

Statement of Environmental Effects

68-74 Deepwater Road, Castle Cove

Submitted to Willoughby City Council

On behalf of Castle Cove Country Club Limited and Taylor
Developments Group



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

By using the green and blue colours to represent NSW, this painting unites the contrasting landscapes. The use of green symbolises tranquillity and health. The colour cyan, a greenish-blue, sparks feelings of calmness and reminds us of the importance of nature, while various shades of blue hues denote emotions of new beginnings and growth. The use of emerald green in this image speaks of place as a fluid moving topography of rhythmical connection, echoed by densely layered patterning and symbolic shapes which project the hypnotic vibrations of the earth, waterways and skies.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

In supporting the Uluru Statement from the heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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15 December 2023

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Version No.

Date of issue

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1.0 (DRAFT)

11/10/2023

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3.0 (FINAL)

15/12/2023

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I.	BASIX Statement of Compliance	JHA
J.	Consultation Outcomes Report	Ethos Urban
K.	Access Assessment Report	Jensen Hughes
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V.	Operational Plan of Management	<i>Castle Cove Golf Club</i>
W.	BCA Report	<i>Jensen Hughes</i>
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CC.	Apartment Design Guide Compliance Table	<i>Antoniades Architects</i>
DD.	Legal Advice Letter	<i>Mills Oakley</i>

Executive Summary

Purpose of this Report

This submission to the Willoughby City Council (Council) comprises a Statement of Environment Effects (SEE) for a Development Application (DA) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It relates to the demolition and redevelopment of the Castle Cove Country Club and the construction of Independent Living Units (ILUs) located at 68-74 Deepwater Road, Castle Cove.

Project Overview

The Development Application (DA) seeks consent for the detailed design and construction of a new clubhouse in addition to a seniors housing development. Specifically, the proposed development will comprise the following works:

- Demolition of the existing golf clubhouse and car park;
- Subdivision of current Lot 1 in DP 610360 and Lot 510 in DP200636 into proposed lots 1 and 2 (inclusive of easements);
- Construction of a two (2) storey new golf clubhouse, comprising:
 - Ground floor carpark comprising 76 spaces and one (1) loading zone; and
 - First floor comprising a foyer; dining lounge; kitchen and service area; pro-golf shop; club administration area and meeting room; male/female changing rooms and toilet facilities; terrace dining and golf buggy and cart storage cages.
- Construction of a part two (2) and three (3) storey building for Independent Living Units (ILUs) comprising:
 - Three (3) two bedroom and 14 three bedroom units; and
 - Two (2) level basement car parking containing 26 spaces, one (1) bus zone and one (1) loading zone.
- Associated landscaping.

The Castle Cove Country Club Ltd (the Club) has been in existence for over 80 years and has flourished and developed over that time. Equally it has faced many challenges and changes in order to remain relevant to its members and the local community. In the last 30 or more years, the club has taken various measures to secure its long term viability in response to falling memberships, more challenging financial conditions and cost containment, and the need to stay relevant to stakeholders.

The Club has therefore partnered with Taylor Developments Group (Taylor) in a joint venture to undertake a transformative redevelopment that secures the financial longevity of the Club and creates a quality development outcome – providing an improved golf clubhouse offering to existing members, potential new members from the senior's living development, and the local Castle Cove community.

The Site

This DA relates to the site located at 68-74 Deepwater Road, Castle Cove, within the City of Willoughby Local Government Area (LGA). The site extends north-east from Deepwater Road and is immediately adjacent to Castle Cove Golf Course. It is irregular in shape, narrowing towards the centre of the site and including steep and undulating topography including rock platforms. The site is approximately 5,723m² and is legally described as Lot 1 DP610360. A separate Lot 510 in DP200636 of only 16.42m² is also located on the site's Deepwater Road frontage.

The site currently comprises a part 2 and 3 storey clubhouse building and hard stand car park at the rear of the site and an at-grade hard stand car park fronting Deepwater Road (see **Figure 2** below) and is privately owned by the Club. The golf course land adjoining the site to the west and north-west is owned by Council and is not part of the project site. Opposite and to the east of the site along Deepwater Road are detached dwelling houses, and to the north and east of the site, are detached dwellings and a separate seniors housing development (12 Amaroo Avenue) (under construction) with access from Amaroo Avenue. It is noted that this application is not proposing any access from Amaroo Avenue.

Strategic Context

The proposed development is consistent with the relevant State, district and local strategic plans, in that it will increase the supply and diversity of housing for seniors in the Willoughby LGA whilst renewing a community asset that promotes recreation and associated health benefits, and social interaction amongst neighbours and the wider community. The proposal seeks to address the site's potential for additional seniors housing (ie for 60

years and over residents) and to deliver an improved built form outcome on the site, together with providing significant improvements to the golf clubhouse offering. The proposal is consistent with the overarching themes and objectives of relevant plans, policies and guidelines, which include:

- NSW Government Greater Sydney Region Plan;
- NSW Government North District Plan;
- Willoughby City Local Strategic Planning Statement 2020; and
- Willoughby Housing Strategy 2036.

These strategies highlight the need to plan for housing and services for an ageing population in Willoughby LGA. The North District Plan recognises the large proportion of growth in older people to 2036, with an anticipated 47% increase in people aged 65-84 years and an 85% increase in the 85+ year age group. This equates to 20% of the District's population being aged 65 years and over, up from 16% in 2016. The Council's Willoughby Housing Strategy similarly identifies that those within retirement age groups (60 and above) will make up a large portion (43%) of the expected population increase of Willoughby LGA to 2036.

Statutory Context

The site is zoned R2 Low Density Residential under the *Willoughby Local Environmental Plan 2012* (Willoughby LEP 2012). The new clubhouse (defined as a registered club) and the subdivision are permissible under the Willoughby LEP 2012. Seniors housing is permissible under the State Environmental Planning Policy - Housing 2021 (Housing SEPP). This State Policy encourages increased supply and more diverse forms of seniors housing than may be permitted in council LEPs in order to meet the needs and expectations of an ageing population. The Housing SEPP contains detailed requirements for ensuring that purpose built seniors housing developments provide for people to remain living independently and to "age-in-place" in their communities, through quality design and accessibility measures both external and internal to the apartments (eg. level accesses, lifts, and larger internal spaces such as wider corridors and larger bathrooms).

Consultation and Engagement

Consultation has been undertaken through a range of engagement activities with stakeholders including neighbouring and local residents, landowners, community groups, golf club members, elected representatives and the Council. Feedback from the community and stakeholders informed evolution of the proposal. The key feedback raised during the consultation process included comments on the bulk and scale of proposal being suitable in its context, support for key design features, desire for a high level of communications during construction and an expectation that the club would continue to work with the local community on anticipated operational impacts such as traffic, parking and noise.

A Community Survey was also conducted as part of the pre-lodgement consultation process, and included the following key findings:

- 90% of respondents agree or strongly agree that the Castle Cove Country Club clubhouse needs significant repair or improvement;
- 86% of respondents agree or strongly agree that it is important that the Club survives and operates into the future;
- 86% of respondents would visit the new clubhouse to dine with family or friends, 51% would visit the clubhouse before or after a game of golf/tennis, and 38% would use the spaces for meetings or gatherings; and
- 60% of respondents would use a clubhouse bookable space.

The outcomes of the consultation process have been considered in the final design of the project and a full engagement outcomes report is provided in **Appendix J**.

Environmental Assessment

The proposal has been informed by an urban design analysis with input from other technical studies and reports (**Table of Contents**). This SEE provides an assessment of the environmental considerations of the project in accordance with the pre-development application meeting with Council and sets out the undertakings made by the Proponent to manage and minimise potential impacts arising from the proposal. The key environmental matters identified include:

- Urban design and built form;
- Residential amenity;
- Arboricultural impacts;
- Access;

- Waste management;
- Noise impacts;
- Bushfire;
- Utilities and servicing;
- Traffic and parking;
- Waste management; and
- Social and economic impacts in the locality.

The proposed development has been assessed in each of these instances by technical experts across a range of disciplines as guided by industry best practice. These assessments confirm that while there may be potential impacts resulting from the change of the existing conditions on the site, these can be appropriately managed and mitigated.

On balance, the proposed development is considered to be in the public interest and will not result in any social, economic and environmental impacts that cannot be appropriately managed through the identified mitigation measures and conditions of consent.

Conclusion and Justification

Having regard to environmental, economic, and social considerations, the carrying out of the project is justified for the following reasons:

- The proposal will facilitate the redevelopment of the site to include the purpose of seniors housing, which will deliver important social and economic benefits to the community by contributing to housing diversity for the increasingly elderly population;
- The redevelopment of the clubhouse will help secure its longevity and will also provide a greatly improved offering to members and the wider Castle Cove community. Renewal of the clubhouse will also ensure the golf course remains a well-maintained, high quality green space for the local area;
- The proposed contemporary and modern built form and urban design will significantly contribute to the streetscape of Deepwater Road and surrounding developments;
- The proposed development provides a high quality architectural design that provides a contextual response to the immediate area;
- The proposed development is consistent with the aims and objectives of the relevant strategic planning framework, particularly the North District Plan and the Willoughby City Local Strategic Planning Statement by increasing the supply of seniors housing commensurate to forecasted demand within the LGA in addition to providing upgrades to greatly valued community asset; and
- The assessment of the proposal has demonstrated that the development will not result in any environmental impacts that cannot be appropriately managed and consistent with the relevant planning controls for the site.

This SEE has been undertaken in accordance with the EP&A Act and confirms the project is consistent with all statutory requirements and that the potential impacts are acceptable and are able to be managed through compliance with the identified mitigation measures and merit based justification. It makes a vital contribution to the renewal of an important community space and additional seniors housing within the local community. It is consistent with the statutory planning framework and will not give rise to any unreasonable environmental impacts.

1.0 Introduction

This Statement of Environmental Effects (SEE) is submitted to Willoughby City Council (Council) on behalf of Castle Cove Country Club Limited and Taylor Development Group (the proponent), in support of a Development Application (DA) for the demolition and redevelopment of the Castle Cove Country Club and the construction of Independent Living Units located at 68-74 Deepwater Road, Castle Cove.

Specifically, the proposed scope of works in this DA includes:

- Demolition of the existing golf clubhouse and car park;
- Subdivision of current Lot 1 in DP 610360 and Lot 510 in DP200636 into proposed lots 1 and 2 (inclusive of easements);
- Construction of a two (2) storey new golf clubhouse, comprising:
 - Ground floor carpark comprising 76 spaces and one (1) loading zone; and
 - First floor comprising a foyer; dining lounge; kitchen and service area; pro-golf shop; club administration area and meeting room; male/female changing rooms and toilet facilities; terrace dining and golf buggy and cart storage cages.
- Construction of a part two (2) and three (3) storey building for Independent Living Units (ILUs) comprising:
 - Three (3) two bedroom and 14 three bedroom units; and
 - Two (2) level basement car parking containing 26 spaces, one (1) bus zone and one (1) loading zone.
- Associated landscaping.

This SEE has been prepared by Ethos Urban on behalf of Castle Cove Country Club Limited and Taylor and is based on the Architectural Plans provided by Antoniades Architects (see **Appendix A**) and other supporting technical information appended to the report (see **Table of Contents**).

This SEE describes the site, its environs, and the proposed development, and provides an assessment of the environmental impacts and identifies the steps to be taken to protect or lessen the potential impacts on the environment matters for consideration under section 4.15(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

1.1 Background

1.1.1 Project Need

While the Club has flourished and evolved over the years, it has also faced challenges to remain relevant and viable to both its members and the local community. The Club is in need of essential improvements and maintenance to the clubhouse.

Redevelopment of the Club will help secure the longevity of the Club and will also provide a greatly improved offering to members and the wider Castle Cove community. Renewal of the Club will also ensure the golf course remains a well-maintained, high quality green space for the local area.

There is a recognised need for seniors housing across Greater Sydney and in particular in the locality for seniors aged 60 and over who are less able, who are wishing to downsize, be close to family, or be close to the golf course and other club amenities.

It should be noted that there will be no changes to the golf course itself. The new clubhouse and independent living units will be contained to the clubs privately owned land on the existing clubhouse and car park site.

Project Vision

The Club's vision is to revitalise the CastleCove Country Club as a thriving, welcoming hub where people come to be active, enjoy the outdoors and connect with each other, as part of an integrated community that can support the long term financial sustainability of the not-for-profit Club.

Delivering this vision will realise valuable benefits for the local community and members, including:

- A new well-designed clubhouse with better indoor and outdoor spaces, pro shop and golf club facilities
- A new dining experience for all, alongside better parking facilities and seamless accessibility
- Independent housing options for senior residents who wish to maintain their connection to the local community.

1.1.2 Previous Scoping Proposal

In 2021 the proponent undertook preliminary planning for the potential rezoning of the site to accommodate an earlier iteration of the proposed development. In 2022 this was translated into a Scoping Report which was informed by community consultation that had occurred prior and informed key stakeholders of the project, including the overall vision and principles for the redevelopment of the site. Preliminary engagement included:

- Letterbox drops on 21 June 2021 and 1 July 2021 to encourage engagement from the local community, including the promotion of online surveys to solicit feedback from identified local residents, business owners and club members;
- Online* information session on 29 June 2021 for members of the Castle Cove Country Club and non-members to communicate an overview of the project, the vision for the project and the status of the project;
- Online* workshop on 30 June 2021 for neighbouring residents, to provide an overview on the proposed redevelopment of the Castle Cove Country Club and to seek feedback from residents on the draft vision and principles for the project;
- Online* meeting on 7 July 2021 to inform local real estate professionals of the proposed redevelopment. During this meeting, attendees were invited to provide feedback regarding the draft vision and potential community benefits;
- Email to Castle Cove Public School on 20 July 2021, to inform about the proposed redevelopment of the Castle Cove Country Club and to invite key actors within the school community to a briefing with the project team; and
- Online* meeting on 11 August 2021 with key actors from the Castle Cove School community to provide an update on the proposed redevelopment of the Castle Cove Country Club, consultation process and to seek feedback on the draft vision and principles and community needs.

*Consultation conducted online were due to COVID-19.

The scheme that followed the community consultation comprised a part 4-storey part 5-storey development, comprising a café, function spaces; health and wellness centre and golf pro shop as well as 53 ILUs and associated amenities. To facilitate this previous rezoning proposal, the proponent sought with Willoughby City Council to amend the following controls of the Willoughby Local Environmental Plan 2012 (Willoughby LEP 2012) via a planning proposal, including:

- Amending the floor space ratio (FSR) to a maximum from 0.4:1 to 1.34:1;
- Amending the land use zoning across the site from R2 Low Density Residential Zoning to the R3 Medium Density Residential Zone; and
- Amending the maximum building height from 8.5m to RL 91.6m.

A pre-planning proposal lodgement meeting was held on 13 April 2022 with Council and the Proponent's project team. The main issues raised by Council in relation to the development and the proposed Willoughby LEP 2012 amendments were related to:

- The proposed bulk and scale of development being unsympathetic to the surrounding locality;
- The amendment to the land and height zoning under the Willoughby LEP 2012 which would have established an undesirable precedent;
- Insufficient provision for the anticipated traffic generation and parking space numbers and;
- Impacts on surrounding natural environment including bushfire mitigation, contamination, the removal of vegetation, relocation of the tennis court and excavation/ landscape alterations.

Since the pre-planning proposal meeting with Council in 2022, the Proponent's project team have reviewed the scheme to reduce the height, scale and intensity of the development and as a result are no longer seeking to pursue a planning proposal.

1.1.3 Pre-DA Lodgement Meeting

A pre-DA meeting was held on 23 August 2023 with Council and the Proponent's project team where a revised scheme was presented responding to the initial concerns of the planning proposal in the form of a DA. The

matters raised by Council and a response to how these have been addressed in this DA are included in **Table 1** below.

Table 1 *Response to issues raised from pre-development application meeting*

Council comment	Response
<p>State Environmental Planning Policy (Resilience and Hazards) 2021</p> <p>A preliminary and detailed site investigation (contamination) report must be submitted with the Development Application to enable proper assessment pursuant to cl 4.6 of this SEPP.</p> <p>Specifically, the consent authority must not consent to the carrying out of any development on land unless—</p> <ol style="list-style-type: none"> it has considered whether the land is contaminated, and if the land is contaminated, it 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, and if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose. <p>This means that the Detailed Site Investigation (DSI) needs to provide certainty that the land is suitable for the proposed development. If the DSI identifies that remediation of any kind is required, the Remedial Action Plan (RAP) will need to be accompany the DA.</p>	<p>A Preliminary Contamination Report has been prepared by Douglas Partners and is provided at Appendix X.</p>
<p>State Environmental Planning Policy 65 - Design Quality of Residential Apartment Development</p> <p>SEPP 65 applies to the subject development in accordance with section 4, Part 1 of the policy. The DA documentation must provide a compliance statement with regards to Parts 3 and 4 of the ADG, and a Design Verification Statement detailing compliance with the nine design quality principles (SEPP 65, Schedule 1), particularly for the residential component of the development.</p> <p>The drawings must clearly and accurately dimension every unit and rooms within the units. The plans shall detail solar access to units, storage and ventilation.</p> <p>Any departures from the separation requirements under Part 3 ADG will need to be accurately dimensioned and justified.</p>	<p>A Design Verification Statement and a comprehensive assessment against the Apartment Design Guide has been prepared by Antoniadis Architects and is provided at Appendix B. Departures from the ADG are discussed in Section 4.2.2 and Section 4.5.</p>
<p>Willoughby Local Environmental Plan 2012 (Amendment 34)</p> <ul style="list-style-type: none"> Permissibility: It is noted that a registered club is permissible in R2 Zone pursuant to Part 2.5, Schedule 1, Section 6 of the WLEP and Independent Living Units are permissible under SEPP(Housing) 2021. However, the zoning of the land does not allow for a combination land uses, particularly, when both the uses are permissible under two different Environmental Planning Instruments. The applicant to adequately address the permissibility of the proposed development by accompanying a legal advice on permissibility with any development application. FSR: The maximum allowable FSR for the site is 0.4:1. The proposed club needs to comply with this requirement. The pre-da submission does not include GFA plans, however, the statement provided indicates an FSR of 0.64:1, which exceeds the maximum permissible FSR for the site. Additionally, it is unclear as to how the FSR has been calculated, given both components of the development (being a registered club and are subject to different requirements under their respective EPIs. The proposed club has an FSR of 0.4:1 pursuant to WLEP, whereas the seniors housing component would be subject to an FSR of 0.5:1 (non—discretionary development standard) under the SEPP(Housing) 2021. The resultant FSR must be clearly shown for this allotment and any departure will need to be accompanied by a cl 4.6 variation that, in accordance with this clause, demonstrates that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case and that there are sufficient environmental planning grounds to justify contravening the development standard, where environmental planning grounds are tethered in a positive way to the objects of the Environmental Planning & Assessment Act 1979 (s1.3). Likewise, any departure for the site would need to be accompanied by a detailed and robust cl 4.6 variation. It is noted that no cl 4.6 variation was lodged with the pre-DA submission. A preliminary assessment of the scheme finds there are no reasons to vary the FSR standard. The proposal must comply with the maximum permissible FSR. Height of Building: Maximum building height for a development in the zone is 8.5m. The proposed development should comply with this requirement. Cl 6.2 Earthworks: A geotechnical report is required. Cl 6.3 Urban Heat: Applicant to address this clause and note the definition of deep soil zone. 	<p>Legal advice has been prepared by Mills Oakley and is provided at Appendix DD.</p> <p>The proposal's variation to the FSR Development Standard is justified in the Clause 4.6 Variation Request provided at Appendix F and discussed in Section 4.4.2.</p> <p>Further, the proposal's variation to the height of building development standard contained in the Housing SEPP is justified in the Clause 4.6 Variation Request provided at Appendix G and discussed in Section 4.4.1.</p> <p>A Geotechnical Investigation Report has been prepared by Douglas Partners and is provided at Appendix N.</p> <p>Clause 6.3 has been addressed in Section 4.2.3.</p>
<p>State Environmental Planning Policy (Housing) 2021</p> <p>The applicant is required to address all relevant sections of Part 5 of the SEPP (Housing) 2021</p>	<p>Refer to Section 4.2.1.</p>
<p>Willoughby Development Control Plan 2023</p> <p>Any submission should adequately address all relevant parts of the WDCP including:</p> <ul style="list-style-type: none"> Part B Residential Development Part D Commercial Development Part F Transport and Parking Management Part G Vegetation Management Part I Stormwater Management 	<p>A consistency assessment of the proposal against the DCP has been prepared by Ethos Urban and is provided at Appendix BB.</p>

Council comment	Response
<ul style="list-style-type: none"> Part J Building Sustainability <p>Specialist Advice</p> <ul style="list-style-type: none"> Engineering Notes: The site is not tagged as flood affected, however it is potentially impacted by the PMF and the area of the proposed works is adjacent to a main flow path. A flood impact study will be required. On-site stormwater detention (OSD) is to be provided in accordance with the requirements of Part I of the Willoughby DCP and Technical Standard 1. Access and Parking: Access and parking is to be in accordance with AS/NZS 2890.1, AS28909.2 and AS/NZS2890.6 and the requirements of Part F of the WDCP. Plans are to be provided to demonstrate that a bus stop is within 400m and that the accessible path is provided in accordance with the requirements of the SEPP A Traffic Report will be required for the development. It is to detail the impact of the development on surrounding roads and address the items raised above. Traffic and Parking: Traffic impact study is required at DA stage. CTMP is required for demolition and construction activities that includes pedestrian / cyclist's safety plan in the CTMP. 	<p>A Flooding Assessment has been prepared by GRC Hydro and is provided at Appendix S.</p> <p>A Traffic and Parking Assessment Report has been prepared by CJP and is provided at Appendix L. An Access Assessment Report has been prepared by Jensen Hughes and is provided at Appendix K.</p>
<p>DA submission requirements</p> <p>Ensure the DA is accompanied by at least the following:</p> <ul style="list-style-type: none"> Statement of Environmental Effects CI 4.6 variations (if numerical departures are sought, but this is strongly discouraged) Acoustic report Access report Arborist report ADG Parts 3 and 4 Compliance Report Assessment against Seniors Living Policy: Urban Design Guideline for Infill Development Design Verification Statement Landscape plans Stormwater plans Shadow diagrams including view-from-the-sun diagrams to show solar access to units as well as adjoining properties Photomontages Location of mechanical ventilation stacks Survey plan prepared by registered surveyor BASIX Certificate Detailed Site Investigation, plus Remedial Action Plan if required Traffic Report 	<p>Refer to technical inputs referenced in the Table of Contents and the content of this SEE.</p>

1.1.4 Community Engagement on the DA

Community consultation has been an important part of the project's evolution, ensuring the local community, existing Club members and other interested individuals and groups were part of the engagement undertaken prior to the lodgement of this DA. A Consultation Outcomes Report has been prepared by Ethos Urban and is provided at **Appendix J**. The following stakeholders were identified for consultation and the consultation activities and outcomes are summarised below:

- **Surrounding community, including neighbouring residents and landowners and key local groups** – to ensure local values, aspirations and priorities were considered as part of the planning and design process, and to support ongoing relationships and two-way dialogue with project neighbours.
- **Golf Club stakeholders** – to ensure a collaborative working partnership with the development team, that aspirations and concerns for the Club's future were addressed, and that broader members were kept informed and were able to provide feedback to help shape the future of the Club.
- **Elected representatives** – to ensure elected representatives were provided with relevant project background, design details, and community consultation outcomes, to support their offices should they receive enquiries/correspondence during planning, public exhibition, and beyond.
- **City of Willoughby Council** – to liaise with Council to understand priorities, resolve issues and work towards approval of the development.

The activities employed during the pre-DA lodgement stakeholder and community consultation process included the following:

- Community information sessions;
- 1:1 immediate neighbour meetings;
- A street briefing;
- Stakeholder briefings/meetings;
- Elected Local MP Representative briefing;
- A Golf Club board briefing;
- 'Close the loop' correspondence and;
- 1800 phone number and consultation email address.

A high level summary of the key feedback raised throughout the engagement activities and the proposal's response to each is provided in **Table 2** below. For further detailed feedback, please refer to **Appendix J**.

Table 2 Summary of consultation comments

Key feedback	Response
Bulk and scale of proposal	A majority of community feedback indicated that the scale of the development is suitable for residential and golf course purposes. In Section 4.4 of this report, further explanation on this matter has been provided.
Design	Support for key design features, including the clubhouse façade and the landscaping/planting. Further descriptions of these elements have been included in Sections 3.0 and 4.0 .
Purpose	Community support was indicated for the opportunity the development would bring in offering new food and beverage options that are not currently available in the area.
Construction impacts	Stakeholders indicated a level of construction fatigue due to existing neighbouring development activity that has been experienced and it is expected that a high level of communication should be maintained as the project progresses through to delivery.
Operational impacts	Anticipated operational issues registered during the consultation included traffic, parking and noise. It is expected that the Club will continue to work with the local community to ensure operational management plans are suitable and mitigate any issues that may arise. Operational management, traffic, parking, and noise have been assessed in Sections 3.11, 4.7, 4.9 and Appendix L, V and T , respectively.

2.0 Site Analysis and Characteristics

2.1 Site Location and Context

The site is located within the north-eastern part of the Willoughby Local Government Area (LGA), approximately six kilometres north-east of the North Sydney CBD. The site is located 1.25 kilometres south of Warringah Road (A38), which provides a direct link to Chatswood CBD and the Pacific Highway to the west. The site is proximate to local amenities and services, including Castle Cove Anglican Church (260 metres east), Castle Cove Public School (700m west), and a high-frequency bus route to Chatswood CBD.

There are two neighbourhood centres that are proximate to the site, including a cluster of local shops and businesses at the corner of Warrawee Avenue and Denawen Avenue (260 metres east of the site). There are a limited number of cafes and shops approximately 900m west of the site, next to the Castle Cove Public School.

The immediate locality is characterised by low-density residential development across an undulating topography, with a mix of single and double storey housing being the prevailing building typology. This however is in a transitional phase with 3 storey development of seniors housing adjacent to the site at 19 Amaroo Avenue. The suburb of Castle Cove is fringed by Middle Harbour to the north and east. The site is proximate to several areas of public open space and recreation facilities, including Roseville Bridge Marina, Echo Point Park and Castle Cove Park.

The site is located 200 metres east of the intersection of Deepwater Road and Castle Cove Drive. This enables access to the retail offering of Chatswood Business Park and The Willis Recreation and Sports Centre, which are less than a five-minute drive from the site. The location of the site is shown in **Figure 1** below.

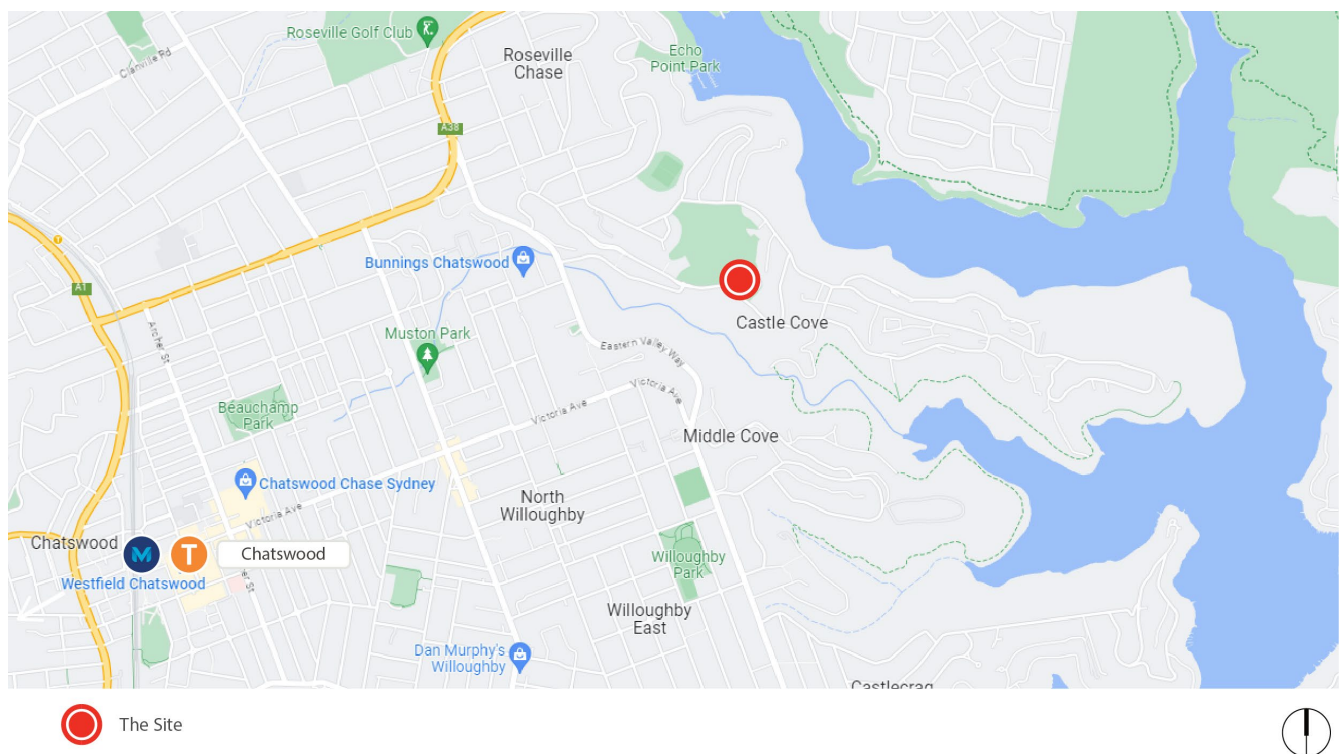


Figure 1 Locational context map

Source: Nearmap and Ethos Urban

2.2 Site Description

The site extends north-east from Deepwater Road and is immediately adjacent to Castle Cove Golf Course. It is irregular in shape, comprising one lot that narrows towards the centre of the site. The site has a total area of approximately 5,723m² and is legally described as Lot 1 DP610360. The site boundaries are summarised below and are shown at **Figure 2**.

- **North-east:** Nonlinear boundary with a combined length of 61m, including abuttal to the south boundary of 15 Amaroo Avenue of 53m.
- **North-west:** Nonlinear boundary to Castle Cove Golf Course with a combined length of 182m. The golf course is owned by Council and leased for a 20-year term under a Plan of Management. Castle Cove Country Club Limited is responsible for the operation and maintenance of the Golf Course whilst operating ancillary services such as the golf shop. The Golf Course includes over 11 hectares of open space and three synthetic surfaced tennis courts.
- **South-east:** Combined boundary length of 105m with abuttal to the west boundary of 76 Deepwater Road of 39m and abuttal to the north boundary of 12 Amaroo Avenue of 42m.
- **South-west:** Combined boundary length of 82m fronting Deepwater Road.

The south-western portion of the site (i.e., the location of the existing car parking area) is relatively flat. The northeastern portion of the site is significantly elevated above the rest of the site and the adjacent golf course. Overall, the site ranges from an RL of 66.77m in the south-western portion to a RL of 83.28m in the elevated north-east corner towards Amaroo Avenue. The site does not include any heritage listed items and does not form part of a Heritage Conservation Area. The site is not proximate to any identified heritage item.



Figure 2 Site aerial map

Source: Nearmap / Ethos Urban

It is to be noted Lot 510 in DP200636 is also located on the site's Deepwater Road frontage and comprises a total area of approximately 16.42m².

2.3 Existing Development

Existing development at the site is detailed below and shown at **Figures 3 to Figure 6**.

Clubhouse

The existing clubhouse is located in the north-eastern part of the site and was constructed in the 1970s. The clubhouse is a two (2) to three (3) storey building with a pitched roof and is of a brick construction. The building is elevated approximately 13m above the carpark due to the natural topography of the site, located on a rock platform providing for high amenity views across the golf course and towards Chatswood CBD.

The clubhouse is an established community venue with a range of facilities, including a bar, function room, golf pro store, and rooms for community and club meetings. The clubhouse exterior and interior exhibit clear signs of aging, and some parts of the building appear to be very deteriorated. The upper level is no longer in use given the poor condition of the interior spaces and facilities. There has been a declining trend in the number of club members. This trend started prior to the onset of Covid-19 government health restrictions and is considered likely to be attributed (in part) to the poor condition of the existing clubhouse facilities.

Deepwater Road Carpark

The south western part of the site comprises a paved car park. As previously noted, the carpark is located approximately 13 metres below the clubhouse due to the natural topography of the site. Vehicle access to the carpark is provided via two crossovers from Deepwater Road. The carpark is predominantly flat with a north easterly incline, with trees and shrubbery established along its eastern, southern and north-western edges. Access to the clubhouse via the carpark is through the use of an external stair system.

Clubhouse Rear Carpark

The north-eastern portion of the site comprises a small carpark at the rear of the clubhouse building. Vehicle access to the carpark is provided via one driveway to Deepwater Road via the Tennis Courts, which are located on the Golf Course. The rear carpark is predominantly flat and is not readily visible from the clubhouse or adjacent properties.



Figure 3 Existing clubhouse (viewed from the golf course looking East)

Source: Ethos Urban



Figure 4 *Carpark fronting Deepwater Road (looking South)*

Source: Ethos Urban



Figure 5 *Existing carpark located at the rear of the existing clubhouse (looking North West)*

Source: Ethos Urban



Figure 6 Existing clubhouse balcony facing west towards Deepwater Road (looking South)

Source: Ethos Urban

2.4 Surrounding Development

As described in **Section 2.1**, the immediate locality is characterised by low-density residential development, with single-detached housing being the prevailing building typology. A summary of development surrounding the site is provided below:

- 15 Amaroo Avenue (**Figure 7**) consists of an established two storey brick dwelling surrounded by vegetation which contains a pool to the north-west. The dwelling is slightly elevated in comparison to the site and overlooks the existing clubhouse.
- Castle Cove Golf Course (**Figure 8**) is an eleven hectare site owned by Willoughby City Council. It is open to the public and includes a nine hole golf course, including three synthetic surfaced tennis courts.
- 76 Deepwater Road (**Figure 9**) is a recently renovated single dwelling, comprising two storeys surrounded by established vegetation.
- 19 Amaroo Avenue (**Figure 10**) is an independent living development comprising 15 units, 22 parking spaces and associated landscaping. Still undergoing construction, a DA for the site was approved by the Land and Environment Court in 2021.



Figure 7 15 Amaroo Avenue, Castle Cove (located directly north east of the site)

Source: Ethos Urban



Figure 8 Castle Cove Golf Course

Source: Ethos Urban



Figure 9 76 Deepwater Road, Castle Cove (located directly south east of the site)

Source: Ethos Urban

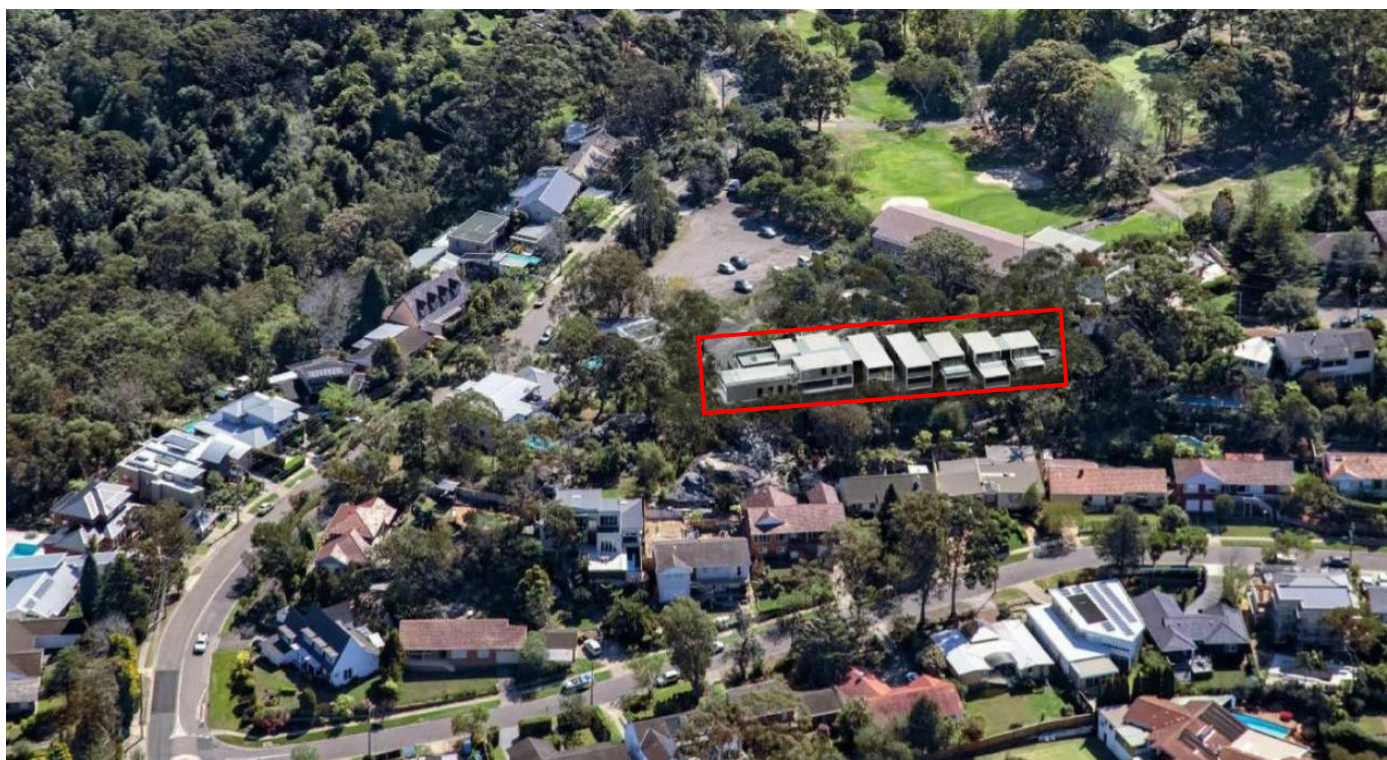


Figure 10 19 Amaroo Avenue, Castle Cove (located directly east of the site in red)

Source: Daily Telegraph

3.0 Description of Proposed Development

The proposal seeks approval for the demolition of the existing buildings and structures on the site, subdivision and the construction of a golf clubhouse and independent living units at 68-74 Deepwater Road, Castle Cove.

Specifically, this DA seeks approval for:

- Demolition of the existing golf clubhouse and car park;
- Subdivision of current Lot 1 in DP 610360 and Lot 510 in DP200636 into proposed lots 1 and 2 (inclusive of easements);
- Construction of a two (2) storey new golf clubhouse, comprising:
 - Ground floor carpark comprising 76 spaces and one (1) loading zone; and
 - First floor comprising a foyer; dining lounge; kitchen and service area; pro-golf shop; club administration area and meeting room; male/female changing rooms and toilet facilities; terrace dining and golf buggy and cart storage cages.
- Construction of a part two (2) and three (3) storey building for Independent Living Units (ILUs) comprising:
 - Three (3) two bedroom and 14 three bedroom units; and
 - Two (2) level basement car parking containing 26 spaces, one (1) bus zone and one (1) loading zone.
- Associated landscaping.

Photomontages of the proposal are provided below in **Figures 11** to **Figure 15**.



Figure 11 Deepwater Road elevation of proposed clubhouse and access way to ILUs

Source: Taylor



Figure 12 *View of proposed clubhouse and adjacent existing dwelling at 76 Deepwater Road, Castle Cove*

Source: Taylor



Figure 13 *View of clubhouse entrance on Deepwater Road*

Source: Taylor



Figure 14 *View of proposed clubhouse from the golf course*

Source: Taylor



Figure 15 *View of proposed ILUs from the golf course*

Source: Taylor

3.1 Numerical Overview

A detailed numerical breakdown for the proposed development is provided at **Table 3**.

Table 3 *Key development information*

Component		Proposed Development
Site area (m ²) (approx.)		5,723m ²
Maximum Building Height		Clubhouse: 8330mm or RL 75.48 (maximum) ILU building: 14260mm or RL 87.37 (This is due to the drop in the natural ground in the steepest). If overall highest RL, then would be a RL 92.10 which accounts for the lift overrun.
GFA		3,558m ²
FSR		0.62:1
Setbacks	Front (Deepwater Road)	Deepwater Road – varies from 4.2 m to 5.6m
	Side (south east)	ILU building: between 3m and 19.5m Clubhouse: 4.3m and 6.4m
	Rear (north eastern boundary)	Minimum of 3m
ILU Mix	3 Bedroom	14
	2 Bedroom	3
Landscaped Open Space		21.5% of site area (1,487m ²)
Deep Soil		15% of site area (861.92m ²)
Vehicle Access		Access via two (2) separate vehicular driveways on Deepwater Road providing separated access to the clubhouse and ILUs.
Carparking Provision		ILUs: <ul style="list-style-type: none"> • 24 ILU's (3 adaptable, 8 accessible) • 2 Visitor (1 accessible) Clubhouse: <ul style="list-style-type: none"> • 76 (4 accessible)

3.2 Site Preparation Works

3.2.1 Demolition

The proposal necessitates the demolition of the existing buildings and structures on the site including hard paved car parking areas. The extent of the demolition is shown in **Figure 16**.



Figure 16 Proposed demolition plan

Source: Antoniades Architects

The proposed development will likely require bulk excavations to accommodate the ground level carparking associated with the clubhouse, the ILU fire stairs as well as the ILU basement carpark.

3.2.2 Vegetation Removal

The proposal necessitates the removal of 22 trees of the existing 45 trees. A detailed assessment of the trees to be removed and retained, along with the recommendations for mitigating impacts during construction and excavation is provided in **Section 4.6**. Where possible, the trees will be retained, and protection measures will be implemented to enable ongoing protection during construction works. New tree planting at a rate of 3:1 is proposed. Revaluation of the trees proposed to be removed on the eastern boundary will be undertaken by the Arborist during construction excavation to determine if retention is possible pending soil conditions. Therefore, the total number of trees to be replaced is yet to be determined.

3.3 Built Form and Land Use

The proposal seeks approval for two (2) distinct built forms, the clubhouse fronting Deepwater Road and the ILUs located within the rear portion of the site, which is connected to the club via an accessible pedestrian path and to Deepwater Road via both pathway and vehicle access. The siting of the buildings is provided in **Figure 17** below. The following sections provide an overview of the built form and land use associated with each of the uses.

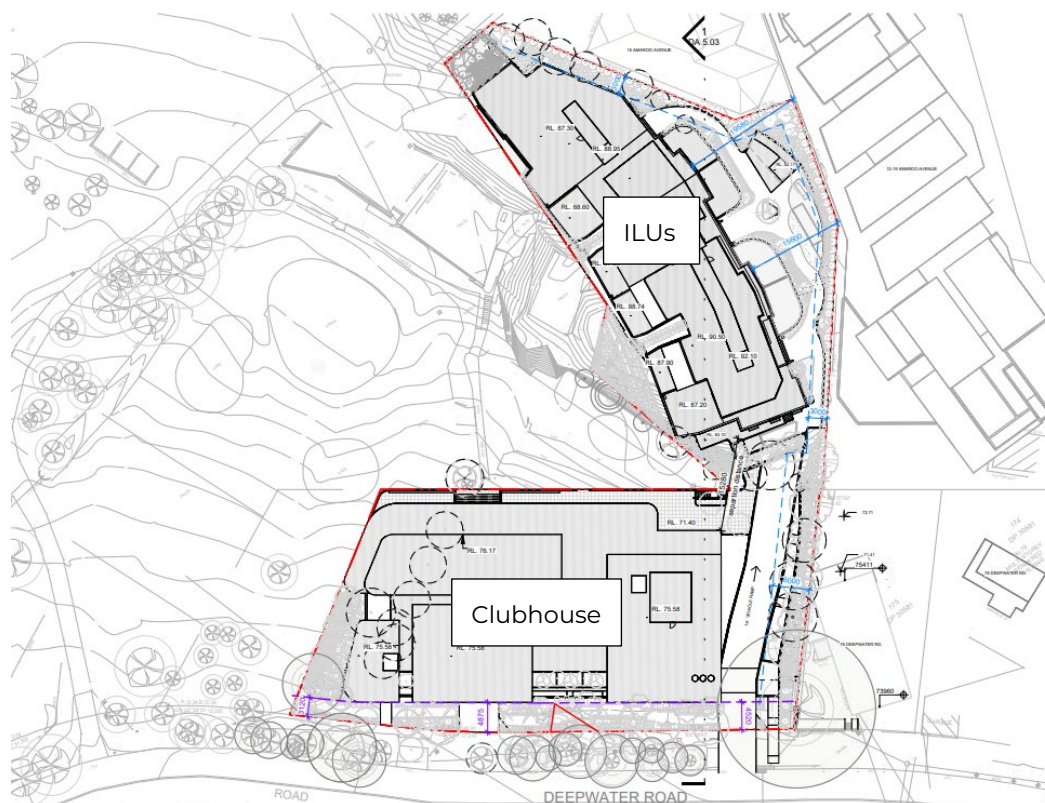


Figure 17 Proposed development footprint

Source: Antoniades Architects

3.3.1 Clubhouse

The clubhouse building is located on Deepwater Road and comprises a two (2) storey built form with ground level carparking consisting of 76 car parking spaces accessible from Deepwater Road. It comprises a maximum height of 9.17m, with all services remaining 8.5m. The building's primary pedestrian entrance is located within the south western portion of the building, directing visitors to Level 1 where the clubhouse facilities are located. The clubhouse is oriented to the north and north-west to maximise views out to the golf course. Level 1 of the clubhouse encompasses a range of spaces including:

- Dining, lounge and associated outdoor dining terrace area;
- Administration/office and meeting room space;
- Pro Golf Shop;
- Kitchen and back of house area;
- Amenities; and
- Gold buggy storage area.

The above spaces are shown in **Figure 18** below.

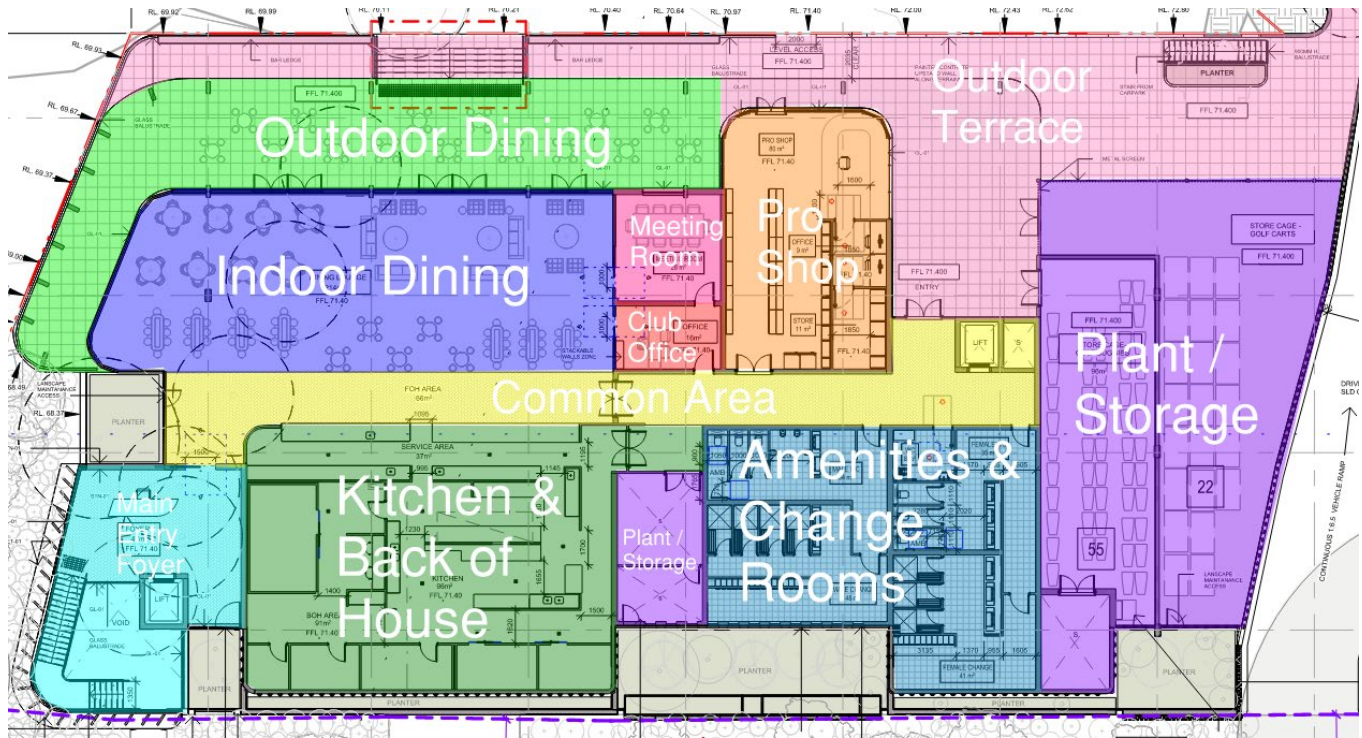


Figure 18 Proposed Ground Level – general arrangement plan

Source: Antoniades Architects

Due to the change in level across the portion of the site relating to the clubhouse, the built form reads as two (2) storeys when viewed from Deepwater Road and one (1) storey when viewed from the golf course (refer to **Figure 19**). The render at **Figure 11** provides a visual representation of the proposal when viewed from Deepwater Road and the render at **Figure 14** shows the interface with the golf course.

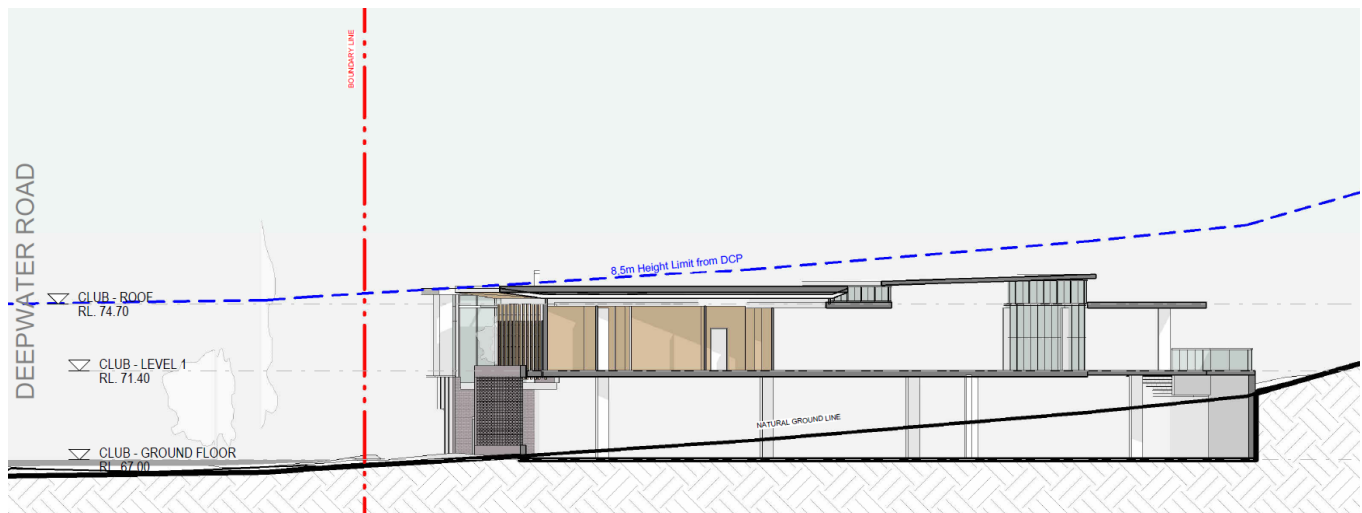


Figure 19 Section showing change in topography across the site

Source: Antoniades Architects

3.3.2 Seniors Housing - Independent Living Units (ILUs)

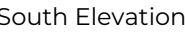
The building comprising ILUs is located within the northern portion of the site. It comprises two (2) to three (3) storeys, which includes a lower ground level and also a basement level. A summary of the components within each of the levels is provided in **Table 4**. Of the 17 ILUs, all are provided with dual aspects and most have been oriented to the east and the west optimising views over the golf course.

Table 4 *ILU building components*

Level	Components
Basement Level	<ul style="list-style-type: none"> • 4 car parking spaces • 2 x plant areas
Lower Ground Level (partial basement)	<ul style="list-style-type: none"> • 1 x 3 Bedroom ILU • 22 car parking spaces • Storage cages • Loading zone • 2 x waste rooms • Temporary bus pick-up zone • Plant area • Lift lobby
Ground Level	<ul style="list-style-type: none"> • 3 x ILU lobbies/cores • Communal lift providing access to clubhouse • 1 x 2 Bedroom ILU • 6 x 3 Bedroom ILU • Barbecue area and associated amenities
Level 1	<ul style="list-style-type: none"> • 1 x 2 Bedroom ILU • 6 x 3 Bedroom ILU
Level 2	<ul style="list-style-type: none"> • 1 x 2 Bedroom ILU* • 1 x 3 Bedroom ILU* <p>*Both ILUs are provided with significantly sized rooftop terraces.</p>

Due to the site's fall from an approximate RL 84.1m(south) to RL 71.4m (north), there are two differing ground levels. The Lower Ground Level measures at RL 77.90m whereas the Ground Level measures at RL 81m which respond to the site's contours. As noted above, one (1) ILU is located on the Lower Ground Level which is accessible via the lift connected to the north-western Ground Level lobby.

Elevations of the ILU building are provided in **Figure 20** below.



Source: Antoniades Architects

3.4 Facade and Materiality

The proposed development will be constructed using various materials and finishes to create a contemporary, high quality development that is compatible with the surrounding built form, while providing visual interest and complementing the surrounding landscape and golf course. The proposed schedule of materials include:

- Brick;
- Glass (both Clear and obscure);
- Stone; and
- Metal Cladding.

A sample of the proposed materials is shown at **Figure 21** below. The application of the materials is illustrated in detail in the Architectural Plans provided at **Appendix A**. Further commentary is also provided in the Design Statement provided at **Appendix B**.

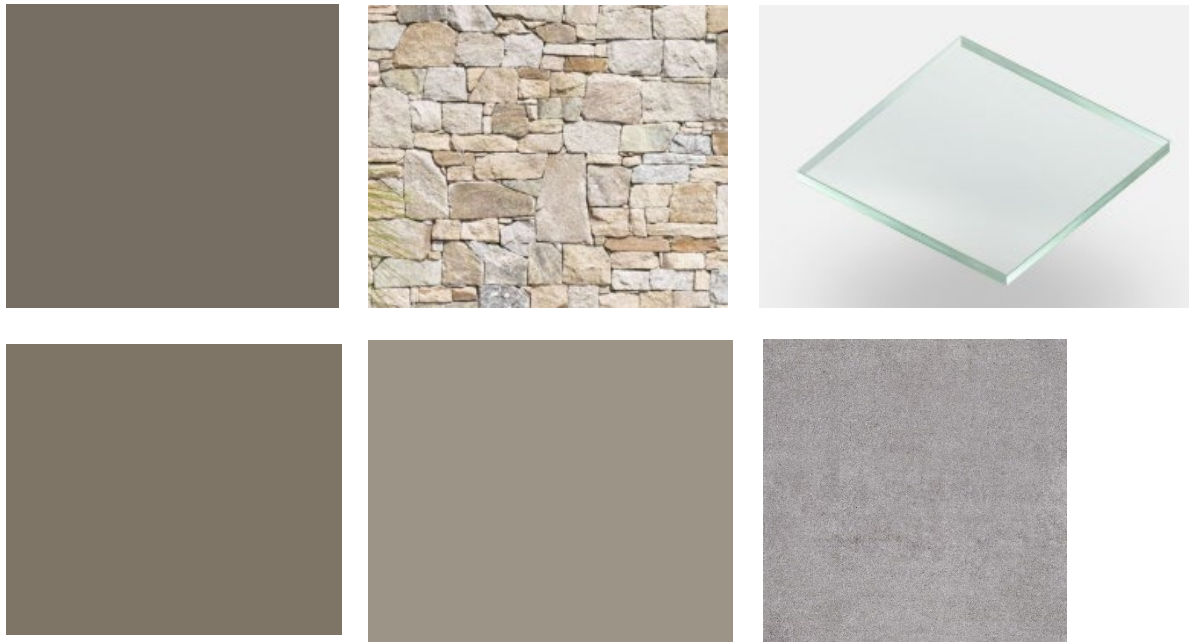


Figure 21 *Materials palette*

Source: Antoniades Architects

3.6 Footpath Regrading

The proposal seeks to regrade a small part of the footpath area located on the opposite side of Deepwater Road to accommodate a new path ramp (refer to **Figure 23**) and to both sides of Allambie Road (refer to **Figure 24**), in order to provide an safe and accessible path of travel to the nearest public transport, being the bus stop located on Allambie Road (adjacent to 90 Deepwater Road, Castle Cove).

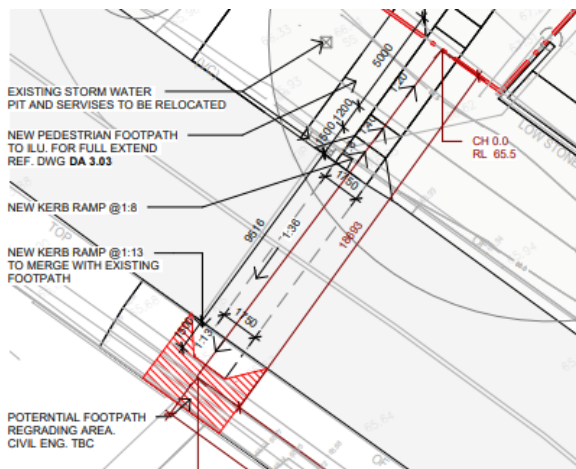


Figure 23 Footpath regrade – Deepwater Road

Source: Antoniades Architects

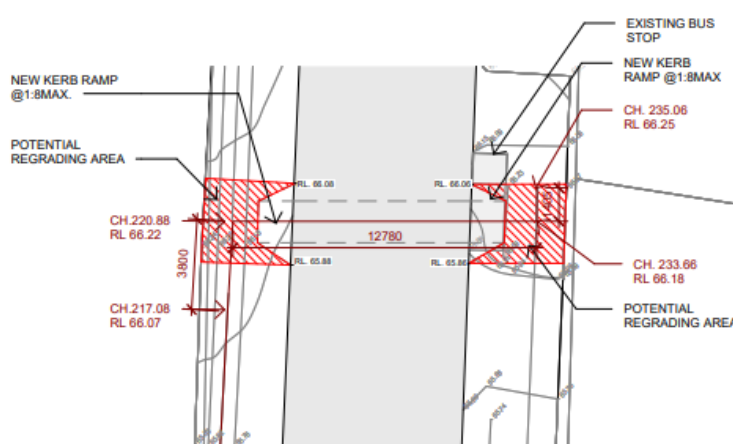


Figure 24 Footpath regrade – Allambie Road

Source: Antoniades Architects

3.7 Site Access

3.7.1 Pedestrian Access

Clubhouse

As noted in **Section 3.4.1**, the clubhouse can be accessed by pedestrians from Deepwater Road via the Ground Level lobby located west of the building's elevation to the street. Those using the carpark can also access the clubhouse from a lift located within the central portion of the Ground Level car park.

The Level 1 clubhouse space can be accessed via four entry points:

- Lobby area (from Ground Level);
- Carpark central lift (Ground Level);
- Northern boundary from Golf Course; and
- ILU lobby.

Independent Living Units

A pedestrian path is provided along the site's eastern boundary, with landscaped setback from the boundary, which leads to a lift providing a connection to the Ground Level of the ILUs. The path of travel is highlighted in blue **Figure 25**.



Clubhouse – Top of Ground Level

Figure 25 Pedestrian path of travel to ILUs highlighted in blue

Source: Antoniades Architects

3.7.2 Vehicular Access

Clubhouse

An at-grade vehicular access point to the clubhouse is proposed off Deepwater Road, which provides for both entry and egress from the car park.

Independent Living Units

Vehicular access to the ILUs is proposed via a ramped access located within the eastern portion of the site's frontage to Deepwater Road and is accessible via Deepwater Road. The ramp connects to the ILU building's Lower Ground Level.

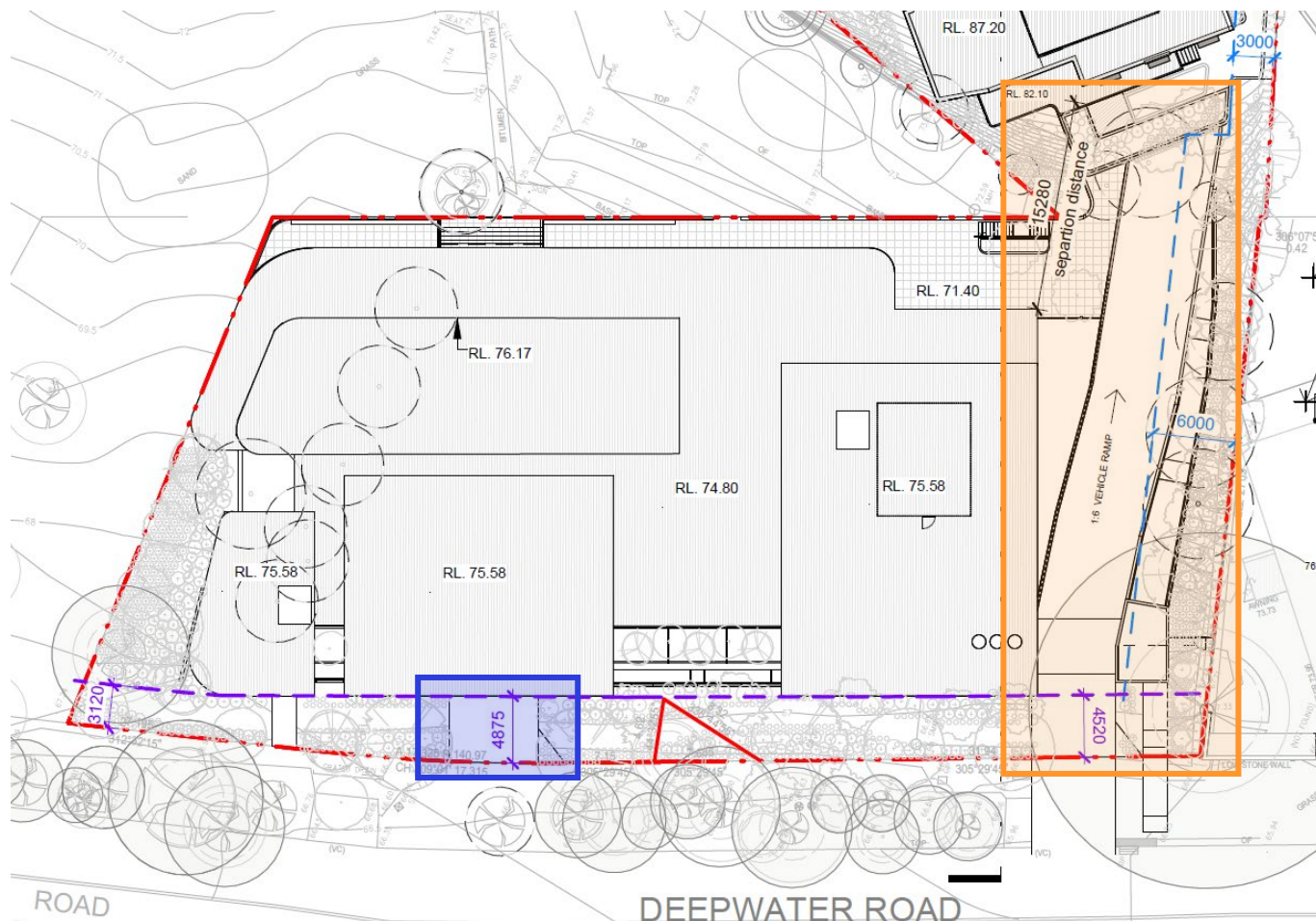


Figure 26 Clubhouse vehicular access shaded in blue and ILU vehicular access shaded in orange

Source: Antoniades Architects

3.8 Waste Management

Independent Living Units

It is expected that the ILUs will generate in the order of 2,380L general waste, 2,040L of recycling waste and 2,040L garden waste which will require storage in the form of:

- General Waste: 10 x 240L MGBs;
- Recycling: 9 x 240L MGBs; and
- Garden Waste: 9 x 240L MGBs.

The Lower Ground Level of the ILU building provides for a waste storage area of 25m² which is in alignment with the estimated area required.

A private contractor will be engaged to collect the waste and recycling (recommended weekly). Further information is provided in the Operation Waste Management Plan prepared by Elephants Foot and provided at **Appendix V**.

Clubhouse

The Clubhouse is anticipated to generate in the order of 12,619.6L general waste and 8,781.15L of recycling waste which will require storage in the form of:

- General Waste: 4 x 1,100L MGBs;
- Cardboard/Paper Recycling: 2 x 1,100L MGBs; and
- Commingled Recyclables: 2 x 660L MGBs.

The Ground Level of the clubhouse provides for a waste storage area of 23m² which is in alignment with the estimated area required.

A private contractor will be engaged to collect the waste and recycling (recommended three (3) times a week). Further information is provided in the Operation Waste Management Plan prepared by Elephants Foot and provided at **Appendix R**.

3.9 Services and Utilities

Electricity

Ausgrid has notified the proponent that the current network does not have the capacity to connect the proposed development with the required electricity connection, therefore there will be the requirement to extend or augment the currently available infrastructure to accommodate. This will involve the installation of a kiosk type substation as part of the DA at cost to the proponent. An indicative location of the substation (utilising standard size requirements) has been provided within the front setback of the clubhouse on Deepwater Road. Further information has been provided in the letter provided by Ausgrid provided at **Appendix Y**.

Water and Sewer

An existing Sydney Water water main is located on Deepwater Road and is available for connection to the proposed clubhouse, however there will be a requirement to construct a water main extension from the 100mm CICL water main located in Amaroo Ave to serve the proposed ILUs, at proponent expense. Further information has been provided in a letter that was issued by Sydney Water and is provided at **Appendix Y**.

Additionally, the existing 150mm SGW sewer main crossing the property will require alteration to connect the overall development to the sewage network. Once realigned, Sydney Water has confirmed that it is anticipated to be sufficient in capacity to cater for the proposed load expected from the redevelopment.

Gas

Gas will be required for the clubhouse kitchen and is anticipated to be connected off Deepwater Road for this purpose.

3.10 Castle Cove Golf Clubhouse Operations

The clubhouse component will cater for approximately 150 - 200 patrons and is likely to operate between 6:30am to 10:00pm most days and 6:00am to 12:00am on select occasions. The Castle Cove Golf Club currently has approval for operation hours between 6:00am – 12:00pm. An Operational Plan of Management for the Castle Cove Golf Club has been prepared by Castle Cove Golf Club and is provided at **Appendix V**. A breakdown of the Clubhouses daily operations is provided below.

Opening Procedures

The clubhouse will generally open at 6:30am and follow a structured process of preparing the facility for patrons, including monitoring cleanliness and morning preparation of amenities. Staff will conduct a daily meeting to discuss the schedule and events with specific roles and responsibilities.

Pro Shop Operations

The operation of the pro shop will involve ensuring the store is well-stocked and prepared for the orderly sale and rental of equipment. This store will be open to both members and the public and will require staff to provide sporting information, enquiries, safety and assistance in golf related procedures.

Food and Beverage Services

The food and beverage service will be operated within the requirements of health and safety regulations to ensure appropriate offerings and service. This will include ensuring that guests and members behave in a respectful manner to adjacent neighbours.

Daily Administrative Tasks

Tasks that will be conducted as part of regular operating hours will include assisting both members and the public with any issues regarding events, reservations, and bookings for either golf or dining options. Additionally, ensuring that the club is properly managed regarding cleanliness and procedure, including being available as a source of contact for any concerns or complaints. Local regulations and guidelines will be enforced by all staff members to ensure that safety protocols are followed and adhered to.

Closing Procedures

The final check of the facility for cleanliness and security will take place, including securing cash registers, locking up the facility with all alarms on and securing the premises.

3.11 Construction Staging

The following outlines the construction staging of the project over a 19 month period:

- Stage 1 (Month 1 – 4)
 - Site establishment, demolition, excavation
- Stage 2 (Month 5 – 12)
 - Crane erection, construction of main building structure
- Stage 3 (Month 10 – 16)
 - Fit out and façade works
- Stage 4 (Month 15 – 18)
 - Landscaping and external works
- Stage 5 (Month 19)
 - Site demobilisation and construction completion

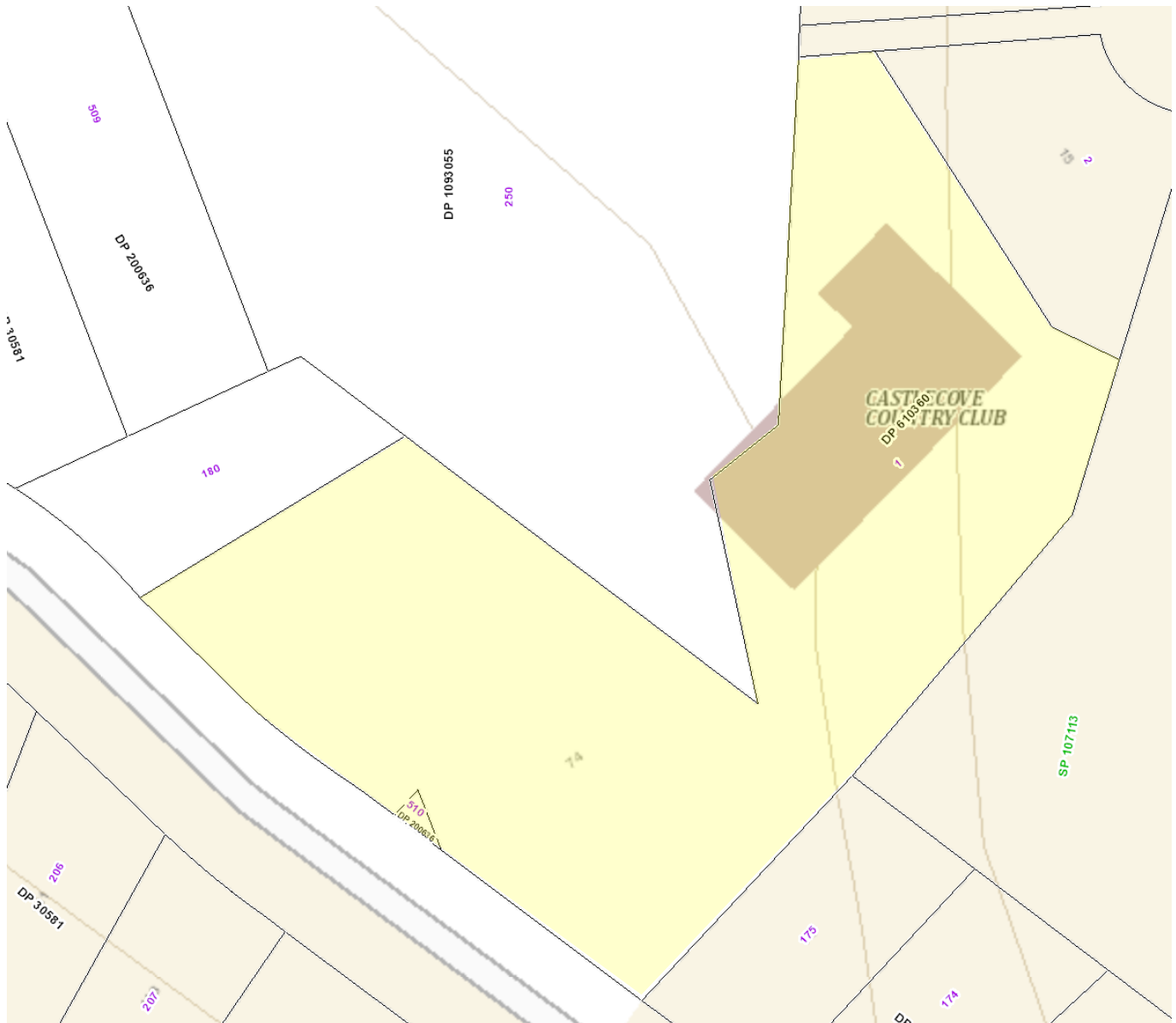
3.12 Subdivision

The proposal seeks approval for a Torrens Title subdivision of the existing Lot 1 in DP 610360 which is permitted in this zone under Willoughby LEP 2012 and would provide for the separation of titles for the total site area into two allotments limited in stratum. These are described below and illustrated in **Figure 27**:

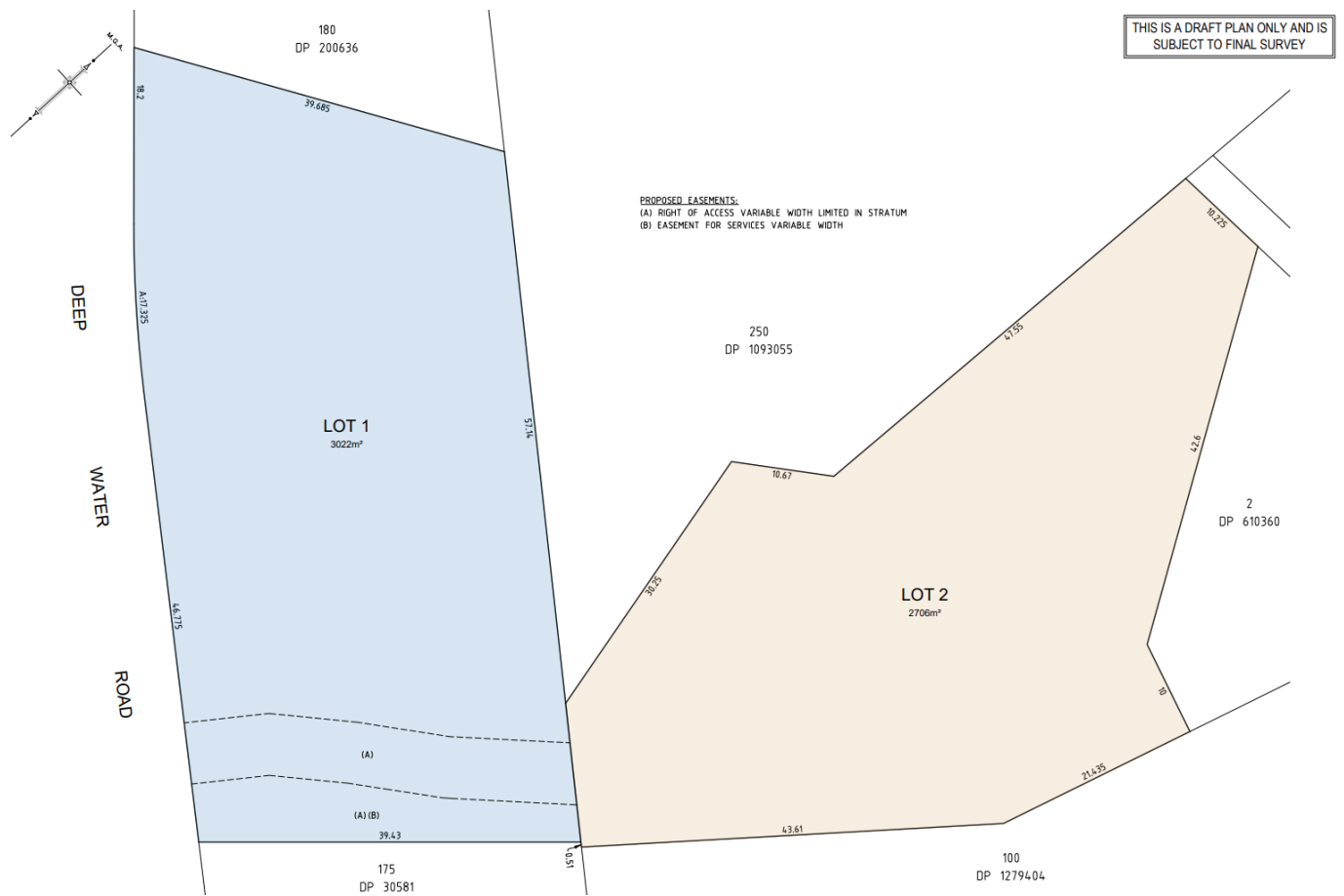
- Lot 1 (clubhouse): 3,022m²
- Lot 2 (ILU site): 2,706m²

Two (2) easements are proposed for right of access and services. Refer to **Appendix AA** for more detail.

It is to be noted existing Lot 510 in DP200636 is also to be consolidated within proposed Lot 1.



Existing allotments



Proposed allotments

Figure 27 Existing and proposed subdivision of clubhouse and ILU portions of the site

Source: LTS

4.0 Planning Assessment

4.1 Compliance with Relevant Strategic Plans and Policies

State and local government plans, policies and guidelines relevant to the Project's strategic context include:

- *NSW Government Greater Sydney Region Plan*;
- *NSW Government North District Plan*;
- *Willoughby City Local Strategic Planning Statement 2020*; and
- *Willoughby Housing Strategy 2036*.

A summary of the project's strategic context is provided in **Table 5** below.

Table 5 Summary of strategic context

Plan	Comments
Greater Sydney Region Plan – A Metropolis of Three Cities	<p>In March 2018, the Department of Planning and Environment (DPE) released the final Greater Sydney Region Plan. The plan aims to ensure land use and transport opportunities develop more equitably across Greater Sydney.</p> <p>The proposed development is considered to be consistent with the objectives of the Plan as it will:</p> <ul style="list-style-type: none"> • Ensure communities are healthy, resilient and socially connected; • Deliver on community infrastructure that meets the changing needs of Castle Cove; • Provide greater housing supply and diversity in the Willoughby LGA and; • Create a great places that brings people together. <p>The proposed development will not only increase the supply and diversity of housing for seniors in the Willoughby LGA but will renew a greatly needed community asset that promotes social interaction amongst neighbours of the wider community.</p>
North District Plan;	<p>The site is located within the North District. The North District Plan was released in March 2018 and provides a range of priorities and actions to improve the District's lifestyle and environmental assets.</p> <p>The North District Plan recognises the large proportion of growth in older people to 2036, with a 47% increase in people aged 65-84 years and an 85% increase in the 85+ year age group. This equates to 20% of the District's population being aged 65 years and over, up from 16% in 2016.</p> <p>The Plan recognises that more diverse housing types and medium density housing will create opportunities for older people to continue living in their community, while being close to their established neighbourhood and in proximity to family, friends and existing infrastructure and services. Accordingly, the proposed development has the ability to align with Planning Priority <i>N5 - Providing housing supply, choice and affordability with access to jobs, services and public transport</i>, as it:</p> <ul style="list-style-type: none"> • Recognises the demand for different housing types and tenures within accessible locations, specifically, aged care facilities; • Responds to housing preferences in Greater Sydney where people generally prefer to remain within their local area, with 82% of residents moving into a new home within 15km of their former residences; and • Fosters a healthy, creative, culturally rich and socially connected community. <p>In addition to providing housing, the proposed development will align with Planning Priority <i>N4 Fostering healthy, creative, culturally rich and socially connected communities</i>, as it:</p> <ul style="list-style-type: none"> • Strengthens social connections within and between communities through supporting infrastructure such as the clubhouse; and • Promotes aging in place by co-locating seniors living with social and sporting facilities in an accessible location to everyday services and amenities.
Willoughby City Local Strategic Planning Statement 2020	<p>The Willoughby City Local Strategic Planning Statement (LSPS) sets a 20-year vision with priorities and actions for land-use planning in the Willoughby City LGA. The LSPS came into effect on the 10th of February 2020. The LSPS estimates that population growth in Willoughby</p>

Plan	Comments
	<p>City will increase from 78,000 in 2016 to 92,000 in 2036, with residents aged 65 and over increasing from 13.6% to 17.3% of the total population within this period.</p> <p>The LSPS places a strong emphasis on new development aligning with key principles such as increasing housing diversity to cater to the aging population; placing more dwellings close to open space; augmenting local infrastructure and using existing infrastructure more efficiently to accommodate planned sporting and community demand.</p> <p>The renewal of the existing clubhouse in addition to the new ILUs will result in a development that is closely aligned with these strategic objectives. The proposed development will be located on an existing site and will allow for the improvement of facilities that meet the needs of the growing population whilst allowing for existing residents living in Castle Cove to age in place.</p>
Willoughby Housing Strategy 2036	The Willoughby Housing Strategy 2036 provides direction about when and where future housing growth will occur in 2036 and beyond, consistent with the North District Plan. The Housing Strategy identifies that those within retirement age groups (60 and above) will make up a large portion (43%) of the expected population increase to 2036. The proposed development will align in bringing forward additional housing stock for this increase, by providing the ageing population the ability to downsize without compromising on location and amenity.

4.2 Legislation and Environmental Planning Instruments

The DA's consistency and compliance with the relevant environmental planning instruments are considered in the sections below. The documents that have been considered, include:

- Environmental Planning and Assessment Act 1979;
- State Environmental Planning Policy (Housing) 2021;
- State Environmental Planning Policy (Sustainable Buildings) 2022;
- State Environmental Planning Policy (Planning Systems) 2021;
- State Environmental Planning Policy (Biodiversity and Conservation) 2021;
- State Environmental Planning Policy (Resilience and Hazards) 2021;
- State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development;
- Willoughby Local Environmental Plan 2023; and
- Willoughby Development Control Plan 2023.

4.2.1 State Legislation

The relevant state environmental planning policies are assessed in **Table 6** below.

Table 6 Summary of consistency with State legislation

Section	Comment
Environmental Planning and Assessment Act 1979 (EP&A Act)	<p>All relevant matters for consideration under Section 4.15 have been addressed in the assessment of this application.</p> <p>The proposed development is consistent with the objects of the EP&A Act for the following reasons:</p> <ul style="list-style-type: none"> • The proposal takes into consideration the resources of the state both natural and other, whilst promoting the social and economic welfare by providing suitable housing and community amenities in a well suited location; • It will facilitate ecologically sustainable development; • The proposed ILUs will deliver addition housing stock that promotes aging in place and will facilitate downsizing which will result in adjacent housing stock to become available; • The proposal promotes a high level of design and amenity for the built environment; • Health and safety will be adhered to in the proper construction and maintenance for building inhabitants, visitors and construction workers; and • The proposal's pre-lodgement activities have provided opportunities for the community to comment on the proposal prior to its public exhibition.
Rural Fires Act 1997	Part of the site is categorised as 'Bush Fire Prone Land' (located within a 'Vegetation Buffer') in accordance with the Rural Fires Act 1997. Section 100B of the Rural Fires Act relates to the

Section	Comment
	subdivision of bush fire prone land that could lawfully be used for residential or rural residential purposes and to the development of bush fire prone land for a special fire protection purpose. As the proposal seeks approval for subdivision (as noted in Section 3.13), and also relates to development that is for a special fire protection purpose (seniors housing), the application will be considered as Integrated Development and require concurrence.
State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP 2021)	As the proposed development has a Capital Investment Value (CIV) of \$33,560,642, it is classified as Regionally Significant Development and is required to be determined by the Sydney North Planning Panel (SNPP).
State Environmental Planning Policy (Resilience and Hazards) 2021 (Resilience and Hazards SEPP 2021)	In accordance with Clause 4.6 of the Resilience and Hazards SEPP, the application is accompanied by a Preliminary Site Investigation (PSI) prepared by Douglas Partners and provided at Appendix N . The assessment concluded through a series of investigations, including laboratory testing from 10 geotechnical boreholes taken across the site, that there were no observed sub-surface soils that contained or were considered at risk of contamination.
State Environmental Planning Policy (Biodiversity and Conservation) 2021 (Biodiversity and Conservation SEPP 2021)	An assessment of the proposal's consistency with the <i>Biodiversity Conservation Act 2016</i> and the <i>Environment Protection & Biodiversity Conservation Act 1999</i> has been undertaken as part of the Ecological Issues & Assessment Report prepared by Gunninah and is provided at Appendix P . It was concluded there are no significant or particularly relevant ecological or biodiversity features or values within the site.
State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP 2022)	A BASIX and NCC Section J report was prepared in accordance with the State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 which was applicable to the DA at the time of its preparation. Refer to Appendix I .
State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP 2021)	The Transport and Infrastructure SEPP does not apply to the proposal. The proposal is not considered to be traffic generating development. Refer to Transport Impact Assessment prepared by CJP Consulting Engineers and provided Appendix L .

State Environmental Planning Policy (Housing) 2021

The *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) sets the standards for the development of seniors housing in NSW.

The proposed development is made pursuant to the Housing SEPP. The proposed development partly for the purposes of seniors housing in the form of Independent Living Units is permissible in the R2 zone.

The key provisions of the Housing SEPP have been considered in the preparation of the DA are addressed in **Table 7**.

Table 7 Relevant provisions of the Housing SEPP

Section	Comment
Part 5 – Housing for seniors and people with a disability	
Division 1 – Land to which Part applies	
Section 79 – Land to which Part applies	The portion of the site subject to seniors housing development (ILUs) is zoned R2 Low Density Residential and therefore the use is permissible under the Housing SEPP.
Division 3 – Development Standards	
Section 84 – Development Standards – general	
1) This section applies to development for the purposes of seniors housing involving the erection of a building.	The proposed development is for the purposes of seniors housing involving the erection of 17 ILUs and a clubhouse building (not relevant to the SEPP).
2) Development consent must not be granted for development to which this section applies unless –	
a) The site area of the development is at least 1,000m ² , and	The site has an area greater than 1000m ² at approximately 5,723m ² .
b) The frontage of the site area is at least 20m measured at the building line, and	The frontage of the site area to Deepwater Road is approximately 82 metres, measured at the building line.
c) For development on land in a residential zone where residential flat buildings are not permitted – <ul style="list-style-type: none"> i. The development will not result in a building with a height of more than 9.5m, excluding servicing equipment on the roof of the building, and ii. If the roof of the building contains servicing equipment resulting in the building having a height of more than 9.5m – the servicing equipment complies with subsection (3), and iii. If the development results in a building with more than 2 storeys – the additional storeys are set back within planes that project at an angle of 45 degrees inwards from all side and rear boundaries of the site. 	Residential flat buildings are not permitted with consent in the R2 Low Density residential zone, and therefore the following provisions apply. The proposed development comprises a maximum building height of RL 92.1 which equates to 14260mm. The components that exceed the 9.5m maximum height of buildings development standard relate not just to servicing equipment. It should be noted that the exceedances beyond 9.5 are limited to an area of 7.6% and will not result in the building having a height of more than 11.5m. A Clause 4.6 Variation Request has been prepared which demonstrates why the exceedance is considered appropriate. Refer to Section 4.4.1 for further justification and the Clause 4.6 Variation Request at Appendix C . The additional storeys are set back at the 45 degree angle from all side and rear boundaries.
3) The servicing equipment must – <ul style="list-style-type: none"> a) Be fully integrated into the design of the roof or contained and suitably screened from view from public places, and b) be limited to an area of no more than 20% of the surface area of the roof, and c) not result in the building having a height of more than 11.5m. 	

Section	Comment
Section 85 – Development standards for hostels and independent living units	Part of the proposed development is for the purposes of ILUs and has been designed with regard to the relevant standards specified in Schedule 4.
Section 88 – Restrictions on occupation of seniors housing	The component of the proposed development relating to the ILUs will comprise seniors 60 years and older. A restriction in this regard will be required on the Title via a condition of consent.
Section 90 – Subdivision	
1) Development consent may be granted for the subdivision of land on which development has been carried out under this Part.	The proposal seeks to subdivide the land as outlined in Section 3.13 in accordance with the Willoughby LEP 2012.
2) Development consent must not be granted for the subdivision of a building resulting from development carried out under this Part on land in Zone E2 Commercial Centre or Zone B3 Commercial Core.	Not applicable. The proposed development is not located with a E2 Commercial Centre or B3 Commercial Core zone.
Section 92 – Development on land used for the purposes of an existing registered club	
1) Development consent must not be granted for development under this Part on land used for the purposes of an existing registered club unless the consent authority is satisfied that— a) the development includes appropriate measures to separate the club from residential areas to avoid land use conflicts, and b) an appropriate protocol will manage the relationship between the seniors housing and the gambling facilities on the site of the club to minimise harm associated with the misuse and abuse of gambling activities by residents of the seniors housing.	The proposal includes a design which provides for the separation of uses to minimise land use conflict. An accessible path of travel is provided to residents of the ILUs in the event they wish to use the clubhouse facilities. It should be noted no gambling facilities are proposed within the proposed clubhouse. While the proposal as a whole is connected, a separation distance of 15.28m is provided between the clubhouse and ILU building forms.
2) For the purposes of subsection (1)(a), appropriate measures include the following— a) separate pedestrian access points for the club and the residential areas of the seniors housing, b) design principles underlying the building aimed at ensuring acceptable noise levels in bedrooms and living areas in the residential areas of the seniors housing.	Separate pedestrian access points for the club and the ILU building have been incorporated in the design as illustrated Appendix A . Anticipated noise levels to the ILUs has been assessed as part of the Noise Impact Assessment provided at Appendix T .
Division 4 – Site related requirements	
Section 93 – Location and access to facilities and services – independent living units	
1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services –	
a) By a transport service that complies with subsection (2), or b) On-site.	Residents will be within a 3 minute walk to the bus stop located on the corner of Allambie Rd and Deepwater Rd (Stop ID: 206942) which will directly connect them to Chatswood CBD. Further details is provided in Section 4.9 . The design also incorporates a temporary bus pick up zone for a private service which will be available to residents.
2) The transport service must –	

Section	Comment
<ul style="list-style-type: none"> a) take the residents to a place that has adequate access to facilities and services, and b) for development on land within the Greater Sydney region – <ul style="list-style-type: none"> i. not be an on-demand booking service for the transport of passengers for a fare, and ii. be available both to and from the site at least once between 8am and 12pm each day and at least once between 12pm and 6pm each day. 	As mentioned above, the bus service available at the bus stop located on the corner of Allambie Rd and Deepwater Rd (Stop ID: 206942) caters to bus route 277 (Chatswood to Castle Cove) which provides a loop service between the hours of 7am to 7pm Monday to Friday in 30 minute peak time intervals.
3) For the purposes of subsections (1) and (2), access is adequate if –	
<ul style="list-style-type: none"> a) The facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and b) The distance is accessible by means of a suitable access pathway, and Note: A suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like. c) The gradient along the pathway complies with subsection (4)(c). 	The transport service is located within a 270m walk distance from the site. The proposal includes footpath regrading works to ensure a suitable access pathway is provided to and from the bus stop from the ILUs.
Section 95 – Water and Sewer	The ILUs will be connected to a reticulated water system and have adequate facilities for the removal/disposal of sewage.
Section 96 – Bush fire prone land	The site is identified as being partly within the vegetation buffer and therefore classified as Bush Fire Prone Land. A Bush Fire Assessment has been prepared and is provided at Appendix O . It is acknowledged the DA will require approval under the Rural Fires Act 1997.
Division 5 – Design requirements	
Section 97 – Design of seniors housing	The proposed development has been designed with regard to the <i>Seniors Housing Design Guide, December 2023</i> . The proposal has also been designed with regard to Schedule 8 of the Housing SEPP as discussed below.
Schedule 8 – Design Principles	
1. Neighbourhood amenity and streetscape	
Seniors Housing should be designed to –	
<ul style="list-style-type: none"> a. to recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, 	Not applicable.
<ul style="list-style-type: none"> b. to recognise the desirable elements of – <ul style="list-style-type: none"> i. the location's current character, or ii. for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area, 	The proposal complements the local streetscape character and surrounding vegetation, providing a built form that is largely concealed from street view and predominantly visible from the golf course grounds. Architecturally, the area of Castle Cove exhibits a range of architectural styles reflected in the mix of both contemporary and mid-century modern designs. The proposed architectural treatment and expression is generally reflective of the materials found within the area's natural landscape and built forms including sandstone, brick and glass.

Section	Comment
c. to complement heritage conservation areas and heritage items in the area,	The site is not located within proximity of any heritage conservation areas or heritage items.
d. to maintain reasonable neighbourhood amenity and appropriate residential character by - <ul style="list-style-type: none"> i. providing building setbacks to reduce bulk and overshadowing, and ii. using building form and siting that relates to the site's land form, and iii. adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and iv. considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, 	The proposal promotes excellent design that is appropriate in form, massing and articulation whilst maintaining existing residential amenity. The proposal seamlessly integrates within the site's undulating topography and the wider built form of Castle Cove. An assessment of the built form is provided in Section 4.4 .
e. to set back the front building on the site generally in line with the existing building line,	The ILU building is located at the rear of the site and therefore does not have a clear street address therefore this provision is not applicable.
f. to include plants reasonably similar to other plants in the street, and	Substantial landscaping is proposed and is illustrated in the Landscape Plans at Appendix D and E . It should be noted the proposal has retained trees where practicably. The new planting seeks to complement the existing planting on the street.
g. to retain, wherever reasonable, significant trees,	No trees of significant value are proposed to be removed as a result of the ILU building. An assessment of the trees to be removed has been provided within the Arboricultural Impact Assessment provided at Appendix M .
h. to prevent the construction of a building in a riparian zone.	Not applicable. The proposal is not located within a riparian zone.
2. Visual and acoustic privacy	Acoustic amenity and visual privacy is enhanced by the natural elevation which places the ILUs above the sightlines of the clubhouse. This is further supported by screening incorporated into the balconies. The orientation of balconies and living areas is positioned away neighbouring properties and towards the golf course and bedrooms are located away from the neighbouring clubhouse, with most a significant distance from the adjoining neighbours.
3. Solar access and design for climate	The proposal has been designed to maximise solar access to the ILUs and minimise solar impacts to adjacent properties. As demonstrated in the Architectural Plans (Appendix A) and Design Statement (Appendix B), all ILUs are cross ventilated and most include dual aspects, maximising solar access, cross ventilation and views over the golf course.
4. Stormwater	The proposed development has been designed in a manner that minimises the disturbance and impacts of stormwater runoff on adjoining properties. Refer to the Civil Drawings at Appendix U .
5. Crime Prevention	The proposed development has been designed to incorporate the principles of Crime Prevention Through Environmental Design. All entrances to dwellings will be managed with appropriate locking systems and passive surveillance from balconies and windows. Further guidance on CPTED measures have been provided in Section 4.11 .
6. Accessibility	The proposed development will include accessible pedestrian paths to the ILUs to ensure residents have an accessible path of travel. Further, the vehicular access point will be clearly identifiable through signage on Deepwater Road. The entry lobbies to the ILUs

Section	Comment
	have been appropriately delineated through landscaping and footpaths. The proposed access arrangements are discussed in the Traffic and Transport Assessment Report at Appendix L .
7. Waste management	Dedicated waste management rooms and facilities have been incorporated within the proposed development. Further discussion is provided in the Operational Waste Management Plan at Appendix R .
Division 7 – Non-discretionary development standards	
Section 106 – Application of design principles for seniors housing	Adequate consideration has been given to the principles set out in Schedule 8 as discussed above.
Section 108 – Non-discretionary development standards for independent living units – the Act, s 4.15	
The following are non-discretionary development standards in relation to development for the purposes of independent living units—	
a. no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building,	The proposed development comprises a maximum building height of RL 92.1m which equates to 14260mm. The components that exceed the 9.5m maximum height of buildings development standard relate not just to servicing equipment. It should be noted that the exceedances beyond 9.5 are limited to an area of 7.6% and will not result in the building having a height of more than 11.5m. A Clause 4.6 Variation Request has been prepared which demonstrates why the exceedance is considered appropriate. Refer to Section 4.4.1 for further justification and the Clause 4.6 Variation Request at Appendix G .
b. servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m—	
i. is fully integrated into the design of the roof or contained and suitably screened from view from public places, and	
ii. is limited to an area of no more than 20% of the surface area of the roof, and	
iii. does not result in the building having a height of more than 11.5m.	
c. the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,	The portion of the proposal which relates to the ILU building comprises a total GFA of 2,613.6m ² which equates to a FSR of 0.46:1 when considering the site area and the use in isolation (ie not considering the clubhouse GFA) which is consistent with the 0.5:1 FSR required under the Housing SEPP. Due to the overall exceedance of the FSR development standard of the Willoughby LEP 2023, a Clause 4.6 Variation Request has been prepared which demonstrates why the exceedance is considered appropriate. Refer to Section 4.4.2 for further justification and the Clause 4.6 Variation Request at Appendix F .
d. for a development application made by a social housing provider—at least 35m ² of landscaped area per dwelling,	Not applicable.
e. if paragraph (d) does not apply—at least 30% of the site area is landscaped,	The proposal incorporates 26% of the site area as landscaped area. Whilst this is under 30%, it is evident that landscaping has been maximised across the site which, considering the irregular site area, is considered acceptable. Refer to the Landscape Plans and Statement at Appendix D and E .
f. a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 3m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site,	Yes. 15% of the site area (comprising 861.92m ²) is identified as a deep soil zone. Significant testing has been undertaken to locate at least 65% of the deep soil zone at the rear of the site which is not practicably possible.
g. at least 70% of the dwellings receive at least 2 hours of direct solar access between 9am and 3pm	76.5% of the ILUs receive 2 hours of direct solar access between 9am and 3pm at mid-winter in living rooms and private open spaces. Refer to Architectural Plans provided at Appendix A .

Section	Comment
at mid-winter in living rooms and private open spaces.	
h. for a dwelling in a single storey building or a dwelling located, wholly or in part, on the ground floor of a multi-storey building— i. at least 15m ² of private open space per dwelling, and ii. at least 1 private open space with minimum dimensions of 3m accessible from a living area located on the ground floor.	Partial non-compliance. Refer to Section 4.5.1 for further information.
i. for a dwelling in a multi-storey building not located on the ground floor—a balcony accessible from a living area with minimum dimensions of 2m and— i. an area of at least 10m ² , or ii. for each dwelling containing 1 bedroom—an area of at least 6m ²	Partial non-compliance. Refer to Section 4.5.1 for further information.
j. for a development application made by, or made by a person jointly with, a social housing provider—at least 1 parking space for every 5 dwellings,	Not applicable.
k. if paragraph (j) does not apply—at least 0.5 parking spaces for each bedroom.	Parking has been provided on the basis of 0.5 parking spaces per bedroom, resulting in a total of 24 parking spaces (based on 48 bedrooms). An additional 2 visitor parking spaces have also been provided.
Schedule 4 – Standards concerning accessibility and usability for hostels and independent living units has been considered as part of the Accessibility Report prepared by Jensen Hughes and provided at Appendix K .	

State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development

An assessment of the proposal's compliance with the design principles under Schedule 1 of the *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development* (SEPP 65) has been provided in the Design Statement prepared by Antoniades Architecture and is provided at **Appendix B**.

Seniors Housing Design Guide

In December 2023, the DPE finalised the Seniors Housing Design Guide which replaces the Seniors Living: Urban Design Guidelines for Infill Development, 2004. The new Design Guide helps inform design and assessment of seniors housing proposals and will apply to all seniors housing development. It will be given effect through the Housing SEPP, and therefore, will require the consent authority to consider the guideline when determining a development application for seniors housing.

Whilst the Design Guide is yet to be legislated, it is understood this will occur in due course. An assessment of the key principles provided under Part 2 and 3 of the Design Guide is provided in **Table 8** below.

Table 8 Assessment against Seniors Housing Design Guide 2023

Design Principle	Comment
Part 2 - Guidance Chapters	
1. Designing for Country	The Architectural Design Statement at Appendix B notes the design has considered the findings of the Aboriginal Cultural Heritage Assessment Report ACHAR
2. Care for the planet	The ILUs have been designed to maximise natural sunlight and provide appropriate shading devices to minimise solar heat gain in summer. Further, each of the units have been designed to include cross ventilation to minimise the need for temperature control. Further, all ILUs will be provided with generous private balconies and terraces providing for cross breezes and maximising natural light. A BASIX certificate accompanies the DA (Appendix I) demonstrating compliance with the relevant sustainability controls.
3. Site analysis- environmental response	The proposal has been built to respond to the undulating nature of the property, integrating seamlessly within the existing rock form on the site. The proposal has retained as much vegetation as feasibly possible. Notwithstanding this, a significant landscaping strategy has been prepared to tie the site into its green surroundings.
4. Site analysis – urban response	The proposal has been designed to take cues from the surrounding neighbourhood, introducing materiality that is consistent with the existing built forms within Castle Cove. The portion of the site that relates to the ILU's is positioned within the rear of the site and is located 3m below the adjoining residential development, minimising the bulk and scale of the building. It is acknowledged the adjoining allotment located along most of the site's eastern boundary is a more dense, low rise apartment typology which varies from the typical detached residential dwellings and aligns more with the design of the ILU building.
5. Heritage	<p>The site is not located within proximity of any European heritage conservation areas or heritage items.</p> <p>An ACHAR has been prepared by Unearthed. A search of the AHIM's database found there are no registered Aboriginal sites within the study area. At the time the report was prepared, five Aboriginal organisations and individuals registered an interest in the project and participated in the consultation, these included:</p> <ul style="list-style-type: none">• Didge Ngunawal Clan (DNC);• Mundawari Heritage Consultants;• Julia Ann Narayan;• AI Indigenous Services; and• Murra Bidgee Mullangari. <p>Significant research has shown Castle Cove was a significant landscape for Aboriginal people and so there are anticipated Aboriginal objects and evidence of Aboriginal occupation within the lower slope of the site surrounding the sandstone outcrop. It was recommended Archaeological test excavations be undertaken to inform the construction process, design and management of the site.</p>
6. Care, wellbeing and community	<p>The inclusion of communal open space which includes facilities such as a BBQ area, bocci field, and vegetable garden will encourage social interaction among residents and visitors in a safe and secure way that promotes community building.</p> <p>Universal design has been a consideration in the design of the ILUs with 100% of the units considered 'adaptable units' and therefore will be able to be modified to accommodate</p>

	the changing needs of residents as they age and their needs change. Two (2) of the ILUs are classified as accessible.
7. Design for physical ageing and dementia	The proposal provides a typology of seniors housing that transitions away from large institutional design settings typically seen for seniors housing development to create a more intimate setting for future aging residents.

Part 3 – Density and Related Design Principles

9.0 Determining Density	The proposal is considered medium density under the Guide criteria as the FSR relating to the ILU component is under 0.5:1.
10. Designing for different densities	The proposed development is located on land zoned R2 Low Density Residential and therefore surrounding development is largely comprised of low scale residential development. The proposal seeks to provide 2 and 3 bedroom units within a built form sympathetic to the low rise scale of surrounding development. The Apartment Design Guideline (ADG) has been considered as the proposed comprises three (3) or more storeys and more than four (4) dwellings it is noted the development is generally consistent with the design criteria and achieves a high level of residential amenity.

15. Independent Living for Medium Density – Design Principles

15.1 Neighbourhood amenity and streetscape	The ILUs are located within the rear portion of the site and therefore do not have a clear street address. The proposed bulk and scale of the ILU building has been designed in a way to respond to the site's undulating topography while also being sympathetic to the low rise scale of surrounding development. The change in level between the site and neighbouring residential development, coupled with the landscaped buffer located on the site's eastern boundary will maximise visual privacy. It is the proponent's intention to retain as many trees located on the site, especially those located between the property at 76 Deepwater Road and the site.
15.2 Solar access and design principles	The units will receive ample natural sunlight during mid-winter between 9:00am and 3:00pm and appropriate shading devices will be installed to minimise solar heat gain in summer. All residences are single levels and will have natural ventilation throughout the internal space, minimising the need for air-conditioning for temperature control. Further, all ILUs will be provided with generous private balconies and terraces providing for cross breezes and maximising natural light.
15.3 Stormwater	The proposed development has been designed in a manner that minimises the disturbance and impacts of stormwater runoff on adjoining properties. Refer to the Civil and Stormwater Plans at Appendix U .
15.4 Crime prevention	The proposed development facilitates opportunities for casual passive surveillance with the use of terraces and communal open space. Further information relating to CPTED matters is provided in Section 4.11 .
15.5 Accessibility	The proposal includes a pedestrian an accessible path of travel from Deepwater Road. The entrance to the development will be easily identifiable and clearly delineated through the incorporation of wayfinding, landscaping and footpaths. An Access Assessment Report has been prepared by Jensen Hughes and provides an assessment of the proposal against the Deemed-to-Satisfy provisions of the Building Code of Australia (BCA) 2019. The Report concludes the proposal complies or is capable of complying with the relevant BCA standards.
15.6 Waste management	Dedicated waste management rooms and facilities have been incorporated within the proposed development. Further discussion is provided in the Waste Management Plan at Appendix R .

4.2.2 Apartment Design Guide

An assessment of the proposal's consistency with the Part 3 and 4 of the ADG objectives and design criteria is provided in **Table 9** below. For full assessment against the ADG including responses to design guidance, please refer to **Appendix CC**.

Table 9 Assessment against Apartment Design Guide

Design Criteria		Proposal
Part 3 Siting the Development		
3D Communal and Public Open Space		
Objective		
An adequate area of communal open space is provided to enhance residential amenity and to provide opportunities for landscaping		✓
Design Criteria		Variation proposed and considered acceptable. Refer to Section 4.5.2 .
Communal open space has a minimum area equal to 25% of the site		
Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9 am and 3 pm on 21 June (mid-winter)		✓
3E Deep Soil Zones		
Objective		
Deep soil zones provide areas on the site that allow for and support healthy plant and tree growth. They improve residential amenity and promote management of water and air quality.		✓
Design Criteria		
Deep soil zones are to meet the following minimum requirements:		
Site Area	Minimum Dimensions	Deep Soil Zone (% of site area)
Less than 650m ²	-	7%
650m ² – 1,500m ²	3m	
Greater than 1,500m ²	6m	
Greater than 1,500m ² with significant existing tree cover	6m	
		Deep soil has been provided in accordance with the Housing SEPP. Refer to Section 4.2.1 .
3F Visual Privacy		
Objective		
Adequate building separation distances are shared equitably between neighbouring sites, to achieve reasonable levels of external and internal visual privacy.		✓
Design Criteria		
Separation between windows and balconies is provided to ensure visual privacy is achieved. Minimum required separation distances from buildings to the side and rear boundaries are as follows:		
Building Height	Habitable rooms and balconies	Non-habitable rooms
Up to 12m (4 storeys)	6m	3m
Up to 25m (5-8 storeys)	9m	4.5m
Over 25m (9+ storeys)	12m	6m
		Partial compliance. Refer to Section 4.4.2 .
3J Bicycle and Car Parking		
Objective		

Car Parking is provided based on proximity to public transport in metropolitan Sydney and centres in regional areas

Design Criteria

For development in the following locations:

- on sites that are within 800 metres of a railway station or light rail stop in the Sydney Metropolitan Area; or
- on land zoned, and sites within 400 metres of land zoned, B3 Commercial Core, B4 Mixed Use or equivalent in a nominated regional centre

The minimum car parking requirement for residents and visitors is set out in the Guide to Traffic Generating Developments, or the car parking requirement prescribed by the relevant council, whichever is less.

Parking requirements have been calculated based on the Housing SEPP for the ILUs and based on a bespoke rate for the clubhouse. Refer to Section 4.9 for further information

The car parking needs for a development must be provided off street.

Part 4 Designing the Buildings

4A Solar and Daylight access

Objective

To optimise the number of apartments receiving sunlight to habitable rooms, primary windows and private open space.

✓

Design Criteria

In all other areas, living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 3 hours direct sunlight between 9am and 3 pm at mid-winter.

Solar access has been provided in accordance with the Housing SEPP which requires 70% of ILUs in a building to receive a minimum of 2 hours direct sunlight in the private open space and living areas between 9 am and 3 pm at mid- winter. The proposal includes 76.5% of the proposed ILUs meet the solar requirements and therefore the proposal is compliant with the Housing SEPP.

A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3 pm at mid-winter.

All ILUs will receive direct sunlight (0% will receive no sunlight)

✓

4B Natural Ventilation

Objective

The number of apartments with natural cross ventilation is maximised to create a comfortable indoor environment for residents

✓

Design Criteria

At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building. Apartments at ten storeys or greater are deemed to be cross ventilated only if any enclosure of the balconies at these levels allows adequate natural ventilation and cannot be fully enclosed.

✓

All ILUs are naturally cross ventilated.

4C Ceiling Height

Objective

Ceiling height achieves sufficient natural ventilation and daylight access

✓

Design Criteria

Measured from finished floor level to finished ceiling level, minimum ceiling heights are:

Minimum ceiling height	
Habitable rooms	2.7m
Non-habitable	2.4m

✓

For 2 storey apartments	2.7m for main living area floor 2.4m for second floor, where its area does not exceed 50% of the apartment area
Attic spaces	1.8m at edge of room with a 30 degree minimum ceiling slope
If located in mixed use areas	3.3m for ground and first floor to promote future flexibility of use

These minimums do not preclude higher ceilings if desired.

4D Apartment Size and Layout

Objective

The layout of rooms within an apartment is functional, well organised and provides a high standard of amenity

✓

Design Criteria

Apartments are required to have the following minimum internal areas:

Apartment Type	Minimum internal area
Studio	35m ²
1 bedroom	50m ²
2 bedroom	70m ²
3 bedroom	90m ²

✓

All units are designed to exceed the requirement of minimum internal area requirements.

The minimum internal areas include only one bathroom. Additional bathrooms increase the minimum internal area by 5m² each.

A fourth bedroom and further additional bedrooms increase the minimum internal area by 12m² each.

Every habitable room must have a window in an external wall with a total minimum glass area of not less than 10% of the floor area of the room. Daylight and air may not be borrowed from other rooms.

✓

Objective

Environmental performance of the apartment is maximised

✓

Design Criteria

Habitable room depths are limited to a maximum of 2.5 x the ceiling height.

✓

In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window.

✓

Objective

Apartment layouts are designed to accommodate a variety of household activities and needs

✓

Design Criteria

Master bedrooms have a minimum area of 10m² and other bedrooms 9m² (excluding wardrobe space).

✓

Bedrooms have a minimum dimension of 3m (excluding wardrobe space).

✓

Living rooms or combined living/dining rooms have a minimum width of:

- 3.6m for studio and 1 bedroom apartments
- 4m for 2 and 3 bedroom apartments

✓

The width of cross-over or cross-through apartments are at least 4m internally to avoid deep narrow apartment layouts.

✓

4E Private Open Space and Balconies

Objectives

Apartments provide appropriately sized private open space and balconies to enhance residential amenity

✓

Design Criteria

All apartments are required to have primary balconies as follows:

Dwelling Type	Minimum Area	Minimum depth
Studio apartment	4m ²	-
1 bedroom apartment	8m ²	2m
2 bedroom apartment	10m ²	2m
3+ bedroom apartment	12m ²	2.4m

Variation proposed and considered acceptable. Refer to **Section 4.5.1.**

The minimum balcony depth to be counted as contributing to the balcony area is 1m.

For apartments at ground level or on a podium or similar structure, a private open space is provided instead of a balcony. It must have a minimum area of 15m² and a minimum depth of 3m.

Variation proposed and considered acceptable. Refer to **Section 4.5.1.**

4F Common Circulation and Spaces

Objective

Common circulation spaces achieve good amenity and properly service the number of apartments

✓

Design Criteria

The maximum number of apartments off a circulation core on a single level is eight (8).

✓

4G Storage

Objective

Adequate, well designed storage is provided in each apartment.

✓

Design Criteria

In addition to storage in kitchens, bathrooms and bedrooms, the following storage is provided:

Dwelling Type	Minimum Area
Studio apartment	4m ²
1 bedroom apartment	6m ²
2 bedroom apartment	8m ²
3+ bedroom apartment	10m ²

✓

At least 50% of the required storage is to be located within the apartment.

4.2.3 Willoughby Local Environmental Plan 2012

An assessment of the proposal against the Willoughby LEP 2012 is provided in **Table 10** below.

Table 10 Assessment against Willoughby Local Environmental Plan 2012

Clause	Control	Proposal's Compliance
Clause 2.3 <i>Zone objectives and land use table</i>	R2 Low Density Residential	The site is zoned R2 Low Density Residential which technically prohibits seniors housing and registered clubs. Despite this, the seniors housing land use is permissible under Division 1 Part 5 of the Housing SEPP and the registered club use is permissible as an additional permitted use on this site under clause 2.5 and Schedule 1 of the LEP .
Clause 4.1 <i>Minimum subdivision lot size</i>	835m ²	<p>The proposal seeks approval for a Torrens Title subdivision of the existing Lot 1 in DP 610360 which is permitted in this zone under Willoughby LEP 2012 and would provide for the separation of titles for the total site area into two allotments limited in stratum. The proposed allotments include:</p> <ul style="list-style-type: none"> Lot 1 (clubhouse): 3,022m² Lot 2 (ILU site): 2,706m² <p>Two (2) easements are also proposed for right of access and services. Refer to Appendix AA for more detail.</p> <p>It is to be noted existing Lot 510 in DP200636 is also to be consolidated within proposed Lot 1.</p> <p>The allotments are compliant with the Clause 4.1 minimum subdivision lot size.</p>
Clause 4.3 <i>Height of buildings</i>	8.5m	<p>The Willoughby LEP 2012 maximum height of building control applies to the clubhouse building.. The maximum height of the clubhouse is 7.7m and therefore remains compliant with Clause 4.3 of the LEP.</p> <p>The seniors housing building is subject to an alternate maximum height of buildings development standard under the Housing SEPP (discussed in Section 4.2.1).</p>
Clause 4.4 <i>Floor space ratio</i>	0.4:1	The proposed development exceeds the maximum floor space ratio with a total GFA of 3,558m ² resulting in an equivalent FSR of 0.62:1. A Clause 4.6 Variation Request addressing the variation is provided at Appendix F .
Clause 4.6 <i>Exceptions to development standards</i>		
Part 5 – Principal Development Standards		
Clause 5.11 <i>Bush fire hazard reduction</i>	Part of the site located within the Vegetation Buffer	The site is identified as being partly within the vegetation buffer and therefore classified as Bush Fire Prone Land. A Bushfire Hazard Assessment has been prepared and is provided at Appendix O . It is acknowledged the DA will require approval under the Rural Fires Act 1997.
Part 6 – Additional Local Provisions		
Clause 6.1 <i>Acid sulfate soils</i>	Class 5	The site is not located in close proximity to any land identified as class 1, 2, 3 or 4. No further assessment is required.
Clause 6.2 <i>Earthworks</i>	Earthworks require development consent and matters to be considered by Council.	The proposed development will likely require bulk excavations up to approximately 7m (ILUs) and 5m (clubhouse) below ground level to accommodate the ground level carparking associated with the clubhouse, the ILU fire stairs as well as the ILU basement carpark.
Clause 6.3 <i>Urban Heat</i>		The proposed development has been designed to minimise urban heat impacts. The units will receive ample natural sunlight during mid-winter between 9:00am and 3:00pm and appropriate shading devices will be installed to minimise solar heat gain in summer. All residences are single levels and will have natural ventilation throughout the internal space, minimising the need for air-conditioning for temperature control.

4.2.4 Willoughby Development Control Plan 2023

In accordance with Section 4.15(1)(a)(iii) of the EP&A Act the proposed development considers and is consistent with the objectives of the Willoughby Development Control Plan 2023 and the relevant development controls. A detailed consistency assessment is provided in **Appendix BB**.

As required under Section 4.15(3A) of the EP&A Act, a consent authority is required to apply DCP provisions flexibly and allow reasonable alternative solutions that achieve the objects of those standards.

4.3 Key Issues and Likely Impacts

This section details the key planning issues and likely environmental, social, and economic impacts of the development on the natural and built environment in accordance with Section 4.15(1)(b) of the EP&A Act.

For all other matters please refer to the **Appendix** section.

4.4 Built Form

The proposal is well suited to its location, with the design responding to the site's context and undulating topography. The scale of the proposal is generally consistent with the Willoughby LEP 2012 and the Housing SEPP which guide the bulk and scale of the built form, and with the SEPP providing the key guidance for the ILUs.

It is noted that two (2) Clause 4.6 Variation Requests have been prepared related to variances to the FSR development standard applicable under the Willoughby LEP 2012 and the height of building development standard applicable under the Housing SEPP.

4.4.1 Building height

Clubhouse

The maximum building height applicable to the clubhouse use is specified by the Willoughby LEP 2012 as 8.5 metres. The proposal as demonstrated in the Architectural Plans at **Appendix A** complies with the maximum height limit, proposing a maximum height of building of 8.3m.

ILU Building

The maximum building height applicable to the ILUs is specified by the Housing SEPP. Section 84 of the Housing SEPP stipulates the general development standards that relate to all seniors housing, noting a maximum building height of 9.5 metres (without servicing equipment) or 11.5m (with servicing, providing it is limited to an area of no more than 20% of the surface area of the roof). The full clause is referred to in **Table 7** (Housing SEPP) above.

The proposed development generally complies with this maximum building height control of 9.5m, with only minor building elements that exceed the height plane, in only two (2) portions of the parapet applying to the roof of one ILU and on one edge/corner of the building ILUs. The reason for the exceedance is largely attributed to the site's topographical variations, which are demonstrated in the plane dropping from an RL of 84.1 to RL 67 over the course of the site's elevation and with the exceedances occurring in the undulations within this ground plane. These elements are consistent with the scale and height of the remainder of the building. The exceedances are illustrated in the 9.5m height plane provided at **Figure 28**.

A Clause 4.6 Variation Request has been prepared by Ethos Urban and is provided at **Appendix G**. The request demonstrates that, notwithstanding the variation from the height development standard:

- The proposed development achieves the objectives of the building height development standard using the objectives at clause 4.3 of the Willoughby LEP 2012:
 - The design responds to the undulating topography and accommodates the existing rock formations on the site, resulting in four (4) minimal height variations related to corners of roofs and an awning in order to maintain levels and accessibility within the design;
 - The proposal has been sited in a way to maximise separation distances from the adjoining properties. Any relocation of the form closer to the adjoining properties may result in a greater level of compliance related to height but will impact visual privacy and require the removal of floor space;
 - The proposed building height will not change the existing character nor hinder the future character of the area. The ILUs will replace the existing clubhouse form, which is currently in poor condition, with a quality design located at the rear of the site and setback from street view; and

- The proposed development demonstrates that there are sufficient environmental planning grounds to vary the control in this instance because:
 - The proposed height variations are minor in nature, representing a maximum breach of 4.425m limited to approximately 73.97m² which comprises approximately 5.28% of the total roof footprint roof area;
 - The proposed height variations will largely be screened from view due to the location of the servicing equipment and therefore will have negligible visual impact on adjoining properties;
 - Whilst the height variations will visible from the Golf Course, they are considered to contribute to the high visual quality of the development, providing for elements of articulation, improving the overall perception of the bulk and scale;
 - The proposed height variations are located a significant distance from adjoining neighbours and will not result in any additional instances of direct overlooking from adjoining neighbours;
 - The proposed height variations will result in negligible overshadowing impacts which will be contained within the Golf Course and on the site itself and will not impact adjoining neighbours; and
 - Strict compliance would require a re-design within an already significantly constrained site and result in the potential loss of ILUs.

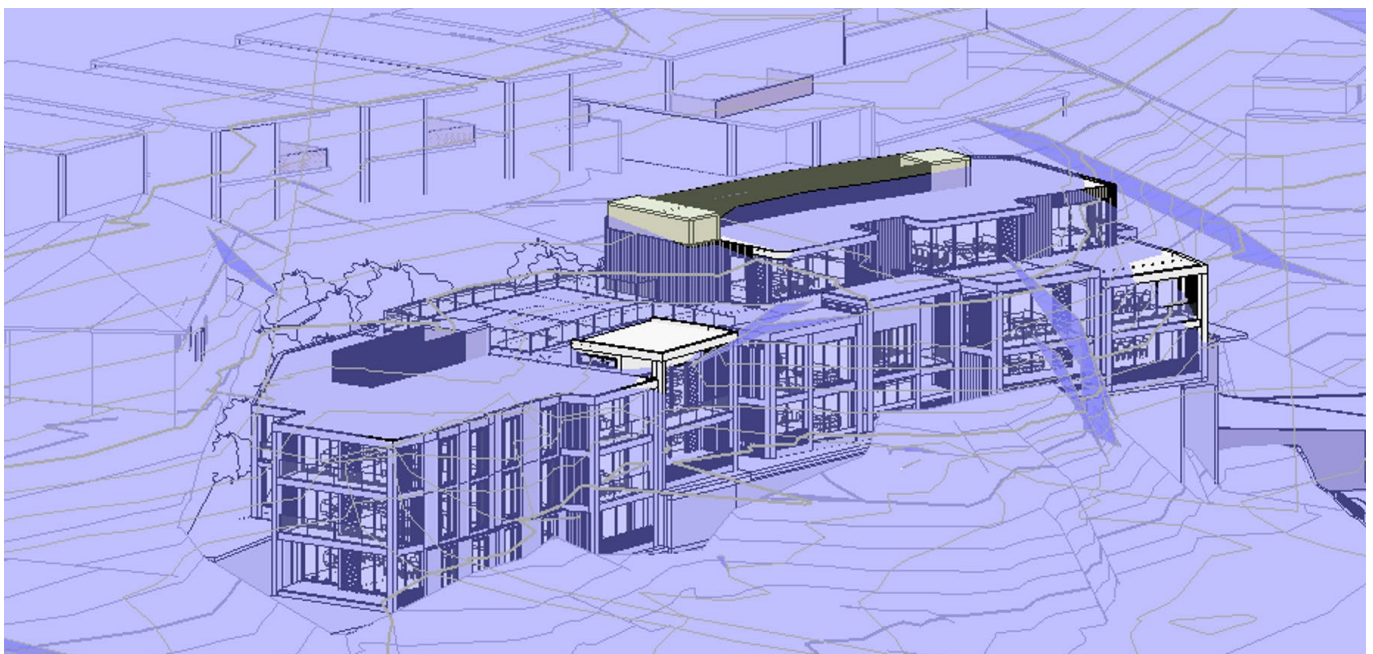


Figure 28 Building elements which vary the 9.5m height shown in white (servicing equipment subject to 11.5m height of buildings control)

Source: Antoniades Architects



Figure 29 ILU section showing property at 15 Amaroo Avenue

Source: Antoniades Architects

4.4.2 Floor Space Ratio

The Willoughby LEP 2012 specifies the maximum FSR on the site of 0.4:1. The clubhouse component comprises a total GFA of 944.2m² while the ILUs comprise a total GFA of 2,613.6m² resulting in a total GFA of 3,558m² and resultant FSR of 0.62:1 for the site, representing an exceedance of 55%.

When considered in isolation, the clubhouse component seeks approval for a GFA that is lower than that of the existing clubhouse, from 975m² (existing) to 944m² (proposed), a net reduction of 31m².

Section 108 of the Housing SEPP provides a non-discretionary FSR standard of 0.5:1 (for which the FSR std cannot be used as a basis for refusal if complied with, or otherwise requires merit assessment). As the ILU component seeks approval for a total GFA of 2,613.6m² which equates to an FSR of 0.46:1 (when considered in isolation), it technically complies with Section 108 of the Housing SEPP and is therefore considered appropriate.

Notwithstanding the above, the development as a whole exceeds the FSR development standard contained within the Willoughby LEP 2012 and therefore a Clause 4.6 Variation Request has been prepared by Ethos Urban and is provided at **Appendix F**. The request demonstrates that, notwithstanding the variation from the height development standard:

- The proposed development achieves the objectives of clause 4.4 of the Willoughby LEP 2012:
 - The proposed intensity of development is suitable in terms of the land uses, which can be appropriately managed;
 - The proposed development will provide a co-location of uses which will be mutually beneficial and has been appropriately master planned specific to the site opportunities and constraints for those land uses;
 - The proposal will result in an acceptable traffic generation that can be accommodated by the surrounding road network and intersections;
 - The bulk and scale of the proposed development has been distributed across the site and is responsive to topography to ensure it is sympathetic with the surrounding built forms and natural landscape;
 - The proposal will provide for community floor space that is ancillary to the Castle Cove Golf Course and therefore provides wider public benefits beyond the site itself ; and
 - The proposal will not impact on the growth of commercial development of the city centre of Chatswood nor will it impact the city centre's primary character and land use, which is a specific objective of the FSR development standard, though of less relevance in this instance.
- The proposed development demonstrates that there are sufficient environmental planning grounds to vary the control in this instance because:
 - The proposal has been designed in a way to responds specifically to the site's undulating topography and unique allotment shape, with the placement of building bulk and floorspace to minimise amenity impacts to the surrounding area;
 - The FSR of the ILU component, when considered in isolation, meets the FSR non-discretionary standard under the Housing SEPP 2021 (0.46:1 when the SEPP non discretionary standard is 0.5:1);
 - The ILUs will provide for the provision of seniors housing within Castle Cove (which is an in demand form of housing) and which will provide residents an opportunity to downsize and age in place;
 - The clubhouse component comprises a gross floor area that is 31m² less than the existing built form and is considered to generate similar traffic generation. It is expected that the redevelopment will also encourage more walk-in users from ILUs and local residents, thereby allowing varied and sustainable forms of transport to access the site;
 - Typically clubhouses, which are considered to be an ancillary use to a golf course, have been located on the same site as the golf course and which are not subject to a floor space ratio control (due to the recreation zoning). Therefore, the proposal is responsive the SEPP ILU non-discretionary development standard (0.5:1) and the club should be afforded the flexibility apparent and appropriate to other metropolitan clubhouse developments; and
 - The proposal will enable the orderly and economic use and development of the land, resulting in the redevelopment of the clubhouse which exhibits clear signs of aging and portions unusable due to its poor condition. The orderly redevelopment of the site therefore offers a clear public benefit in terms of much needed housing, a more sustainable and design responsive club form, and a new facility for club members and the wider community.

4.4.3 Setbacks and separation

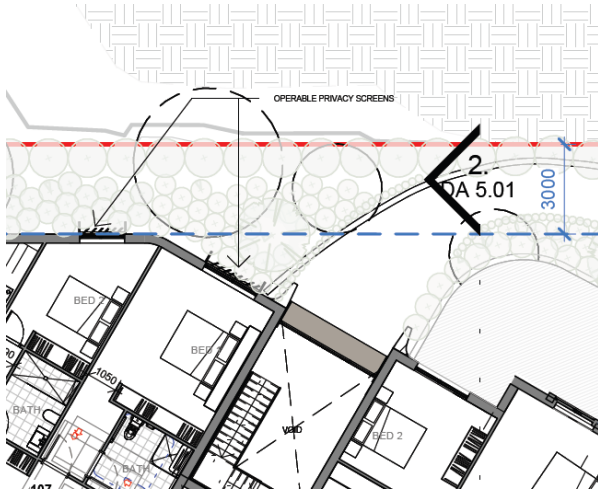
It is noted that there are no applicable setback controls within the Willoughby DCP 2023 which relate to the proposed uses and so a merit-based approach to setbacks has been undertaken for the site, also considering the ADG design criteria. A summary of the proposed setbacks and reasoning why they are considered appropriate are provided in **Table 11** below. Refer to the Architectural Plans for further details (**Appendix A**).

Table 11 Proposed setbacks

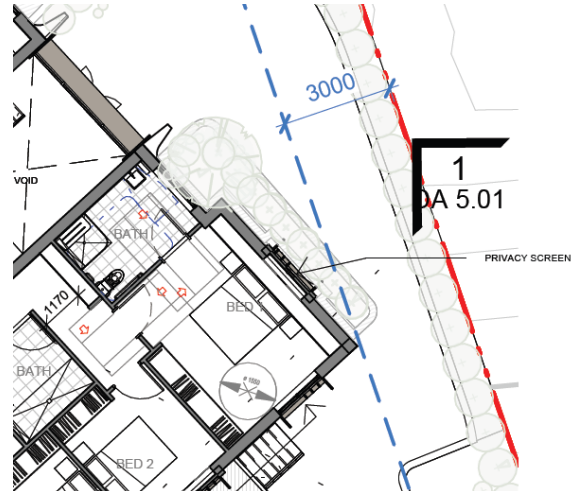
Use 'Table Heading' type style	Setback	Reasoning
ILUs		
North setback	6.8m	A 6.8m setback has been provided from the site's northern boundary, providing an adequate distance between the ILU building and the adjacent residential property at 13 Amaroo Avenue.
Eastern setback	3m to 19.58m	A varied setback is provided from the site's eastern boundary (between 3m and 19.58m), maximising the distance between the ILU building and the neighbouring residential dwellings. Further justification around why the minimum 3m setback is considered appropriate is provided below.
Western setback (Golf Course)	0m to 8.3m	A 0m north eastern setback has been provided for most of the ILU building's western elevation. Due to the allotment's irregular shape, an irregular setback with a maximum dimension of 8.3m is provided and accommodates existing sandstone massing on the site.
Clubhouse		
North eastern setback (Golf Course)	0m	A 0m north-eastern setback has been provided and is considered appropriate given the site's interface with the Golf Course.
South-eastern setback	4.3m to 6.78m	A 4.3m to 6.78m setback from the site's south-eastern boundary to the vehicle ramp which provides for an adequate space between the clubhouse and the adjacent residential property at 76 Deepwater Road to include a pedestrian pathway and landscaping.
South-western setback (Deepwater Road)	3.1m to 4.88m	A 6m setback has been provided on the site's Deepwater Road frontage which has been established considering the existing setbacks within the surrounding locality. The consistency of the building setback with the neighbouring dwelling (76 Deepwater Road) is shown in the renders (Figure 11 and Figure 12) in Section 3.0 .
North-western setback (Park connected to Golf Course)	0m to 6.4m	A 0 to 6.4m north western setback has been provided, where the site adjoins parkland which is zoned RE1 public recreation.

ILU Building - Eastern setback

It is a statutory requirement that the ADG is considered in the design of buildings which comprise three (3) or more storeys and four (4) or more dwellings. As noted in **Section 4.2.2** and **Table 9**, the ADG requires a total separation distance of 12m between habitable and habitable rooms for dwellings below 12m. Generous setbacks have been provided along the central portion of the eastern setback, while given the configuration of the allotment, the proposal does include minor inconsistencies with the ADG on the narrow sections of the lot and for two ILU dwellings only, where habitable rooms are located approximately 3m from the site's boundaries. This includes ILU 107 located 3m from the site's boundary with the neighbouring dwelling at 15 Amaroo Avenue and ILU 101 (refer to **Figure 30** and **Figure 31**). Windows on the ILU elevations have privacy screens to obscure views to and from the adjacent buildings and ensure privacy for all residences. The level changes at the site boundaries further reduce any direct line of sight between these ILUs and neighbours.



ILU 107 (northern portion of ILU building)



ILU 101 (southern portion of ILU building)

Figure 30 ILUs impacted by non-consistency with ADG building separation control

Source: Antoniades Architectures

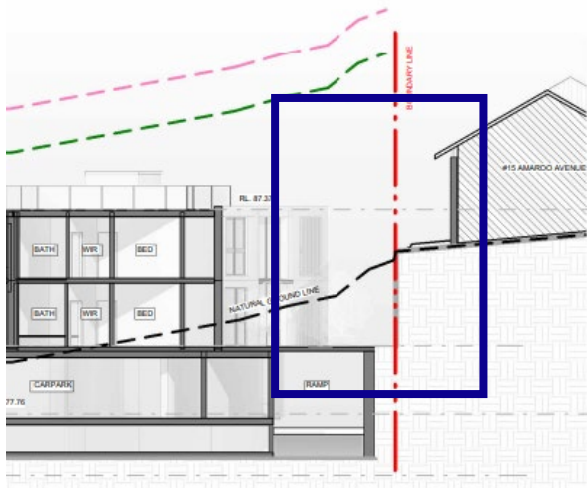


Figure 31 ILU 107 (shown in background) facing 15 Amaroo Avenue

Source: Antoniades Architects

4.4.4 Overshadowing Impacts

Shadow diagrams have been undertaken by Antoniades Architects considering the overshadowing impacts of the proposal during the mid-winter solstice between 9:00am and 3:00pm (**Appendix A**). As demonstrated in the diagrams in **Figure 32**, the future built form on the site is expected to result in a shadow cast primarily south over the site and Deepwater Road. Minor portions of overshadowing can be seen on the adjoining sites (at 3PM) which is not considered to impact on the amenity of adjacent residents.

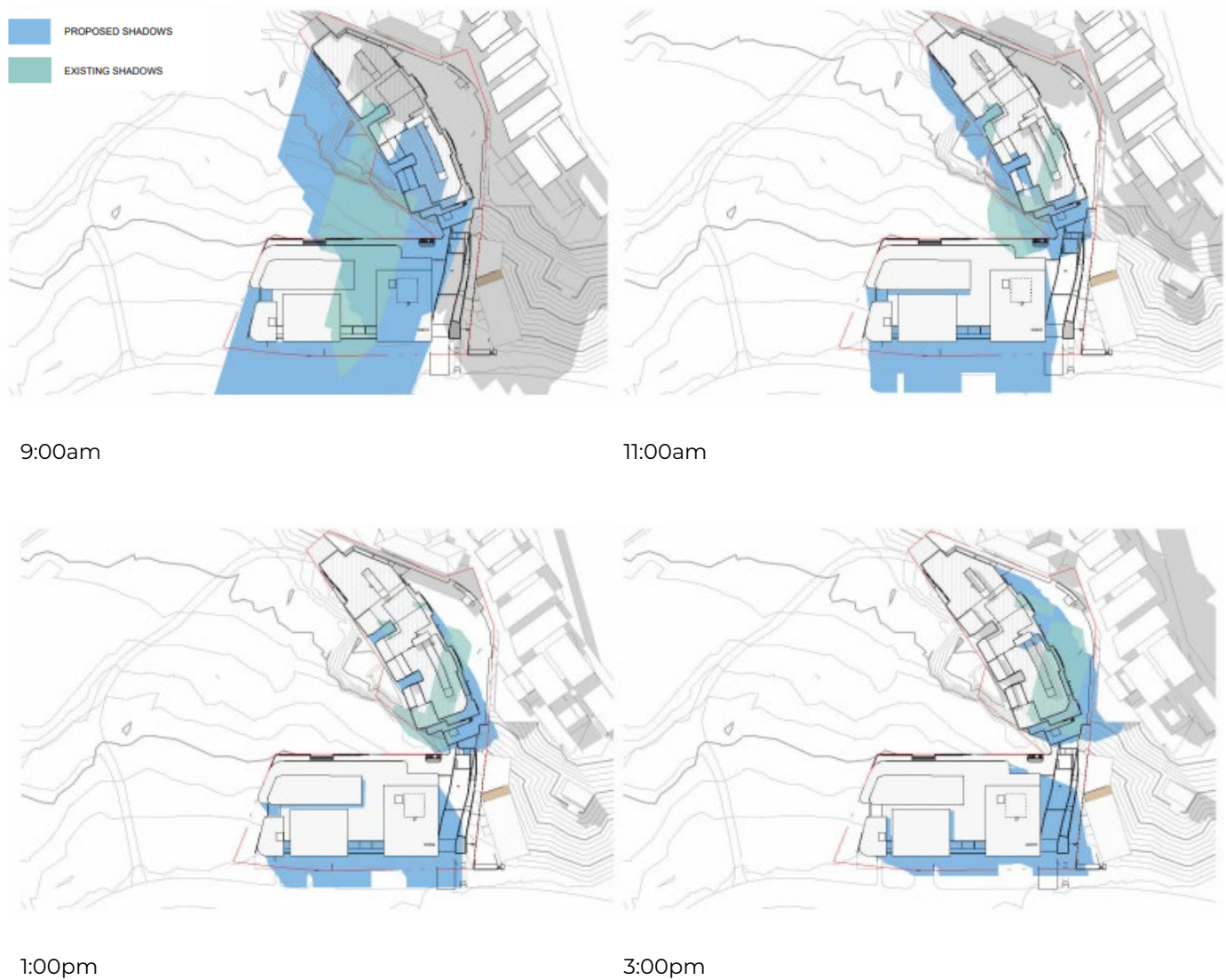


Figure 32 *Proposed overshadowing diagrams during mid-winter solstice*

Source: Antoniades Architects

4.5 Residential Amenity

The following sections talk to the proposal's provision of private and communal open space. The site is located directly adjacent to the Castle Cove Golf Course and it is likely residents of the ILUs will be members of the club and users of the Golf Course which will provide for significant neighbouring recreational and visual amenity.

Given the configuration of the site's allotment and the existing site constraints, the proposal has provided for significant private open spaces in the form of terraces and balconies. Whilst not a requirement under the Housing SEPP, the proposal has provided a 126.5m² of communal space which provides a setback to adjoining neighbours and provides an opportunity for social interaction amongst the ILU residents.

4.5.1 Private Open Space

Section 108 of the Housing SEPP relates to non-discretionary standards applicable to ILUs. Whilst these are not required to be complied with, the proposal seeks to align as closely as possible with these provisions. An analysis of the minimum areas and dimensions applicable to private open space has been undertaken, also considering the design criteria of the ADG (refer to **Table 12**).

In relation to private open space, Section 108(h) applies to ground level ILUs and requires a minimum of 15m² of private open space per dwelling and at least 1 private open space with minimum dimensions of 3m accessible from a living area. The analysis provided indicates all units but one (Unit G07) are provided with adequate private open space beyond the standard. Unit G07's provision of private open space is considered appropriate as the unit meets the ADG requirement of 10m² (applicable to 2-bedroom apartments). Six (6) of the eight (8) ILUs located on the Lower Ground Level and the Ground Level (both considered ground level due to the site's change in level), do not meet the 3m minimum dimension however three (3) of the units which do not comply with the Housing SEPP minimum dimension, do meet the ADG minimum depth of 2m. Notwithstanding, all ILUs located on the Lower Ground Level and Ground Level benefit from significantly sized private open spaces (outlined in **Table 12**) and are within close proximity to the adjacent communal open space.

Section 108(i) applies to dwellings located above ground floor and requires dwellings not located on the ground floor be provided with a balcony accessible from a living area with a minimum dimension of 2m and an area of at least 10m². The analysis indicates all units above ground level are provided with adequate private open space beyond what is required under Section 108(i). Only one (1) ILU (Unit 106) did not meet the minimum depth requirement of 2m which also did not meet the ADG design criteria of 2m (for 2 bedroom dwellings). Unit 105 met the SEPP criteria but did not meet the ADG design criteria of 2.4m as it related to a 3-bedroom unit. The variations are considered acceptable given the provision of private open space in most cases either meets or considerably exceeds what is recommended.

In summary, while some private open spaces related to the ILUs may not meet certain minimum dimensions within the Housing SEPP and ADG Design Criteria, all ILUs are provided with significantly sized terraces, some of which quadruple the area requirements. Further, most of the apartments are provided with two (2) terraces spaces. Further, it should be acknowledged 88% of the ILUs are provided with views to the Castle Cove Golf Course.

Table 12 Analysis of ILU private open space areas

Legend	Consistent	Non Consistent				
Unit	Private Open Space	ADG Minimum area	SEPP Minimum area	ADG Minimum depth	SEPP Minimum Dimension	SEPP Solar Access
Lower Ground Level						
Unit LG01	Terrace 1: 2.1m x 8.5m Terrace 2: 1.5m x 5.8m Total = 25.05m²	12m ²	15m ²	2.4m	3m	
Ground Level						
Unit G01	Terrace 1: 2.7m x 7.3m Total = 19.71m²	12m ²	15m ²	2.4m	3m	2 hours of direct sunlight achieved between 2:45pm and 5pm.
Unit G02	Terrace 1: 2.7 X 7.3 Terrace 2: 35.25m ² Total = 54.96m²	12m ²	15m ²	2.4m	3m	2 hours of direct sunlight achieved between 2:45pm and 5pm.
Unit G03	Terrace 1: 4m x 3m Terrace 2: 36.51m ² Total = 48.51m²	12m ²	15m ²	2.4m	3m	
Unit G04	Terrace 1: 4m x 3m Terrace 2: 35.18m ² Total = 47.18m²	12m ²	15m ²	2.4m	3m	
Unit G05	Terrace 1: 2.2m x 7.4m Terrace 2: 33.31m ² Total = 49.59m²	12m ²	15m ²	2.4m	3m	2 hours of direct sunlight achieved between 2:45pm and 5pm.
Unit G06	Terrace 1: 2.1m x 8m Terrace 2: 5.7m x 1.5m Total = 25.35m²	12m ²	15m ²	2.4m	3m	
Unit G07	Terrace 1: 4.7m x 2.6m Total = 12.22m²	10m ²	15m ²	2m	3m	

Unit	Private Open Space	ADG Minimum area	SEPP Minimum area	ADG Minimum depth	SEPP Minimum Dimension	SEPP Solar Access
Level 1						
Unit 101	Terrace 1: 2.7m x 7.3m Total = 19.71m²	12m ²	10m ²	2.4m	2m	2 hours of direct sunlight achieved between 2:45pm and 5pm.
Unit 102	Terrace 1: 2.7m x 7.3m Total = 19.71m²	12m ²	10m ²	2.4m	2m	
Unit 103	Terrace 1: 4m x 3m Total = 12m²	12m ²	10m ²	2.4m	2m	
Unit 104	Terrace 1: 4m x 3m Total = 12m²	12m ²	10m ²	2.4m	2m	
Unit 105	Terrace 1: 2.2m x 7.4m Total = 16.28m²	12m ²	10m ²	2.4m	2m	
Unit 106	Terrace 1: 1.9m x 8m Terrace 2: 5.7m x 1.5m Total = 23.75m²	12m ²	10m ²	2m	2m	
Unit 107	Terrace 1: 4.7m x 2.6m Total = 12.22m²	10m ²	10m ²	2m	2m	
Level 2						
Unit 201	206m²	12m ²	10m ²	2.4m	2m	
Unit 202	77m²	12m ²	10m ²	2.4m	2m	

4.5.2 Communal Open Space

The ADG design criteria requires 25% of the site area to be used as communal open space, which equates to a requirement for 1,430m². The proposal provides 126.5m² of communal open space equating to 2.2% of the total site area that is accessible on the Ground Level of the ILU portion of the site. The ADG notes, where developments are unable to achieve the design criteria, sites within dense urban areas should:

- *provide communal spaces elsewhere such as a landscaped roof top terrace or a common room*
- *provide larger balconies or increased private open space for apartments*
- *demonstrate good proximity to public open space and facilities and/or provide contributions to public open space*

It is to be made a consideration that the site is located within a dense urban area given the highly built-up nature of the area, despite being low rise. As the proposal provides significant private open space for each ILU as evidenced in **Table 12** above, the provision of communal open space is considered acceptable. Further, the ILUs are located adjacent to a public golf course. It is likely residents of the ILUs will be members of the clubhouse or can be provided with casual access to the green space given it is a public golf course.

It should be noted there is no numerical requirement related to the provision of communal open space in the Housing SEPP for ILUs.

Solar access to communal open space

It is further acknowledged that the ADG design criteria requires communal open space to achieve a minimum of 50% of direct sunlight for 2 hours. The proposal's communal open space achieves the required hours of direct sunlight as illustrated in **Figure 33**.

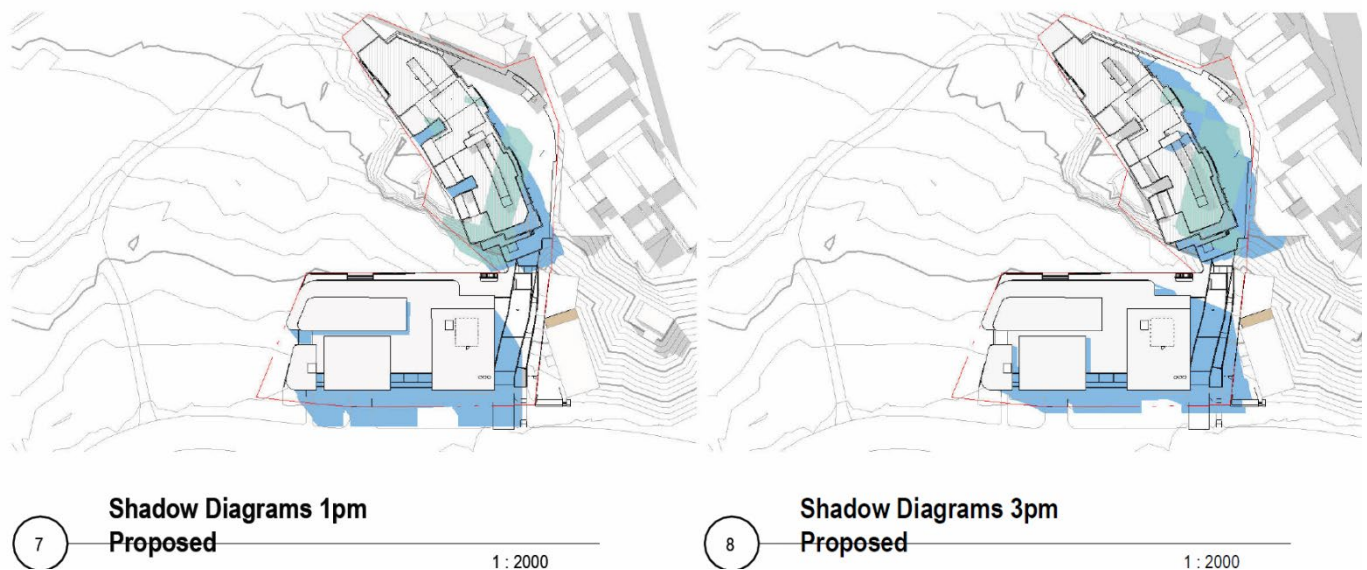


Figure 33 Shadow diagrams of communal space during mid-winter solstice

Source: Antoniades Architects

4.6 Arboricultural Impacts

An Arboricultural Impact Assessment (AIA) has been prepared by Rennie Bros. Tree Surgeons and is provided at **Appendix M**. The report assesses the likely impacts of the proposed works on the existing trees located on the site and makes recommendations around the removal, retention and/or pruning. The proposal necessitates the removal of 22 trees of the existing 45 trees. New tree planting at a rate of 3:1 is proposed. Revaluation of the trees proposed to be removed on the eastern boundary will be undertaken by the Arborist during construction excavation to determine if retention is possible pending soil conditions. Therefore, the total number of trees to be replaced is yet to be determined.

The AIA groups the trees as per their location on the site (refer to **Figure 34**).

- **Group 1** includes nine (9) trees. The proposed clubhouse works will require the removal of eight (8) of the trees which are of low to medium retention value. One of the trees (T8) (Sydney Blue Gum) has been identified as having a high retention value and is required to be removed. It has been recommended T8 is replaced with an advanced specimen of the same species in a location suitable for long-term growth.
- **Group 2** includes 16 trees. The proposed works will require the removal of T12 which is conflicted by the driveway entrance.
- **Group 3** includes five (5) trees. The proposed works to the accessway on the eastern boundary of the site and the clubhouse building will require the removal of four (4) trees which are of low to medium retention value. **Figure 34** below also shows the removal of T26 (medium retention value) in the event the recommendations provided cannot be met.
- **Group 4** includes eight (8) trees. The proposed works to both the ILUs and the clubhouse will require the removal of four (4) trees that are of low retention value. It has been recommended to also replace T38 (low retention value) with a better specimen in a location suitable for a long-term growth.
- **Group 5** includes seven (7) trees. The proposed works to the ILUs will require the removal of all trees. It has been suggested the trees be replaced with longer-lived indigenous or endemic species in locations suitable for long-term growth.



Figure 34 Tree retention and removal plan

Source: Stride Landscape Design

The AIA provides a series of tree protection recommendations prior to commencement of works, during works and post construction which are to be considered.

4.7 Noise Impacts

An Environmental Noise Assessment has been prepared by Day Design and is provided at **Appendix T**. The report includes an assessment of the potential noise and vibration impacts during the operation of the development, as well as noise intrusion from traffic. The report has been prepared with regards to the Willoughby Council DCP and the NSW Noise Policy for Industry standards. The noise sensitive receptors locations are shown in **Figure 35** below.



Figure 35 Location of noise sensitive receptors and noise loggers

Source: Day Design

The Assessment found that the proposal is capable of achieving compliance with the relevant noise criteria with the exception of one (1) minor exceedance expected for R1 (shown in **Figure 35**) related to the waste service vehicle accessing the Ground Level carpark of the clubhouse. The exceedance is 3dB (total 53Dba predicted noise level) and is considered acceptable as the service is expected to occur three times per week and the existing ambient L_{eq} noise level is 60dBA.

The Assessment provided a series of recommendations which are to be adopted in order to meet the acceptable noise level requirements of Council and the NSW Environment Protection Authority's Noise Policy for Industry and Liquour and Gaming:

- ILU driveway acoustic barrier of 2.4 metres above the finished level of the driveway;
- Background music is not to exceed an energy-average sound pressure level (L_{eq} , 15 minute) of 75 dBA when measured at 1 metre from the speakers within the dining area of the restaurant;
- The outdoor terrace is not to be used after 10pm;
- A detailed noise assessment should be made following the selection of mechanical plant prior to the issue of a Construction Certificate to ensure compliance with the noise criteria;

- Building façade construction recommendations (to reduce the level of noise transition from within the clubhouse):
 - External doors are to be kept closed when not in use. The door facing the Golf Course may remain open for access;
 - Roof structure is to have a minimum R_w 40. Specific construction detailing has been recommended;
 - External walls are to be constructed to have a minimum R_w 50; and
 - All glazing is to be a minimum 10.38 laminated glass (R_w 35).

4.8 Bushfire

As noted in **Section 4.2.3**, part of the site is mapped as Bushfire Prone Land, given that the Deepwater road frontage is within the Bush Fire Prone Vegetation Buffer (refer to **Figure 36** below). Part of the access way to the Independent Living Units is also within this buffer.

A Bushfire Services Letter has been prepared by BlackAsh and is provided at **Appendix O**. The Letter notes the proposed Independent Living Units are designated as a Special Fire Protection Purpose (SFPP) development which is to comply with the New South Wales Rural Fire Service (RFS) document *Planning for Bushfire Protection 2019*. The SFPP requirements note the building cannot receive greater than 10kW of radiant heat. The Letter notes an acceptable solution is an Asset Protection Zone, which requires suitable vegetation management and maintenance measures for minimising the risk of fire (illustrated in **Figure 37**). It is acknowledged the application will be referred to the RFS for concurrence.



Figure 36 Location of vegetation buffer and site outlined in orange

Source: BlackAsh



Figure 37 Proposed asset protection zone (100m)

Source: BlackAsh

4.9 Traffic and Parking

A Traffic and Parking Assessment Report (TPAR) has been prepared by CJP Consulting Engineers, which is provided at **Appendix L**. The TPAR assesses the traffic, parking, access, transport and servicing components of the proposal, and the associated impacts on the surrounding road network, parking and transport environment.

The site currently contains approximately 63 off-street car parking spaces (a notable amount of which are not currently marked) across three separate, outdoor at-grade parking areas, the main carpark fronting Deepwater Road, a carpark outside the existing clubhouse and a carpark outside the tennis courts. Vehicular access is provided via entry and exist driveways off Deepwater Road.

The following sections outline the proposed changes to the parking arrangements, as well as the traffic impacts resulting from the development.

Car Parking

Off-street parking is proposed for a total of 102 cars across two separate undercover parking areas for both the club and ILU residents. **Table 13** below outlines the parking provision spread across the car parks.

It is noted that a calculation of the required number of parking spaces to service the club component of the development has been calculated based on the carparking requirements of the existing club, as well as an assessment of other similar clubs in the area. Whilst the Willoughby DCP 2023 does not specify a rate for golf clubs or courses, a rate of 1 space per 12.2m² has been calculated and deemed appropriate by CJP.

Table 13 Car parking requirements and provision

Land Use	Key Parameters	SEPP/Club Car Parking Rates	Location	Parking Provision
Club	944m ²	1 space/12.2m ²	Club – ground level	76 spaces (including 4 accessible)
ILU Residents	17 dwellings (48 bedrooms)	0.5 spaces/bedroom	Basement & Lower Ground of ILU	24 spaces* (including 12 accessible)
ILU Visitors	No requirement	No requirement	Basement and Lower Ground of ILU	2 spaces (including 1 accessible)

**Note: As per Section 108 of the Housing SEPP, if at least 0.5 car spaces have been provided per bedroom, the consent authority is prevented from requiring more onerous standards. 0.5 car spaces per bedroom have been provided.*

Source: TPAR

A dedicated mini-van pick-up/drop-off bay is also proposed within the ILU – lower ground parking level, which is primarily intended to be used by the private Sunday bus service for resident outings and the like, however, it will also be available for taxi, Ubers etc.

Loading, Servicing and Emergency Vehicles

The proposed development will be serviced by a variety of commercial vehicles, including taxis, mini-buses, delivery vans and trucks, emergency service vehicles and other large vehicles, including an 8.8m long private contractor garbage medium rigid vehicle (MRV).

Two dedicated loading bays will be provided in the development, one for the ILU and another for the clubhouse. The ILU loading area will be provided on the lower ground level of the ILU at the top of the entry ramp from the street and adjacent to the waste room. It has been designed so it is capable of accommodating up to an 8.8m long MRV vehicle, and will include two loading spaces, one for larger vehicles and one more medium scale one, capable of accommodating a 12-seater minivan.

In relation to the clubhouse, a dedicated loading bay is proposed to be provided within the clubhouse parking area, which has been designed to accommodate a 6.4m long small rigid vehicle. This will be used by the club for food and beverage deliveries, golf shop deliveries and garbage collection. The clubhouse loading dock will incorporate one space for smaller rigid vehicles.

All traffic from each loading bay will be able to enter and exit the docks in a forward direction. Swept paths for both of the loading docks are provided at **Appendix L**.

Traffic Generation

CJP have undertaken traffic surveys to understand the existing traffic generated by the operation of the golf club, and to inform the likely future traffic generation as a result of the proposed development.

Table 14 outlines the estimated traffic generation rates for both the ILU and the clubhouse.

Table 14 Estimated traffic generation rates

Land Use	Trip Generation Rates		Trip Generation Estimates	
	Weekday AM Peak	Weekday PM Peak	Weekday AM Peak	Weekday PM Peak
ILUs	0.100/dwelling	0.201/dwelling	2 trips	4 trips
Clubhouse	2.46/100m ²	2.05/100m ²	23 trips	19 trips

Source: TPAR

Supporting the survey results, is noted that given the size of the new clubhouse will be slightly smaller as a result of the development, it therefore is likely less trips will be generated by the clubhouse compared to current traffic generation.

As a result of the traffic generation outlined in **Table 14**, the cumulative traffic flows along Deepwater Road (west) as a consequence of the development proposal are expected to remain well below the threshold of 200 vehicles per hour, which is the environmental goal for a local residential street set by TfNSW. Furthermore, the cumulative traffic flows along Deepwater Road (east) and Castle Cove Drive as a consequence of the development proposal are expected to hover around the 300 vehicles per hour threshold for a collector road's environmental goal, however, remain well below the threshold of 500 vehicles per hour which is the maximum for a collector road.

As a result of the traffic generation from the development, it is anticipated the development will not impact the level of operation of any surrounding intersections, which will all continue to operate at the highest level of service.

4.10 Operational Waste Management

An Operational Waste Management Plan has been prepared by Elephants Foot and is included at **Appendix R**. The Plan has detailed the waste and operational requirements for the proposed development in accordance with the relevant Australian Standards and Willoughby Council waste requirements. It is expected that number of collection frequencies required for these waste levels will be once weekly.

Elephants Foot have assessed the proposed development and calculated the following waste generation rates in accordance with the *NSROC Waste Management Guidelines 2018* for the independent living units.

Table 15 *Estimated waste and recycling volumes – Independent Living Units*

# Units	General Waste Generation Rate (L/unit/week)	Generated General Waste (L/week)	Recycling Generation Rate (L/unit/week)	Generated Recycling (L/week)	Garden Waste Generation Rate (L/unit/week)	Generated Garden Waste (L/week)
17	140	2380	120	2040	120	2040
TOTAL		2380		2040		2040
Bins and Collections	Bin Size (L)	240	Bin Size (L)	240	Bin Size (L)	240
	Bins/ Week	9.9	Bins/ Week	8.5	Bins/ Week	8.5
	Collections/Week	1	Collections/Week	1	Collections/Week	1
	Total Bins	10	Total Bins	9	Total Bins	9

In addition to the above, an assessment for the clubhouse component of the proposed development has been calculated based on the waste generation rates in accordance with the *NSW EPA's Better practice guide for resource recovery in residential developments 2019*. Calculations are based on generic figures and the assumption that the clubhouse will operate on a seven-day basis. It is expected that number of collection frequencies required for these waste levels will be three times weekly.

Table 16 *Estimated waste and recycling volumes – Clubhouse*

Tenancy	Type	NLA (m ²)	General Waste Generation Rates (L/100m ² /day)	Generated Garbage (L/week)	Garbage (L/week) Recycling Generation Rate (L/100m ² /day)	Generated Recycling (L/week)
Office	Offices	53	10	37.1	10	37.1
Kitchen	Restaurants	224	400	6272	280	4390.4
Dining/Lounge	Restaurants	214	400	5992	280	4194.4
Shop	Shops < 100m ² floor area	91	50	318.5	25	159.25

Tenancy	Type	NLA (m ²)	General Waste Generation Rates (L/100m ² /day)	Generated Garbage (L/week)	Garbage (L/week) Recycling Generation Rate (L/100m ² /day)	Generated Recycling (L/week)
TOTAL		582		12619.6		8781.15
Equipment and Collections	Bin Size (L)			1100	Bin Size (L)	1100
	Bins Per Week			12	Bins Per Week	8
	Collections/Week			3	Collections/Week	3
	Total Bins Required			4	Total Bins Required	3

The proposed bin capacity and numbers is considered appropriate to accommodate the expected waste generation. The proponents contracted waste collection specialists will be contracted to remove all general and recyclable waste from both the ILUs and clubhouse. The maintenance staff of Castle Cove Golf Club will be required to maintain and manage the bin holding / collection area whereas responsibility for the ILUs will remain with both the residents and building manager. Further discussion on the waste management arrangements is provided in **Appendix R**.

4.11 Crime Prevention Through Environmental Design

A separate Crime Prevention Through Environmental Design (CPTED) assessment report has not been undertaken for this development. However, with the incorporation of the following recommendations (in line with the principles of CPTED), the development can enhance safety and security provisions on site. These recommendations are listed below.

Surveillance:

- Ensure natural surveillance is maximised in communal living areas and communal open space by keeping circulation spaces free from obstructions or visual clutter.
- Ensure CCTV technical supervision is appropriately monitored on a regular basis and surveys all external access points, the pedestrian pathway, lifts and common areas.
- Ensure natural surveillance is maintained in the basement car park through parallel spacing of car parking and provision of adequate lighting that is able to permit facial recognition and facilitates visibility into a vehicle.

Lighting and Technical Supervision:

- Ensure lighting throughout communal open spaces, public domain improvements along Herring Road and the basement car parks are adequate and meets the Australian Lighting Standard AS/NZ 1158 and AS/NZ 4282 for public streets, car parks and pedestrian areas.

Access Control:

- Ensure pedestrian and vehicle access to the undercover carpark is restricted from the public.
- Ensure access via the clubhouse is monitored by staffed personnel.
- Consider swipe / electronic access provisions to all private areas, including resident basement car parking and lift to access the ILUs.

Territorial Reinforcement:

- Ensure territorial enforcement is maintained and clearly defines ownership and private property, especially through the provision of fencing, secure pedestrian accessways and boom gate access to car parking areas. It is recommended that landscaping elements be utilised to convey boundary lines without over-fortifying the place.

Environmental Maintenance:

- Ensure environmental maintenance is consistent and thorough, and that the management authority of communal areas is clearly understood by users.

- Ensure environmental maintenance provisions include fast acting procedures such as a rapid removal policy for graffiti or any vandalism that may occur to the property.

4.12 Other Matters for Consideration

Matter	Comment	Appendix
Biodiversity	An assessment of the proposal's consistency with the Biodiversity Conservation Act 2016 and the Environment Protection & Biodiversity Conservation Act 1999 has been undertaken as part of the Flora and Fauna Impact Assessment prepared by Gunninah. It was concluded there are no significant or particularly relevant ecological or biodiversity features or values within the site.	Appendix P
Access	An Access Assessment Report has been prepared by Jensen Hughes and provides an assessment of the proposal against the Deemed-to-Satisfy provisions of the Building Code of Australia (BCA) 2019. The Report also outlines the identified BCA compliance issues that require further information and consideration and/or assessment as Performance Solutions. The Report concludes the proposal complies or is capable of complying with the relevant BCA standards.	Appendix K
Geotechnical	A Geotechnical Investigation Report has been prepared by Douglas and Partners. This assessment was carried out to provide information on the subsurface conditions at the site for design and planning purposes of the proposed development and included the drilling of 10 rock cored boreholes and laboratory testing of selected samples. The detailed results of the assessment can be found within the Report.	Appendix N
BASIX/Section J/NatHERS	A NatHERS, BASIX Certificate and Section J Report has been prepared to demonstrate the proposal's commitment to sustainability and energy efficiency.	Appendix I
Flood	A Flooding Assessment has been prepared by GRC Hydro which includes an overland flow assessment of the flood affectation of the site and how the proposal demonstrates compliance with Council's controls. The assessment found that there is a small volume of overland flow potentially intercepted by the proposal and will divert to Deepwater Road and Gold Course (downstream of the development) without any adverse off-site flood levels impacts. As such, a floor impact assessment is not required.	Appendix S
Contamination	A Preliminary In-Situ Waste Classification has been prepared and provides detail on the results of a waste classification on in-situ fill and natural soils located on the site. The assessment concluded through a series of investigations, including laboratory testing from 10 geotechnical boreholes taken across the site, that there were no observed sub-surface soils that met contaminant thresholds.	Appendix X
Utility Services	Site Investigation Requests were made to Ausgrid and Sydney Water which have outlined the required electricity, water and sewage requirements. The recommendations from Ausgrid related to the augmentation of the electricity network with the installation of a kiosk-type substation to facilitate the required power usage. This has been indicatively shown in the Architectural Plans at Appendix A . Sydney Water identified that there is currently both a 250mm CICL water main and a 150mm SGW sewer main that will be required to be altered to accommodate the proposed development. The proposed development is capable of accommodating this request.	Appendix Y

4.13 Social and Economic Impacts in the locality

The proposed development will provide a renewed community asset in addition to providing additional seniors housing to meet the needs of the aging population of Willoughby. Specifically, the proposal will:

- Reintroduce Castle Cove Country Club as a community-focused hub where locals can gather socially in community function rooms, have a meal or drink with family and friends, or spend time before or after a game of golf/tennis;
- Provide highly needed self-contained seniors housing in a location close to services and facilities that complement the character of the local area, in terms of its design, scale, and the integration of landscaping and green space;
- Increase the provision of connections to the community for seniors by providing onsite communal open space that enables social interaction among residents whilst ensuring privacy and individual amenities;
- Secure the longevity of the Club and ensure the golf course remains a well-maintained, high quality green space for the local area;
- Helps to meet the strategic need for additional housing diversity including the provision of seniors housing in an accessible location that reinforces the principle of aging in place; and
- Proposes a unique land use mix which is complementary to each other, which in turn will generate additional employment opportunities during both the construction and operational stages of the development.

4.14 Development Contributions

Local Infrastructure Contributions Plan

The proposed development will be subject to both Section 7.11 and 7.12 contributions under the Willoughby Local Infrastructure Contributions Plan 2019 pending the approval of subdivision. If subdivision is approved, it is expected that the ILU component of the development will have Section 7.11 contribution rates applied to residential units as the development will result in additional dwellings. Additionally, Section 7.12 levy rates which apply to non-residential development would be deemed applicable to the clubhouse component.

Housing and Productivity Contribution

As of the October 2023, new residential development within Greater Sydney region that intensifies land-use where new dwellings are created, such as houses, apartments, terraces and dual occupancies is subject to the Housing and Productivity Contribution (HPC). This contribution replaces the previous Special Infrastructure Contribution (SIC) in the NSW planning legislation. New residential development, in the form of residential flat buildings and units (including ILUs), is subject to a contribution of \$10,000 per dwelling and will be subject to any applicable indexation and discounts (up to June 2025). Additionally, it is acknowledged the clubhouse use is a form of commercial development under the HPC and requires a contribution of \$30 per m² and will be subject to any applicable indexation and discounts (up to June 2025).

4.15 Suitability of the Site for the Development

Having regard to the characteristics of the site and its location, the proposed development is suitable for the site as:

- The site can appropriately accommodate the proposed development while balancing environmental and design consideration and preserving the amenity of neighbouring properties;
- It will provide for a renewed clubhouse facility that is an integral part of the existing golf course community, providing its members with a high level of amenity and complimentary uses to the golf sport;
- It will provide built forms that are sympathetic to the site's change in level and a connection from the golf clubhouse to the golf course grounds;
- It will cater for the ageing population and provide capacity for existing residents in the local community to age in place and provide an increased supply and diversity of housing that meets the needs of seniors in Castle Cove and the Willoughby LGA more widely; and
- The architectural design will deliver a high quality and modern seniors housing development, which will support a safe and secured seniors living environment.

4.16 Public Interest

In accordance with Section 4.15(1)(e) of the EP&A Act, the proposed development is considered to be in the public interest as it will:

- Enable the redevelopment of the existing clubhouse which currently exhibits clear signs of aging and portions unusable due to its poor condition into a multi-functional space that will provide direct access to the Castle Cove Golf Course;
- Provide for seniors housing supply in the form of ILUs that will accommodate the ageing population and provide for an alternate housing typology within the Castle Cove area;
- Provide for ILUs with a high standard of amenity and which benefit from expansive views of the neighbouring Castle Cove Golf Course;
- Provide for a built form that is integrated within its landscape setting and will improve current views from the Castle Cove Golf Course;
- Enable a built form along Deepwater Road that is appropriately articulated and responds to the surrounding residential built form; and
- Provide for a colocation of uses that will be mutually beneficial.

5.0 Conclusion

The proposed development is for a new clubhouse and Independent Living Units at 68-74 Deepwater Road, Castle Cove. Specifically, this Development Application seeks consent for the following:

- Demolition of the existing golf clubhouse and car park;
- Subdivision of current Lot 1 in DP 610360 and Lot 510 in DP200636 into proposed lots 1 and 2 (inclusive of easements);
- Construction of a two (2) storey new golf clubhouse, comprising:
 - Ground floor carpark comprising 76 spaces and one (1) loading zone; and
 - First floor comprising a foyer; dining lounge; kitchen and service area; pro-golf shop; club administration area and meeting room; male/female changing rooms and toilet facilities; terrace dining and golf buggy and cart storage cages.
- Construction of a part two (2) and three (3) storey building for Independent Living Units (ILUs) comprising:
 - Three (3) two bedroom and 14 three bedroom units; and
 - Two (2) level basement car parking containing 26 spaces, one (1) bus zone and one (1) loading zone.
- Associated landscaping.

This SEE has provided a detailed assessment of the proposal against the relevant matters under section 4.15(1) of the EP&A Act. The application is recommended for approval as:

- The proposal will facilitate the redevelopment of the site to include the purpose of seniors housing, which will deliver important social and economic benefits to the community by contributing to housing diversity for the increasingly elderly population;
- The proposal has been designed in a way to responds specifically to the site's undulating topography and unique allotment shape, with the placement of building bulk and floorspace to minimise amenity impacts to the surrounding area;
- The redevelopment of the clubhouse will help secure its longevity and will also provide a greatly improved offering to members and the wider Castle Cove community. Renewal of the clubhouse will also ensure the golf course remains a well-maintained, high quality green space for the local area;
- The proposed contemporary and modern built form and urban design will significantly contribute to the streetscape of Deepwater Road and surrounding developments;
- The proposed development provides a high quality architectural design that provides a contextual response to the immediate area;
- The proposed development is consistent with the aims and objectives of the relevant strategic planning framework, particularly the North District Plan and the Willoughby City Local Strategic Planning Statement by increasing the supply of seniors housing commensurate to forecasted demand within the LGA in addition to providing upgrades to greatly valued community asset and;
- The assessment of the proposal has demonstrated that the development will not result in any environmental impacts that cannot be appropriately managed and consistent with the relevant planning controls for the site.

In light of the merits of the proposal and in the absence of any significant environmental, social or economic impacts, we have no hesitation in recommending that the application be approved subject to standard conditions of consent.