

SWCPP Ref. No.:	2019WCI023
DA No.:	DA17/0237.03
PROPOSED DEVELOPMENT:	Modifications to Access Driveway Alignment & Landscaping Works - Seniors Housing Development comprising 160 Self-Care Apartments, Related Facilities, Basement Car Parking & Associated Works - Lot 18 DP 128940, Lot 1617 DP 871803,40 - 48 Garswood Road, GLENMORE PARK NSW 2745
APPLICANT:	The Sunshine Property Investment Group
REPORT BY:	Lauren Van Etten, Environmental Planner, Penrith City Council

Assessment Report

Executive Summary

Penrith City Council is in receipt of a modification to an approved Seniors Housing Development comprising 160 Self-Care Apartments, Related Facilities and Basement Car Parking & Associated Works at 40-48 Garswood Road Glenmore Park (Penrith Golf Club).

The subject site is zoned RE2 Private Recreation under the provisions of *Penrith Local Environmental Plan 2010* and development for the purposes of seniors housing (serviced self-care housing) is permitted with development consent under *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* where a Site Compatibility Certificate is issued by the NSW Department of Planning & Environment.

The Sydney Western City Planning Panel previously considered a Development Application for Seniors Housing Development on 25 June 2018. The application was approved by the Panel subject to conditions of consent. The proposed modification application seeks to amend aspects of that development as outlined within the body of this report.

The proposed amended development still has a capital investment value in excess of \$30 million. As such, the Sydney Western City Planning Panel (SWPP) has the function of determining the modification application in accordance with Section 2.12 and 2.15 (previously Section 23G) of the Environmental Planning and Assessment Act 1979 and the Operational Guidelines of the Planning Panel being a section 4.55(2) modification application.

In accordance with Appendix F4 (Notification and Advertising) of Penrith Development Control Plan 2014, the proposed development was advertised in the local newspaper and notified to the owners and occupiers of adjoining and nearby properties. The public exhibition period for the proposal was from 17 September to 1 October 2018 and no submissions were received.

An assessment of the proposed development under Section 2.12, Section 4.15 and Section 4.55(2) of the Environmental Planning and Assessment Act 1979 has been undertaken and the proposal is recommended for refusal.

Site & Surrounds

The Penrith Golf Club site is within the suburb of Glenmore Park, approximately 5km south of the Penrith Central Business District. The site is bounded by Garwood Road to the north, Glenmore Parkway to the south, and The Northern Road to the east. The site generally slopes to the southwest and includes a combination of native and introduced tree species throughout the golf course, none of which are mapped as significant biodiversity.

The Northern Road links to the Western Motorway approximately 300m to the north and The Northern Road is serviced by public transport, notably bus routes 794 and 789.

The greater locality is characterised by a mixture of residential and rural residential uses. Rural Residential properties are located directly to the east within the suburb of Orchard Hills, and directly to the north and south. Low density residential development is located immediately to the west and south-west of the site with the residential suburb of Glenmore Park.

The Northern Road Upgrade works include the subject site. The existing cross over to The Northern Road will be relocated to Glenmore Parkway. The Roads and Maritime Services (RMS) Upgrade Plans show the detailed design of the alignment and a proposed Bus Stop located at the site frontage (Figure 4 and 5). The proposed bus stop is to be located along routes that provide access to Glenmore Parkway Shopping Centre (794) and to Westfield Penrith (789).

A site inspection revealed that the 80m setback to The Northern Road has been filled and all trees have been removed.

Proposal

The applicant seeks approval for the following modifications to the originally approved development:

- (1) Remove the eastern landscaped area (80m) from the application and retain as is, as golf course lands;
- (2) Amendments to the driveway layout, including:
 - (2a) Relocate the driveway leading to Building D so that it runs north-south directly opposite the entry to Parking Area 2 (required due to amendment (1) above);
 - (2b) Provide vehicle access between the driveway and aisles of Parking Area 2 (as per the existing situation); and
 - (2c) Provide vehicle access between the driveway and the southwestern service entry of the existing clubhouse (as per the existing situation).

Plans that apply

- Local Environmental Plan 2010 (Amendment 4)
- Development Control Plan 2014
- State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004
- State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004
- State Environmental Planning Policy (Infrastructure) 2007
- State Environmental Planning Policy No 55—Remediation of Land
- State Environmental Planning Policy No 65—Design Quality of Residential Flat Development
- Sydney Regional Environmental Plan No.20 - Hawkesbury Nepean River

Planning Assessment

- **Section 2.12 – Sydney Western City Planning Panel (SWCPP)**

Under Clause 4.5(b) of the *Environmental Planning and Assessment Act 1979*, the consent authority is a regional planning panel for development that is declared by an environmental planning instrument as regionally significant development. Schedule 7 of *State Environmental Planning Policy (State and Regional Development) 2011*, specifies that development that has a capital investment value (CIV) of more than \$30 million is regionally significant development.

In accordance with 4.5(b) of the *Environmental Planning and Assessment Act 1979*, the Sydney Western City Planning Panel (SWCPP) is the determining authority as the proposal has a CIV over \$30 million and the proposed modifications are considered a 4.55 (2) application.

- **Section 4.15 - Evaluation**

The development has been assessed in accordance with the matters for consideration under Section 4.15 (previously Section 79C) of the *Environmental Planning and Assessment Act 1979*, and having regard to those matters, the following issues have been identified for further consideration:

- **Section 4.55(2) - Other modifications**

The proposed modifications have been assessed in accordance with the matters for consideration under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979*. The proposed modifications do not represent substantially the same development as that originally granted development consent, noting the 80m front setback is no longer heavily vegetated nor is there any landscaping embellishment proposed. The visual impacts as viewed from the Northern Road are now adversely impacted by the amended development which now provides for an unacceptable interface presentation to The Northern Road, contrary to the reasons supporting the original development and support of that development by the Panel.

Section 79C(1)(a)(i) The provisions of any environmental planning instrument

State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

The modified proposal remains compliant with the relevant provisions of the SEPP.

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004

The modified proposal remains compliant with the relevant provisions of the SEPP with the exception of the following clauses:

Part 1A Site Compatibility Certificates

The development is proposed under the provisions of State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, which applies to the subject land by virtue of Clause 25(4)(a) as a Site Compatibility Certificate (SCC) was issued over the site dated 22 June 2018.

Clause 24(1)a((i)), however, specifies that there is a requirement for a site compatibility certificate to accompany a development if seniors housing is not permitted with consent within that land zone, but adjoins land that is zoned primarily for urban purposes. Pursuant to Clause 16 of the SEPP, development for seniors housing may be carried out with consent on any land to which the SEPP applies.

The site compatibility certificate under which the development application was previously approved includes the requirement that the development provide an appropriate buffer to The Northern Road upgrade for visual amelioration purposes. Within the original assessment the Panel was satisfied that the extensive 80m

setback between the car parking adjacent to Block D, which was heavily vegetated, was adequate to satisfy that requirement. However as this setback is no longer vegetated nor proposed to be landscaped the requirement of the certificate is no longer met and a valid Site Compatibility Certificate is not considered to be in effect for this form of proposal. Refer to Clause 33 for further detail.

Part 2 Site-Related Requirements

The proposal is not in accordance with the provisions of the SEPP for seniors serviced self care housing, as detailed below.

Clause 31- Design of in-fill Self-Care Housing

In accordance with Clause 31 of the Seniors Housing SEPP, the design of the proposed development must have consideration of the provisions of the Seniors Living Policy: Urban Design Guideline for Infill Development. The proposal is considered non-compliant with the provisions within the guidelines which intend to respond to context, contribute to streetscape and employ site planning and design principles. More specifically, the 80m setback is not landscaped to complement the surrounding locality and minimize the visual impact, built form, scale and massing of the proposed development.

Clause 33- Neighbourhood Amenity and Streetscape

It is considered that the modified proposal will not create an attractive residential development, which is environmentally sympathetic with the surrounding character. The design is not considered to address the design principles set out in Clause 33 of the Seniors Housing SEPP, with particular discussion regarding the location's character, streetscape and neighbourhood amenity as detailed below.

Character and Neighbourhood Amenity

This clause states that proposals should recognize the desirable elements of the locations current character. It was identified in the Urban Design Review Panel meeting that the character from The Northern Road was rural and rural residential in nature and that the proposed development should be screened from The Northern Road to maintain this existing character. To facilitate this, an 80m setback to the road was originally provided and existing vegetation was to be preserved and also embellished to buffer and screen the scale of the development from the main roads and provide a sense of canopy connection that retain the character of the existing streetscape. While the modified proposal will maintain a buffer distance of 80m from The Northern Road and Glenmore Parkway, it is no longer heavily vegetated nor is it proposed to be landscaped to ameliorate the scale of buildings within the surrounding green space.

Photo montages were submitted, as requested, taken from the east to consider the likely visual impacts of the amended proposal as viewed from The Northern Road. However, they do not provide an accurate representation of what is now proposed. Firstly, it is unclear whether they accurately portray surveyed elements given the scale of the buildings shown relative to the scale of the proposed street trees that are shown. Secondly, given the landscape plan doesn't specify the tree species nor pot size, it is unclear whether the trees depicted are an accurate representation of the intended streetscape and landscape conditions. Lastly, the vegetation removal and replanting that is required by the Roads and Maritime Services in undertaking Northern Road upgrades are not shown which is critical to ascertain the cumulative impacts of works at this point of the site. Despite the inadequacy of the information submitted, it is clear from the lack of vegetation alone and the absence of any proposed landscaping that the rural residential canopy cover will not be maintained. Therefore, the development is no longer appropriately screened to minimise the visual impact upon and, maintain the existing character of the area as viewed from The Northern Road.

The developments highest 4 storey buildings have been located on the eastern side of the site. The views for the proposed residents of the 80m setback is now also considered to adversely affect the occupants

visual amenity and outlook when compared to the current approved development.

It is therefore considered that the modified proposal would have a detrimental visual impact upon the character and amenity of surrounding environment.

Character: Existing and Proposed Vegetation

Clause 33 states that developments shall embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and retain, wherever reasonable, major existing trees. Within the original application, the arborist report stated that all trees within the 80m front setback to the east of the proposed buildings were to be retained. However, the modified proposal excludes this area from the development and therefore excludes this area from adequate tree protection. Moreover, it is noted that the majority of vegetation within this area has been cleared recently without evidence and lawful consent and as a result the modified proposal will not retain major existing trees.

In addition, the previous plan to embellish this 80m with further landscaping is no longer proposed and therefore the combination of existing and proposed vegetation has been substantially reduced, with only trees along the access way remaining, the species of which are not known. Therefore the capacity of the proposed street tree planting to appropriately respond to the character and screen the development is unknown. Further, while the Sydney Western City Planning Panel requested a covenant be imposed to rely upon the landscaping that is proposed along the street, the applicant stated that owner's consent from Penrith Golf Club has not been provided for such a covenant. Therefore, such landscaping cannot be relied upon albeit inadequate in and of itself to screen the setback.

Clause 34 - Visual and Acoustic Privacy

The modified proposal has not been designed to maintain visual and acoustic privacy within the development for the reasons outlined above. The layout of buildings across the site, design of the buildings themselves and the setbacks may remain the same however the provision of landscaping separation between the proposal and the Northern Road will not ensure that privacy within the development is maintained. This is a significant departure from what was deemed suitable and necessary as part of the proceeding determination.

Clause 38 - Accessibility

The modified proposal has not been designed to provide obvious pedestrian links to public transport services nor convenient access as is required. More specifically, the pedestrian path to the bus stop is now convoluted and longer than it was previously.

State Environmental Planning Policy (Infrastructure) 2007

Among other functions, State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure) repeals the former State Environmental Planning Policy No. 11 - Traffic Generating Development and provides for certain proposals, known as Traffic Generating Development, to be referred to NSW Roads and Maritime Services (RMS) for concurrence assessment.

A referral may be required to the RMS but this is dependent on the site's access to a classified road and the proposed intensity of the development. Schedule 3 lists the types of development that are defined as Traffic Generating Development. Residential development in an apartment of residential flat building arrangement is referred if; Includes 300 or more dwellings and has access to any road; and/or Includes 75 or more dwellings and has access within 90m of a classified road.

The modified proposal did not change the access point to the Northern Road, nor change the number of dwellings and therefore no referral to the RMS was required as part of this application.

State Environmental Planning Policy No 55—Remediation of Land

State Environmental Planning Policy No. 55 - Remediation of Land (SEPP 55) aims to provide a framework for the assessment, management and remediation of contaminated land throughout the state. Clause 7(1) of SEPP 55 prevents consent authorities from consenting to a development unless it has considered whether the land is contaminated and is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out.

A site inspection revealed that unauthorised filling and tree removal has occurred within and adjacent the development, alongside The Northern Road and within the 80m setback. The applicant stated that this last was no longer subject to the proposal. However, this land is still within the subject site. More specifically it is situated between the development and the proposed access road to the development and therefore constitutes works without consent. No contamination assessment was provided to address these new fill activities and the applicant has not demonstrated that the site is now suitable as a consequence of those works. Therefore, in accordance with Clause 7 of the *SEPP No. 55 Remediation of Land*, Council is not satisfied that the land as modified is suitable for the proposed use.

State Environmental Planning Policy No 65—Design Quality of Residential Flat Development

State Environmental Planning Policy No. 65 – Design Quality of Residential Flat Development (SEPP 65) aims to improve the design quality of residential flat buildings of three or more storeys and containing four or more self-contained dwellings. The 48 independent living units are self-contained and therefore require compliance with this policy. SEPP 65 contains ten design quality principles which form the basis for achieving good design and provide a guide for evaluating the merits of development proposals.

The proposed development is consistent with the aims and objectives of SEPP 65 with the exception of contributing to the streetscape.

An assessment has been undertaken of the proposed development in relation to the ten design quality principles and the related Apartment Design Guide. However the development is now inappropriate in terms of the context and character, built form and scale and landscaping given the removal of existing vegetation and reduction in landscape embellishments within the setback to The Northern Road which will not complement the existing natural features of the site and contribute to the building's setting.

Sydney Regional Environmental Plan No.20 - Hawkesbury Nepean River

The modified proposal remains in accordance with the general planning considerations set out in SREP 20 as well as relevant specific planning policies and related recommended strategies contained in SREP 20. Notwithstanding, the proposal has not demonstrated that the subject site can adequately accommodate the proposed development and is recommended for refusal.

Local Environmental Plan 2010 (Amendment 4)

Provision	Compliance
Clause 2.3 Permissibility	Does not comply - See discussion
Clause 2.3 Zone objectives	Complies
Clause 7.1 Earthworks	Does not comply - See discussion
Clause 7.4 Sustainable development	Complies
Clause 7.6 Salinity	Complies
Clause 7.7 Servicing	Complies

Clause 2.3 Permissibility

The subject site is zoned RE2 Private Recreation under the provisions of *Penrith Local Environmental Plan 2010* and development for the purposes of seniors housing (serviced self-care housing) is permitted with development consent under *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* where a Site Compatibility Certificate is issued by the NSW Department of Planning & Environment.

Clause 7.1 Earthworks

As detailed within the discussion under SEPP 55, Council has insufficient information regarding the quality and source of any fill material that has been brought on site. Therefore the modified proposal cannot achieve the objectives of this clause namely to ensure earthworks have not had a detrimental impact on environmental functions and processes, or neighbouring uses (specifically future occupants of the seniors development). The modified proposal is therefore inconsistent with the aforementioned objectives of this clause.

Section 79C(1)(a)(iii) The provisions of any development control plan

Development Control Plan 2014

Provision	Compliance
C1 Site Planning and Design Principles	Does not comply - see Appendix - Development Control Plan Compliance
C2 Vegetation Management	Does not comply - see Appendix - Development Control Plan Compliance
C3 Water Management	Complies
C4 Land Management	Does not comply - see Appendix - Development Control Plan Compliance
C5 Waste Management	Complies
C6 Landscape Design	Does not comply - see Appendix - Development Control Plan Compliance
C7 Culture and Heritage	N/A
C8 Public Domain	N/A
C9 Advertising and Signage	N/A
C10 Transport, Access and Parking	Complies
C11 Subdivision	N/A
C12 Noise and Vibration	Complies
C13 Infrastructure and Services	Complies
D2.1 Single Dwellings	N/A
D2.2. Dual Occupancies	N/A
D2.3 Secondary Dwellings	N/A
D2.4 Multi Dwelling Housing	N/A
D2.5 Residential Flat Buildings	Does not comply - see Appendix - Development Control Plan Compliance
D2.6 Non Residential Developments	N/A

Section 79C(1)(a)(iv) The provisions of the regulations

Subject to compliance with the relevant conditions of consent, the modified development remains compliant with the relevant requirements of the Regulations.

Section 79C(1)(b)The likely impacts of the development

The proposed modifications will alter the following likely impacts of the development as identified in the original assessment report for the proposal:

Urban Design and Rural Character

The character of the area as viewed from The Northern Road will be substantially altered as there is no longer an appropriate landscaped buffer between the development and the road as in the original proposal. Refer to the discussion against SEPP (Housing for Seniors or People with a Disability) 2004 for further details.

Contamination and Pollution

As the proposal does not account for the source of unauthorized fill, the modified proposal does not ensure the landfill utilises appropriate materials that do not result in pollution or contamination of land or water on a site.

Accessibility

The modified proposal does not provide a suitable accessible pathway as defined within the SEPP (Housing for Seniors or People with a Disability) 2004 and discussed within this section of the report.

Section 79C(1)(c)The suitability of the site for the development

The modified proposal is no longer considered suitable for the modified site as it is not in accordance with the previously issued Site Compatibility Certificate requirements listed under Schedule 2, namely that an appropriate landscape buffer be provided to The Northern Road for visual amelioration purposes. The proposed design is inappropriate for the site as it does adequately respond to the character of the locality.

Section 79C(1)(d) Any Submissions

Community Consultation

The development application was advertised in the local newspaper and notified to owners and occupiers of adjoining and nearby properties pursuant to the requirements of the Regulations and in accordance with Council's Development Control Plan. Affected property owners and occupiers were notified in the surrounding area and invited to make a submission on the proposal during the exhibition period from 17 September 2018 to 1 October 2018. During this period, no submissions were received in response.

Referrals

The application was referred to the following stakeholders and their comments have formed part of the assessment:

Referral Body	Comments Received
Traffic Engineer	No objection

Section 79C(1)(e)The public interest

The modified proposal has been assessed to be contrary to the primary aims, objectives and controls of the applicable planning instruments and will result in negative and unacceptable impacts in the locality and as such, support of the proposal would not be in the public interest.

Conclusion

The modified proposal has been assessed against the applicable plans and policies and against Section 2.12, Section 4.15 and Section 4.55(2) and is found to be unacceptable. The design of the development is incompatible with the character of the local area particularly having regard to landscaping. Further, the proposal has not demonstrated compliance with the relevant legislation regarding site suitability and accessibility and is therefore not worthy of support. The development application is recommended for refusal.

Recommendation

That DA17/0237.03 for the modification to an approved Seniors Housing Development comprising 160 Self-Care Apartments, Related Facilities and Basement Car Parking & Associated Works at 40-48 Garswood Road Glenmore Park be refused for the following reasons.

CONDITIONS

Refusal

- 1 The application is not satisfactory for the purpose of Section 4.55(2)(b) of the Environmental Planning and Assessment Act as the application has not demonstrated the development is substantially the same as the development for which consent was originally granted due to the extent of tree removal and exclusion of landscaping from the proposal.

- 2 The application is not satisfactory for the purpose of Section 4.15(1)(a)(i) of the *Environmental Planning and Assessment Act 1979* as the proposal is inconsistent with the following provisions of:
 - a) State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004**
 - Clause 24- Suitable Site compatibility certificate and development compatibility
 - Clause 31 - Design of in-fill self-care housing.
 - Clause 33 - Neighbourhood amenity and streetscape
 - Clause 36 - Stormwater
 - Clause 38 - Accessibility.

 - b) State Environmental Planning Policy No 55- Remediation of Land**
 - Clause 7 Contamination and remediation to be considered in determining development application.

 - c) State Environmental Planning Policy No 65- Design Quality of Residential Apartment Development**
 - 28(2)(b) Determination of development applications principle 1 (context and neighbourhood character), principle 2 (built form and scale) and principle 5 (landscape).

 - d) Penrith Local Environmental Plan 2010:**
 - Clause 7.1 - Earthworks- The proposal is inconsistent with the objectives of the Earthworks clause, specifically:
 - i) *to ensure that earthworks for which development consent is required will not have a detrimental impact on environmental functions and processes.*

- 3 The development application is not satisfactory for the purpose of Section 4.15(1)(a)(iii) of the *Environmental Planning and Assessment Act 1979* as the proposal is inconsistent with the following provisions of the Penrith Development Control Plan 2014:
- (i) The amended proposal is not considered to comply with Section C1 'Site Planning and Design Principles', specifically:
 - The proposed development is inconsistent with the bulk and scale and landscaped character of the surrounding area.
 - (ii) The amended proposal is not considered to comply with Section C2 'Vegetation Management', specifically:
 - The siting and layout of development has not considered the location of trees and favored their retention on the subject property despite their contribution to the character of the area.
 - The proposal does not provide mechanisms for the long term protection management and maintenance of any proposed trees and vegetation.
 - (iii) The amended proposal is not considered to comply with Section C4 'Land Management' as
 - The proposal does not justify the use of landfill.
 - The proposed does not ensure the landfill utilises appropriate materials that do not result in pollution or contamination of land or water on a site.
 - (iv) The amended proposal is not considered to comply with Section C6 'Vegetation Management', specifically:
 - The developments does not reinforce vegetation patterns nor enhance the amenity and visual quality of the site given the building elements are not screened within their setting as viewed from The Northern Road.
 - v) The amended proposal is not considered to comply with Section D2.5 'Residential - Residential Flat Buildings specifically:
 - The development does not meet the objectives for front setbacks to allow for the development of flora and fauna corridors.
- 4 The amended proposal is not considered to comply with Section 4.15(1)(b) of the *Environmental Planning and Assessment Act 1979* in terms of the likely impacts of the development including those related to:
- (i) negative streetscape and rural character impacts;
 - (ii) landscaping;
 - (iii) accessibility; and
 - (iv) potential contamination.
- 5 The application is not satisfactory for the purpose of Section 4.15(1)(c) of the *Environmental Planning and Assessment Act* as the site is not suitable for the scale of the proposed development. This includes the unauthorised earthworks and tree removal associated with the proposal.
- 6 Based on the above deficiencies and submissions received, approval of the development would not be in the public interest pursuant to Section 4.15(1)(e) of the *Environmental Planning and Assessment Act 1979*.

Appendix - Development Control Plan Compliance

Development Control Plan 2014

Part C - City-wide Controls

The modified proposal is inconsistent with Section C1.2.3 which requires that bulk and scale shall have minimal negative impacts on an area's landscape and character taking into account the surrounding landscape and setbacks should maximise deep root planting areas to reduce visual impacts and scale.

The proposed modifications are inconsistent with Section C2.1 which states that development should protect and enhance native and non-native vegetation in accordance with the visual identity of the landscape, nor are there mechanisms for the long term protection management and maintenance of any proposed trees and vegetation within the 80m setback as required. The application has not demonstrated compliance with the requirements under Section C4 'Land Management' as the proposal does not account for the source of unauthorized fill through a landfill validation report as C4.2 requires. Therefore, the modified proposal does not justify the use of landfill nor ensure the landfill utilises appropriate materials that do not result in pollution or contamination of land or water on a site.

The landscape design does not reinforce vegetation patterns nor enhance the amenity and visual quality of the site given the building elements are not screened within their setting as viewed from The Northern Road. Therefore the proposal is inconsistent with the related objectives of Section C6.1.3.

D2 Residential Development

The primary development controls relating to the development of this site are contained within the residential chapter of the DCP. An assessment of the application has been undertaken and, on balance, the modified proposal is consistent with the relevant provisions with the exception of the landscape area and front setback objective to provide for flora/fauna corridors (Section 2.5.5 and 2.5.6). It is also noted that the SEPP for Seniors prevails in the event of inconsistencies and further discussion regarding landscape character can be found in this section of the report.