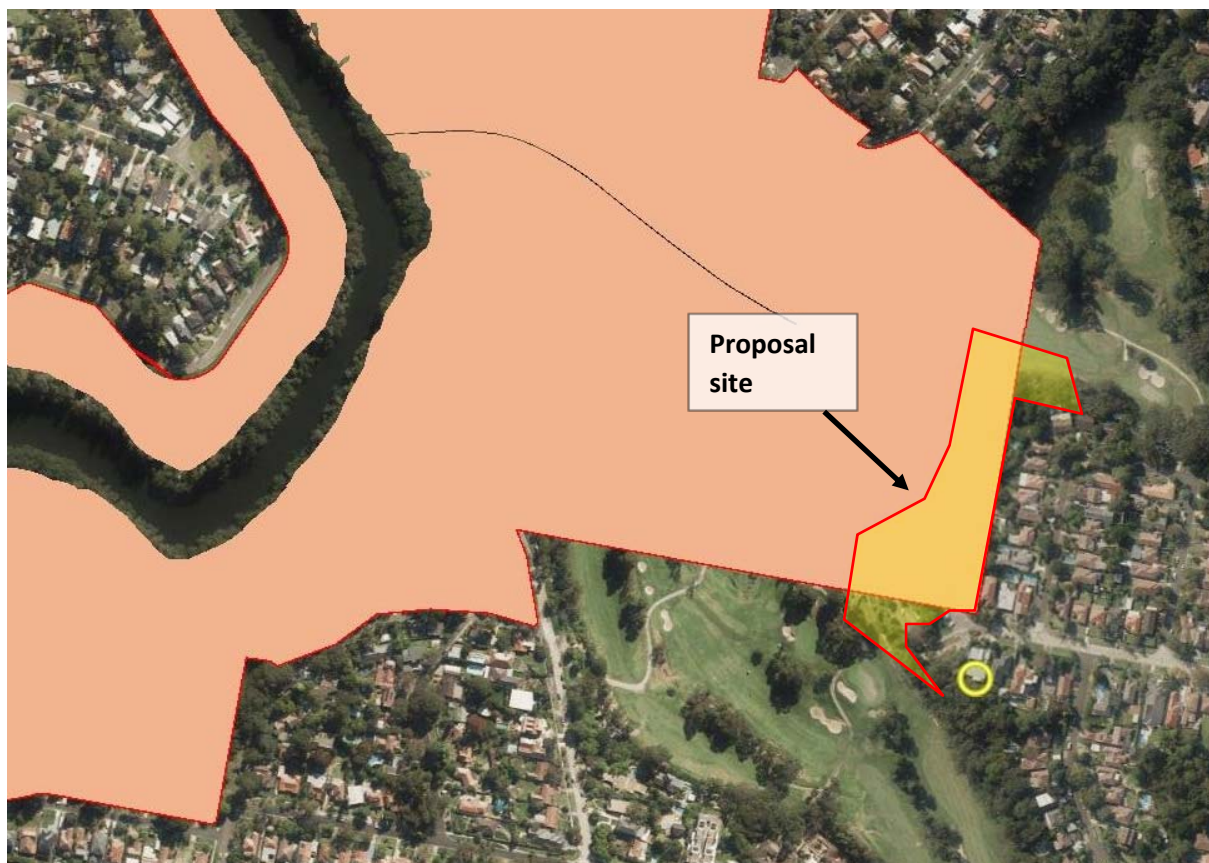


Figure 9: Coastal zone (Coastal SEPP mapping).

### **PREVIOUSLY ISSUED SITE COMPATIBILITY CERTIFICATE ON THE LAND**

No SCCs have been previously issued on the land.



## **PROXIMITY OF SITE TO WHICH THERE IS A CURRENT SITE COMPATIBILITY CERTIFICATE, OR AN APPLICATION HAS BEEN MADE BUT NOT YET DETERMINED**

There are no current SCCs or pending applications for SCCs for land near the site. As such, a cumulative impact study has not been provided.

However, under clause 25(2D) of the Seniors Housing SEPP, the panel may require an applicant to provide a cumulative impact study even if it has not been provided with the application if the panel considers that it is necessary for it to be provided to determine whether the subject land is suitable for more intensive development.

### **CLAUSES 24(2) AND 25(5)**

The panel must not issue a certificate unless the panel:

- (a) has taken into account any written comments concerning the consistency of the proposed development with the criteria referred to in clause 25(5)(b) received from the general manager of the council within 21 days after the application for the certificate was made;
- (b) is of the opinion that:
  - (i) the site of the proposed development is suitable for more intensive development; and
  - (ii) the proposed development for the purposes of seniors housing is compatible with the surrounding environment and surrounding land uses having regard to the criteria specified in clause 25(5)(b).

On 21 July 2017, Willoughby City Council was forwarded the application and advised comments would be required by 8 August 2017.

Council provided comments on 18 August (**Attachment G**) noting in-principle support of the SCC application subject to consideration of key issues, which are summarised below:

Issue	Council comments
Loss of open space	<p>Council's open space policy recognises there are limited opportunities to increase the amount of open space in the LGA. Council's preferred strategy is to retain all open space.</p> <p>The seniors living development, if restricted solely to the existing clubhouse and parking area, may be acceptable, although development on any additional space beyond these limits would not be.</p> <p>Council requests that should the Department issue an SCC, a statement should be included supporting Council's position that no further incursions into the green open space of the golf club will be entertained.</p>
Green network for grid and biodiversity	<p>Council considers the subject site forms an integral part of the overall green open space network that provides connections across the Council-managed reserves in the Lane Cove River catchment and into Lane Cove National Park. Council considers that the band of green space running through the site includes remnant native trees, non-native landscaping, tree planting and other green open space and is a significant element of the local green network.</p>

Issue	Council comments
	<p>Council notes that the construction of the temporary clubhouse off Mooney Street is an area previously rejected by Council for residential development and is likely to be controversial despite being temporary.</p> <p>Council confirms that Powerful Owls and Eastern Bentwing bats have been observed and recorded within the golf course and adjoining reserves.</p>
Vehicle access	<p>Council is concerned that despite bushfire asset protection zones integrated into planning for the proposal, the site has limited access and egress and creates a significant bottleneck in emergency situations.</p>

An assessment of Council's comments is provided below demonstrating that the matters raised by Council should not preclude the issuing of an SCC.

### **SUITABILITY FOR MORE INTENSIVE DEVELOPMENT**

The panel must not issue a certificate unless the panel is of the opinion that the site of the proposed development is suitable for more intensive development (clause 24(2)(a)).

#### **1. The site of the proposed development is suitable for more intensive development (clause 24(2)(a))**

The site forms part of the Chatswood Golf Course, which is in the valley and slopes of the Swaines Creek and Lane Cove River catchments. It adjoins low-density residential development to the east and has expansive and scenic views west towards the Lane Cove River and Lane Cove National Park.

Council noted a preference to retain all open space on the site and to restrict the proposal to the existing developed areas of the site. The proposal is largely located on land that comprises the existing clubhouse and parking area and will not compromise the use of the golf course. Therefore, the proposal is considered to minimise the potential loss of green open space by largely containing development to existing developed areas of the site and using basement parking and multi-storey buildings.

The development intends to provide an additional large landscaped private space east of the seniors living development, providing a vegetation buffer between the proposed development and the closest residential development to the east of the site and providing additional open space to support senior residents and their visitors.

The site is considered suitable for more intensive development as it:

- has sufficient space to accommodate the scale and proportion of the proposed development while allowing for the integration of a new club premises and retaining the entire golf course;
- is accessible to Chatswood and St Leonards as key strategic centres and the Lane Cove town centre, which collectively provide a range of services and facilities;
- is 5km or a 10-minute drive to the Royal North Shore public hospital;
- is readily accessible to services and facilities and public transport infrastructure; and
- has no constraints that could not be adequately addressed at the development application stage.

The development is considered suitable for the site given it:



- uses the existing accessway and local road network to the site;
- is confined to developed parts of the site; and
- will help meet the demand for increased seniors housing in the Willoughby LGA as identified in the Greater Sydney Region Plan and the North District Plan.

## **COMPATIBILITY WITH THE SURROUNDING ENVIRONMENT AND LAND USES**

The panel must not issue a certificate unless the panel is of the opinion that the proposed development for the purposes of seniors housing is compatible with the surrounding environment and surrounding land uses having regard to the following criteria (clause 25(5)(b)) and clause 24(2)(b)):

### **1. The natural environment (including known significant environmental values, resources or hazards) and the existing and approved uses of land in the vicinity of the proposed development (clause 25(5)(b)(i))**

The key site attributes and constraints are listed and discussed below in the context of a proposed seniors housing development on the land.

#### Flooding

Council's flood study identifies the entire site to be subject to flooding<sup>2</sup>. The site is identified as the Swaines Creek sub-catchment, which is subject to flood-related development controls.

The flood analysis report prepared by Marchese Partners as part of the SCC application identified three overland flood corridors: the Beaconsfield Road and Colwell Crescent overland flow paths; the northern flow path upstream of Fullers Road; and a wider gully traversing the golf course immediately to the north of the temporary golf club and car park.

The report notes that the site will be affected by overland flow emanating from Beaconsfield Road and the immediate upstream residential properties immediately to the east in Colwell Crescent. Mitigation measures are proposed to divert stormwater away from residences to the east of the site and the clubhouse development. The analysis demonstrates the proposed development will not impact on the current natural flows as they are contained within the natural gully.

The report demonstrates that flooding is not considered to be a constraint that would preclude the use of the site for more intensive purposes in the form of seniors housing. Flood and stormwater management can be appropriately considered and assessed at the development assessment stage.

#### Contamination

Preliminary stage 1 and stage 2 environmental site assessments identified an elevated concentration of lead in one of the samples and encountered fibre cement fragments containing asbestos on the ground surface in the south section of the site.

The assessments concluded that the site can be made suitable for the proposed development provided the prescribed recommendations outlined in the stage 2 environmental site assessment are implemented to address the data gaps and characterise the risks.

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<sup>2</sup> Inundation of normally dry land occurring when water overflows the natural or artificial banks of a stream, river, estuary, lake or dam [https://www.ses.nsw.gov.au/media/2248/land\\_use\\_guidelines.pdf](https://www.ses.nsw.gov.au/media/2248/land_use_guidelines.pdf)

It is therefore considered that this issue is capable of being addressed appropriately at the development application stage.

#### Geotechnical hazards

A geotechnical investigation provided with the application makes recommendations on site stability, excavation conditions, retaining walls, footings, on-grade floor slabs and external pavements.

No geotechnical issues were identified by the investigation that would preclude the issuing of an SCC and it is considered that these matters can be suitably addressed at the development application stage.

#### Acid sulfate soils

The site contains class 5 acid sulfate soils as identified in the Willoughby LEP 2012. The proposed development includes excavation to depths greater than 5m below natural ground. The geotechnical report submitted with the SCC application indicates that an acid sulfate soils management plan is required to be prepared by a suitably qualified geotechnical engineer at the development assessment stage and existing soil conditions would not preclude the proposed development.

#### Flora and fauna

A flora and fauna study was prepared by Travers Ecology. The site contains 45 trees and the proposal retains 17 trees while removing 28 trees mostly due to the excavation works encroaching into the tree protection zones. The trees to be removed are not remnant or self-sown, with most species identified as either endemic natives or exotics. The study concludes there are no significant impacts on threatened flora and fauna species, endangered ecological communities and populations.

Council's comments note that the proposal is on land already developed and does not have high biodiversity values. However, the green open space of the course, including trees and landscaping, is a significant element of the local green network. Council requests that any SCC include a statement that no further incursions into the green open space of the golf club will be entertained. The application provides a defined boundary for the proposed development (in association with the clubhouse redevelopment) and the site description must be clearly stated on any SCC.

#### Bushfire risk

The subject site is identified on Council's mapping of bushfire-prone land. A preliminary bushfire constraints assessment prepared by Travers Bushfire and Ecology identifies the asset protection zone requirements and establishes the required building setbacks and the available area for the development of habitable dwellings on the site.

The assessment confirms that the proposed development is compatible with the requirements of *Planning for Bushfire Protection 2006* and AS 3959 'Construction of buildings in bushfire-prone areas'. It is considered that these matters can be appropriately addressed at the development application stage.

#### Heritage

The Willoughby LEP 2012 heritage map indicates that neither the subject site nor any adjoining sites are identified as heritage items or a heritage conservation area. The site is not a known archaeological site or an Aboriginal place of heritage significance as supported by the Aboriginal heritage due diligence assessment prepared by Travers Bushfire and Ecology.



**2. The impact that the proposed development is likely to have on the uses that, in the opinion of the panel, are likely to be the future uses of that land (clause 25(5)(b)(ii))**

The subject land is zoned RE2 Private Recreation and has been occupied by Chatswood Golf Club (CGC) Limited since 1935. The site contains an 18-hole golf course and a clubhouse and associated facilities.

Watermark Chatswood Pty Ltd and the golf club established a joint venture in 2016 to revitalise the facilities to ensure the long-term sustainability and ongoing viability of the club and golf course. The proposed development provides financial longevity for the site by supporting the viability of the existing use.

To ensure the compatibility of uses across the golf course, proposed safety mitigation measures have been prepared by golf course architect Kruse Golf, including setbacks, fencing, architectural screens, safety netting, and landscape plantings on the interface between the golf course and the development site.

Clause 23 of the Seniors Housing SEPP requires the consent authority of a development application to not consent to a development of land that is used for the purposes of a registered club unless the authority is satisfied there is an acceptable level of separation of club and residential uses. While it is acknowledged the proposed scheme design illustrates the new club premises will be adjacent to new seniors housing development, there is some level of separation between these two uses and this can be further resolved through detailed design of the proposal as part of any development application.

**3. The services and infrastructure that are or will be available to meet the demands arising from the proposed development (particularly, retail, community, medical and transport services having regard to the location and access requirements set out in clause 26) and any proposed financial arrangements for infrastructure provision (clause 25(5)(b)(iii))**

The site is near established services and infrastructure including retail, community and medical services and transport services.

Location and access to facilities

The subject land is near the Lane Cove town centre (1.5km), which provides a range of retail, community and medical services including supermarkets, medical centres, a post office, a library, Council chambers and an aquatic leisure centre within a short commute by public transport. Medicare centres are located in Chatswood and Lane Cove, and North Shore Private Hospital and Royal North Shore Hospital are approximately 5km south-east of the subject site.

Traffic and transport services

An access review prepared by Funktion Access Consultants confirms the proposal complies with clause 26 of the Seniors Housing SEPP as a regular public bus service route and bus stops are within 400m of the site and this service provides direct links to local facilities and services. The proposal confirms that the footpath appears to comply with the functional gradients, and uneven portions of the footpath will need to be upgraded. This matter can be reviewed more closely as part of the detailed design of the proposal and submitted and addressed as part of the development application.

A traffic and parking impact statement considered the road and traffic conditions, the availability of public transport, vehicle arrangements, parking provision, traffic

generation and impacts. The concept design provides 150 car parking spaces, which exceeds Council's car parking requirements. The proposal also provides 145 car spaces at basement level for the new club facility. Parking requirements can be confirmed at the development application stage.

The traffic report noted that the proposed development inclusive of the clubhouse would have the potential to generate an additional 87 AM peak vehicle trips and 102 PM peak vehicle trips over the existing facility. The peak traffic generation of the seniors living component will not coincide with the AM peak hour traffic generation for both components of the development including the clubhouse, which is considered to have a negligible impact on the existing traffic generation of the locality.

Council raised concerns over the site's limited access and egress, with the potential for a significant bottleneck in emergency situations. The traffic report assessed post-development traffic conditions along Beaconsfield Road and associated intersections and concluded that these will provide satisfactory operating conditions with no unacceptable impacts. An emergency and evacuation plan included with the SCC application is consistent with the NSW Rural Fire Service guidelines. It is therefore considered that these matters can be addressed appropriately at the development application stage.

#### Servicing

An infrastructure services report prepared by Marchese Partners concludes that water, gas, electricity, communications and sewer infrastructure is close by and has adequate capacity to service the subject site pending final approval from the relevant authorities and services providers. It is considered that matters regarding provision, capacity and/or augmentation of services can be confirmed at the detailed design/development application stage.

#### **4. In the case of applications in relation to land that is zoned open space or special uses—the impact that the proposed development is likely to have on the provision of land for open space and special uses in the vicinity of the development (clause 25(5)(b)(iv))**

The site is zoned RE2 Private Recreation and is not available for use as 'public open space' but does form part of an extensive network of green space. The proposal will have no impact on nearby public spaces such as O.H Reid Reserve next to the site. The proposal will maintain most of the open space across for the proposal, none of which will be impacted by the proposed seniors housing development. The proposal will also seek to provide additional and new private open space on the site for future senior residents and visitors.

The proposal is considered to have no detrimental impacts on the provision of land for public open space or special uses given the availability of recreational areas/facilities on-site and in the vicinity. The proposal will retain the 18-hole golf course for private recreational use.



**5. 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 (clause 25(5)(b)(v))**

The indicative design for the seniors housing development comprises two five-storey seniors living buildings (Block A and Block B) separated by the four-storey clubhouse building in the centre of the development. The architectural design statement included with the application states that the building envelope has been positioned to step down in alignment with the escarpment to allow for a building form that reflects the natural topography of the site. This design minimises the perceived height of the proposed buildings and while seeking to maintain views from the adjacent properties to the east over the golf course site (Figure 10).

The proposed built form of the development from levels 3–5 demonstrates acceptable separation between the clubhouse and the northern and southern blocks to reduce perceptions of significant bulk and scale. The SCC application notes the visible separation between all buildings assists in breaking up the mass and provides a built form that allows for solar access and good sightlines to the golf course and Lane Cove National Park. Additionally, the suggested separation between the proposed development and existing residential development to the east will help to minimise impacts arising from the construction, built form and operation of the development.

The temporary club and parking are immediately adjacent to residential properties on Mooney Street. While proposed as part of the redevelopment, these are ancillary parts of the development and are not for the purposes of seniors housing. Impacts associated with these components of the overall development will need to be assessed on their own merits as part of any development application.

While the proposal's five-storey height of buildings contrasts with the predominant one-storey and two-storey development in surrounding residential areas, given the slope of the site and the integration of proposed development with the topography, the proposal will be below the ground level of adjacent dwellings, and the impacts of the development with regard to scale, bulk and separation are considered to be acceptable. The final design details can be adequately considered and determined at the development application stage.

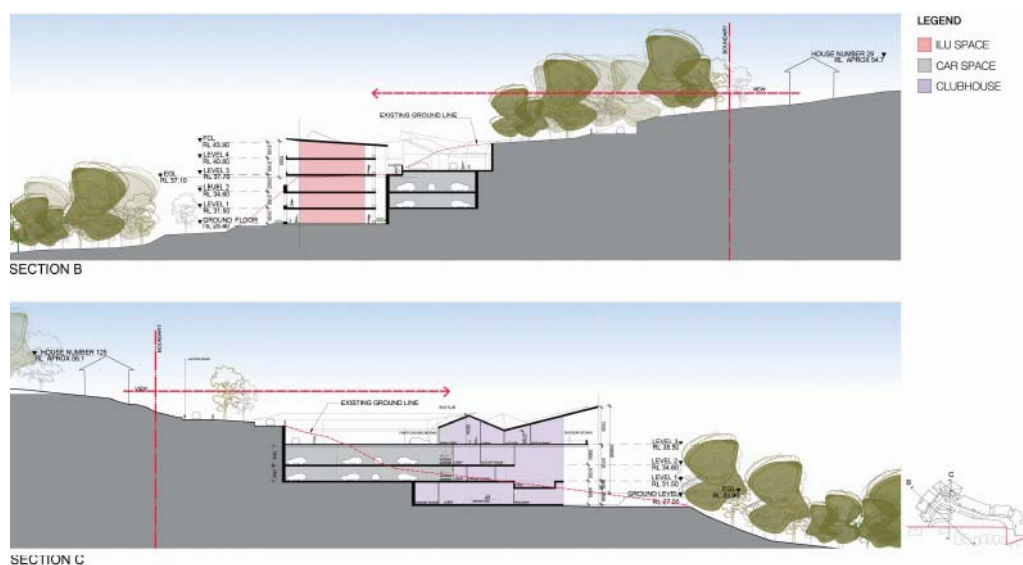


Figure 10: Section drawings from the proposed architectural scheme (source: Marchese Partners).

**6. If the development may involve the clearing of native vegetation that is subject to the requirements of section 12 of the *Native Vegetation Act 2003*—the impact that the proposed development is likely to have on the conservation and management of native vegetation (clause 25(5)(b)(vi))**

While the *Native Vegetation Act 2003* was repealed on 25 August 2017, this Act was not applicable to land in the Willoughby LGA.

**7. The impacts identified in any cumulative impact study provided in connection with the application for the certificate (clause 25(5)(b)(vii))**

As above, a cumulative impact study is not required for this application. However, the panel may require the applicant to provide a cumulative impact study even if it has not been provided with the application if the panel considers it is necessary for it to be provided to determine whether the land concerned is suitable for more intensive development.

**CONCLUSION**

The Department considers that an SCC should be issued for the site on the basis that:

- the proposed use will assist in providing additional housing choice and opportunities for ageing in place for the seniors population in the Willoughby LGA;
- the site is suitable for more intensive use for the purposes of seniors housing, having regard to the criteria set out in clause 25(5)(b) of the SEPP and more detailed design considerations being undertaken as part of any future development application;
- the proposal will provide seniors housing near public transport, which will help to provide good access to health, retail, banking and other facilities in the area;
- the proposal will not compromise the use of the site as a golf course and will seek to facilitate the provision of a new club premises and additional facilities that will benefit the future senior residents and the local community; and
- matters regarding flooding, acid sulfate soils, traffic and access, and building bulk, scale, setbacks and the proposed configuration of the new club premises with the seniors housing can be addressed and assessed at the development application stage.

To support this, it is recommended that the panel consider requirements in schedule 2 of the SCC that will:

- ensure that height, bulk, scale, setbacks and impacts on adjoining development can be suitably addressed at the development application stage. This includes the need for the development to be compatible with the surrounding environment through the consent authority's assessment of any future development application;
- not create additional built form incursions for the seniors housing development into the green open space of the golf club site, to address Council's concerns that the proposal will potentially result in significant loss of open space; and
- limit the extent of the seniors housing development to that part of the golf club site as shown in the plans submitted with the SCC application and drawn by Marchese Partners.

## **ATTACHMENTS**

Attachments E, I and J – Proponent's proposal documentation

Attachment G – Willoughby Council Comments

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