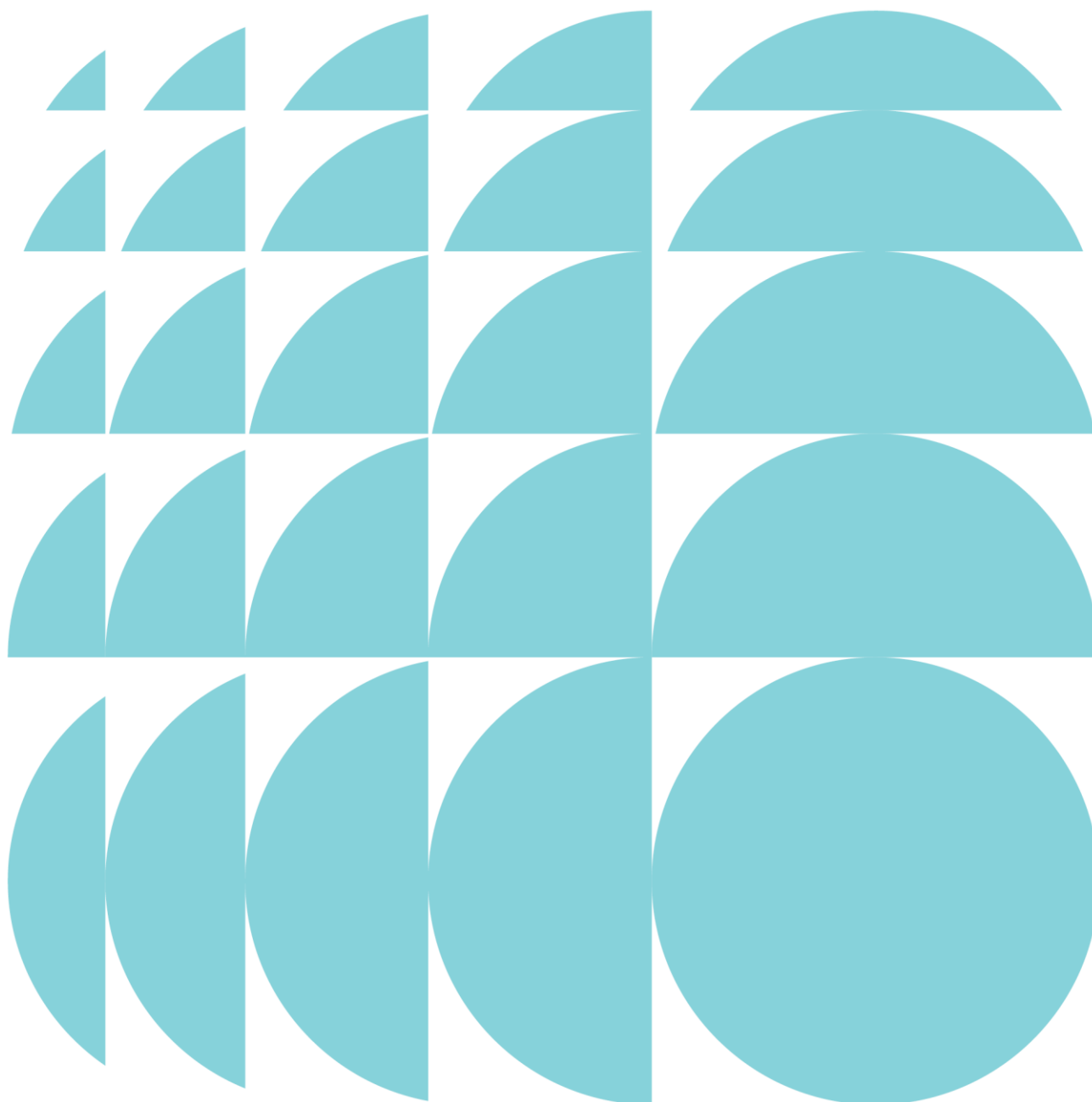


## Statement of Environmental Effects

2 Greenwich Road, Greenwich  
Seniors Independent Living Units

Submitted to Lane Cove Council  
On behalf of Alceon Group No 55 Pty Ltd ATF  
Greenwich Road Trust

1 May 2020 | 2191031



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1 MAY 2020

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**N** BCA Statement

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**O** Access Report

*BCA Logic*

**P** Construction Traffic Management Plan

*Stevens Construction*

**Q** Right of Carriageway Correspondence

*Veris Australia*

**R** Infrastructure Services Statement

*Lakiss and Associates Consulting Engineers*

## 1.0 Introduction

This Statement of Environmental Effects (SEE) is submitted to Lane Cove Council in support of a Development Application (DA) for a high quality seniors housing development at 2 Greenwich Road, Greenwich, the site of the former Northside Clinic.

The DA seeks approval for:

- Demolition and site preparation works;
- Construction of an 8 storey seniors housing development, comprising:
  - 40 independent living units (ILUs);
  - 739m<sup>2</sup> of commercial floor space and communal facilities across Lower Ground and Ground Level;
  - Rooftop garden area including swimming pool, open kitchen and dining area;
- Construction of 3 basement levels for car parking accommodating 76 car spaces and loading zone;
- Landscaping works; and
- Associated site infrastructure works.

This SEE has been prepared by Ethos Urban on behalf of Alceon Group No 55 Pty Ltd ATF Greenwich Road Trust (Alceon Group), and is based on the Architectural Plans provided by Marchese Partners (see **Appendix A**) and other supporting technical information appended to the report (see Table of Contents).

This report 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. The application is recommended for approval as the proposal:

- is largely consistent with the aims and objectives of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (Seniors SEPP) and other relevant State Environmental Planning Policies as well as the Lane Cove Local Environmental Plan 2009 (LCLEP 2009) and Lane Cove Development Control Plan 2010 (LCDCP 2010);
- will increase supply of seniors housing commensurate to forecasted demand within the LGA and improve the quality of seniors housing stock available within the LGA;
- is carefully designed to provide a contextual response to the site setting and minimise bulk and scale impacts to adjoining properties;
- provides a quality architectural design that will contribute to a safe and active environment;
- includes supporting technical studies which confirm that the environmental impacts associated with the proposal are generally positive and will not give rise to any adverse impacts; and
- is suitable for the site and is in the public interest.

## 2.0 Background

### 2.1 Ramsay Health Care's 2017 Planning Proposal

A Planning Proposal was lodged by Ramsay Health Care with Council on 11 April 2017 which sought to amend the LCLEP 2009, to incorporate additional permitted use of shop top housing in the B3 Commercial Core zone and increase the maximum building height from 25m to 33m. The proponent lodged a rezoning review on 18 August 2017 as the proposal had not been determined within 90 days of lodgement.

Subsequently, the Sydney North Planning Panel (SNPP) considered the proposal on 25 October 2017. Most Panel members adopted the view that the proposal should be submitted for Gateway assessment subject to the zoning, density and height being consistent with the outcomes of the strategic investigation being undertaken by the Department for St Leonards and Crows Nest prior to exhibition of the Planning Proposal.

On 6 September 2018, the Planning Proposal received Gateway Determination for shop top housing as an additional permitted use and an increase to the maximum building height. The Gateway was subject to a number of conditions, including:

*'prior to finalisation, the planning proposal is to be amended to demonstrate consistency with the final strategic planning framework for the St Leonards and Crows Nest Station Precinct'.*

On 16 October 2018, the Proponent lodged a Gateway Determination review application on the basis that the determination had been made that imposed requirements that made variations to the proposal.

The draft 2036 Plan was then released in late 2018. The draft 2036 Plan does not recommend any land-use changes for the site, creating a conflict with the intent of the Planning Proposal to allow shoptop housing.

In 2019 the Gateway Review continued to progress, and involved the Department requesting the Independent Planning Commission to review the proposal and prepare advice concerning its merits. The Commission retained the conditions as imposed in the original Gateway but amended them to reflect the draft 2036 Plan may be subject to further amendment.

The 2036 Plan is yet to be finalised, however, as the future owners of the site, Alceon Group are now seeking to develop seniors housing, which are permissible pursuant to the Seniors SEPP, the further progress of the Planning Proposal is no longer required or relevant to the DA.

### 2.2 Pre-DA Lodgement Meeting

A pre-DA lodgement meeting was held with Lane Cove Council on 28 January 2020 to discuss the proposed seniors development of the site. The key issues raised in the pre-DA meeting and responses are provided in **Table 1**.

**Table 1 Summary of key issues raised and responses**

Council concern	Response
<p><i>Strategic Planning</i></p> <p>While it appears that the SEPP is facultative, it enables the making of an application, a full assessment of the merits in accordance with Section 4.15(1) of the Environmental Planning and Assessment Act, 1979, is still required. In the circumstances of this case concern is raised that the proposal is incompatible with the objectives of the B3 Commercial Core Zone and the Draft St Leonards and Crows Nest 2036 Plan in relation to the maintenance/enhancement of employment lands.</p>	<p>The purpose of the SEPP is to "increase the supply and diversity of residences that meet the needs of seniors or people with a disability," and it seeks to achieve this by "setting aside local planning controls that would prevent the development of housing for seniors or people with a disability that meets the development criteria and standards specified in this Policy".</p> <p>In setting aside local planning controls that would otherwise prevent seniors housing, the SEPP has intrinsically been drafted to result in situations where the development does not achieve the underlying objectives of the zone in which it is proposed.</p> <p>Notwithstanding this, the proposed DA scheme incorporates a greater quantum of commercial and non-residential uses at the ground level of the building in response to Council's feedback.</p>



Council concern	Response
	Further discussion on the proposal's compatibility with the relevant strategic plans and policies is provided in <b>Section 5.1.1</b> .
<p><i>Site Area</i> A detailed understanding of whether Lot 1 DP 66215 can be included in the site area for the purposes of calculating Floor Space Ratio is to be provided including addressing both Clause 4.5(3), 4.5(4(a)), 4.5(6) and 4.5(9).</p>	<p>Veris Australia has assessed the Right of Carriageway on the northern site boundary (refer to <b>Appendix Q</b>). Veris Australia confirm that Lot 1 in DP 66215 forms part of 2 Greenwich Road and is owned by Phiroan Pty Ltd. Further discussion is provided below.</p> <p>We note that the proposed FSR complies with the LCLEP 2009.</p>
<p><i>Right of Carriageway</i> The proposal seeks to modify area (A) including driveway realignment and basement excavation. A review of the Dealing (P273085) could not find details of the limitation in height through stratum levels. Written consent from the benefitting allotment is required for any works within the right of carriageway. Further detail is required as to how Right of Carriageway (B) within the adjoining allotment will be restored at the completion of works as the submitted plans do not detail how this will be dealt with. Owners consent of No. 154 Pacific Highway will be required for these works.</p>	See Section 2.3 for further details on Right of Carriageway. It is noted that Owner's consent of 154 Pacific Highway is not required.
<p><i>Substation</i> Consultation with the energy provider regarding proximity to the electricity substation is to be undertaken and the design suitably informed by any restrictions prior to lodgement.</p>	The proposal will utilise the existing substation, to supply the new seniors living development. The existing substation has enough capacity to cater for the development's requirements. An application will be submitted to Ausgrid during the next phase of the design.
<p><i>Clause 19 SEPP Seniors</i> The entire ground floor is to be made commercial in accordance with Clause 19 of SEPP Seniors. The amount of commercial floor area provided in the concept plans is tokenistic and not in keeping with the intent of Clause 19.</p>	Whilst it is noted that Clause 19 only requires non-residential uses where the building has a frontage to roads, as the intent of the clause is to ensure frontages in a commercial area are activated, the proposal has been amended to remove all residential apartments from the ground level and provide a range of non residential uses at the ground floor in response to Council's request. These uses will increase activation along Greenwich Road, particularly from that which currently exists.
<p><i>Commercial floor to ceiling height</i> The ground floor ceiling height is to be a minimum 3.3m in accordance with the Apartment Design Guide (ADG).</p>	The floor to floor height of the Ground Level has been amended to 3.5m to achieve a floor to ceiling height of 3.3m as requested.
<p><i>Building Height</i> The proposed building height is to be amended to comply with the provisions of Lane Cove Local Environmental Plan 2009. A building height variation at a zone and development standard transition point is not considered supportable.</p>	Where the height limit in the LCLEP is inconsistent with the SL Living SEPP, the Seniors SEPP prevails. Notwithstanding this the proposal has had regard to the height limit with the majority of the building being located beneath it. The additional height does not adversely impact on neighbours in terms of overshadowing and is less than the 33m height limit as proposed in the 2018 Planning Proposal for the site that received a Gateway Determination. Further discussion is provided in <b>Section 5.4.1</b> .
<p><i>Access</i> A detailed access report is to be provided accompanying any DA demonstrating compliance with the access requirements of the SEPP (both internally and external to the site).</p>	An Access Report has been prepared by BCA Logic and is included at <b>Appendix O</b> . The report confirms that the design documentation have been assessed against the applicable provisions relating to accessibility and complies or is capable of complying with the relevant standards.
<p><i>Front Setback</i> The front setback will have to have regard to its context and the setback of the adjoining commercial building (154 Pacific Highway) and adjoining residential flat building (4 Greenwich Road). The provision of a 5m front setback would result in a building situated well forward of the established front building line. It is noted the setback provisions in D.1 of the DCP are a minimum and not a maximum, and the over-riding objective of reducing the impact of scale is to be achieved. (In this way the concepts submitted with the planning proposal were more appropriate in terms of front setbacks achieved).</p>	The front setback has been amended to range from between 7.5m down to the DCP requirement of 5m setback to Greenwich Road. While Council have noted that this setback would result in the building situated forward from the front building line, through careful articulation of the architectural design including the adoption of a pinched form running through the centre and curved lines along balconies, this assists in reducing any perceived bulk and scale from the public domain. Further, the proposal incorporates a plaza and dedicated pedestrian and vehicular entry points delineated by substantial

Council concern	Response
	landscaping in the front setback which helps soften the scale of the development.
<p><i>Solar Access</i> The solar access outcome to adjoining properties between 9am and 3pm mid-winter must be closely considered and where an existing building receives less than the required solar access, the proposal is not permitted to worsen that situation.</p>	The shadows cast by the proposal are generally in line with overshadowing resultant from a compliant commercial building envelope under the LCLEP 2009 controls. This is further discussed in <b>Section 5.5.1</b> .
<p><i>Tree Management</i> The applicant will need to provide a detailed Arborist Report applying retention values to all of the trees located within 10 metres of the proposal. The report is to be an Impact Assessment that includes recommendations to mitigate impacts and clearly specifies what is intended to be removed and retained. It is noted the Survey Plan appears to be incomplete with regard to trees shown.</p>	An Arboricultural Impact Assessment has been prepared by Trace Environmental and is included at <b>Appendix F</b> . The report includes an assessment of trees required for removal as well as those within proximity to the development and the appropriate tree protection zones to be implemented.
<p><i>Landscaping</i> The design of the development must be informed by an Arborist Report. Landscape architectural plans are to include dense at the zone transition interfaces, suitable sections through the ground, basement and any rooftop on-structure planting, deep soil percentages shown on the landscape plans, and preparation of plans in accordance with Council's Landscape Checklist.</p>	An Arboricultural Impact Assessment has been prepared by Trace Environmental and is included at <b>Appendix F</b> .  Distinctive Living Design have prepared Landscape Plans at <b>Appendix D</b> .
<p><i>Waste Management</i> Operational Waste Management Plan will be required (in addition to WMP for demolition/construction phase). The OWMP will be required to detail the chute/carousel system with 1 x blue and yellow 240L bin made available on each level. Appears to be insufficient room for bin storage on the basement plan (plans should show bins to demonstrate adequate size), in addition 30m<sup>2</sup> bulk store is to be provided, 1.7m door provided to both bin rooms. The proposal is to demonstrate compliance with Part Q of Lane Cove Development Control Plan 2010.</p>	An Operational Waste Management Plan has been prepared by Elephants Foot and is included at <b>Appendix I</b> . The proposed waste management is compliant with Part Q of Lane Cove Development Control Plan 2010.
<p><i>Environmental Health</i> A contamination report addressing SEPP 55 prepared in accordance with EPA Guidelines is to accompany the application.</p>	A Preliminary Site Investigation has been prepared by Trace Environmental and is included at <b>Appendix K</b> . Trace Environmental have prepared a Preliminary Site Investigation (PSI). The PSI finds that no historical contaminating activities have been identified at the site which may have resulted in potential site contamination, except for possibly imported fill of unknown sources used as part of the construction of the current building and landscaping areas. Based on these observations, Trace Environmental consider that the site is able to be made suitable for the proposed development subject to the recommendations outlined in <b>Section 5.9</b> .
<p><i>Parking and Traffic</i> A comprehensive traffic and parking report is to be provided including detailed demonstration of compliance with Australian Standards (swept paths, dimensioned spaces, aisle widths, driveway cross-sections), an assessment against the parking provisions of SEPP Seniors (and any other provisions such as an ambulance bay if required) and consideration of traffic impacts, queuing and sightlines.</p>	A Traffic and Parking Assessment has been prepared by Varga Traffic Planning, addressing traffic generation and parking in accordance with the Seniors SEPP (refer to <b>Appendix E</b> ).
<p><i>Engineering</i> Drainage to Anglo Road will be required through a drainage easement with new pit and pipe to installed on Anglo Road. The basement is to drain via pump-out to the On-site Detention System and a Gross Pollutant Trap is required in</p>	As discussed in the Civil Engineering Report prepared by BG&E at <b>Appendix H</b> , the OSD tank flows will be piped to a new pit and pipe network within the proposed drainage easement before discharging to Anglo Road.

Council concern	Response
the design. The design is to comply with Part O of Lane Cove Development Control Plan 2010.	

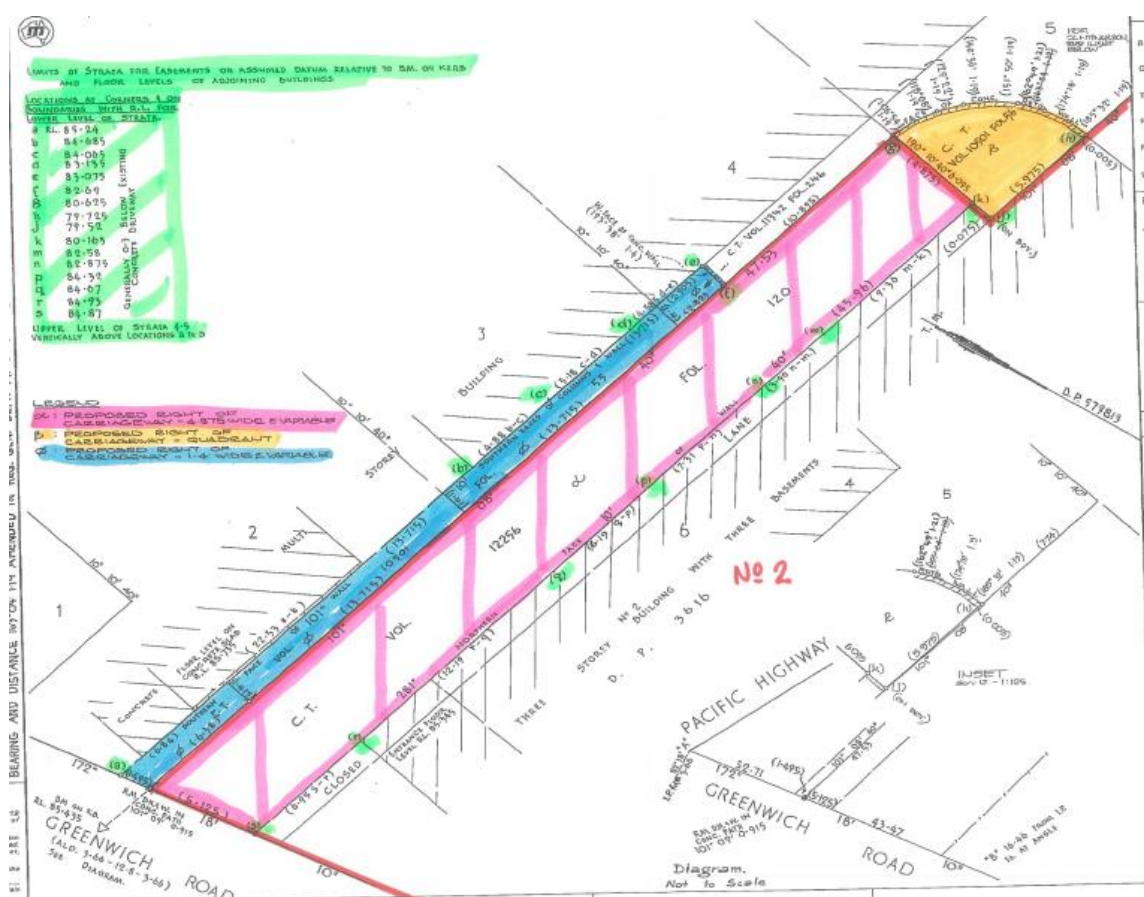
## 2.3 Right of Carriageway

A Right of Carriageway burdens Lot 1 in DP 662215 and has been assessed by Veris Australia (refer to **Appendix Q**). It forms part of the land at 2 Greenwich Road and is owned by Phiroan Pty Ltd. This Right of Carriageway benefits the adjoining land to the north being Lots 3-5 (inclusive) in DP 3616 and Lots 1 and 2 in DP 324870 and is owned by the NSW Farmers Association. Accordingly, the land to the north only has the Right to Use. This Right of Carriageway is shown hatched pink at **Figure 1** below.

Further, the Right of Carriageway (Quadrant) shown orange in **Figure 1**, burdens Lot 5 in DP 3616 which is the adjoining property to the east and is owned by the NSW Farmers Association. This quadrant abuts the north and east of 2 Greenwich Road and it is identified by Veris Australia as benefitting the site.

Finally, the Right of Carriageway (1.4 wide and variable) shown blue in **Figure 1** burdens Lot 3 and 4 in DP 3616 and Lot 2 in DP 324870 which is the adjoining property to the north and is owned by the NSW Farmers Association. This Right of Carriageway benefits Lot 1 in DP 662215 and Lot 2 in DP 566041 which are owned by Phiroan Pty Ltd. The property located on Lot 4 fronting Anglo Road does not benefit any adjoining easements.

The proposed development has been designed to be accommodated entirely within the land owned by Phiroan Pty Ltd that forms part of 2 Greenwich Road, and does not require the land owners consent of 148 Pacific Highway, Greenwich.



**Figure 1** Survey Plan identifying Right of Carriageway

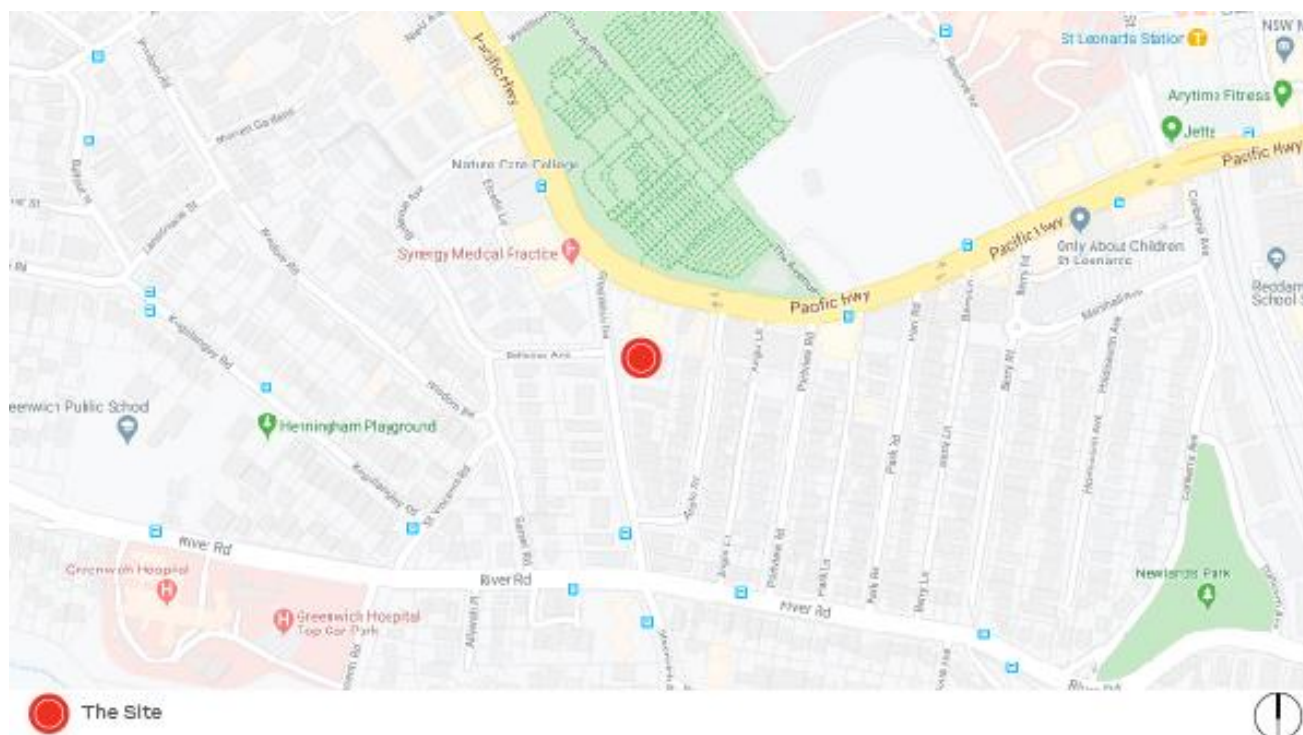
Source: Veris Australia

## 3.0 Site Analysis

### 3.1 Site Location and Context

The site is located at 2 Greenwich Road, Greenwich within the Lane Cove local government area (LGA). The site is located approximately 600m southwest of the St Leonards Railway Station and approximately 400m south of the Royal North Shore Hospital. The site adjoins a commercial building immediately to the north, a low density detached dwellings to the east, a three storey residential flat building to the south and has its primary frontage to Greenwich Road to the west.

The sites locational context is shown at **Figure 2** below.



**Figure 2** Site locational context

Source: Ethos Urban

### 3.2 Site Description

The site is legally described as Lot 1 in DP 662215 and Lot 2 in DP 566041. The site's area is 2,140m<sup>2</sup> and is generally regular in shape. The site is owned by Phiroan Pty Ltd.

The site has one street frontage to Greenwich Road (34m) and has a steep slope with a 5m fall to the rear eastern boundary and 3m fall to the southern boundary. The driveway along the northern site boundary has a steep slope with a fall to the east to provide access to the basement car park level.

A survey plan is located at **Appendix B** and an aerial photo of the site is shown at **Figure 3**.





**Figure 3 Site aerial**

Source: Nearmap / Ethos Urban

### 3.3 Existing Development

The site comprises a five storey concrete building which was the former Northside Clinic Private Hospital and is currently an unoccupied following the relocation of the Clinic to a new purpose built facility in Artarmon. The main pedestrian entrance to the site is from the west via Greenwich Road and vehicular access is provided by a concrete paved driveway along the northern boundary, providing a steep entrance to the basement car park.

The existing development is shown in **Figure 4** to **Figure 7**.



**Figure 4 Existing building– viewed from Greenwich Road**

Source: Nearmap



**Figure 5 Existing building and entry to carpark**

Source: Nearmap



**Figure 6 Existing carpark entry looking east**

Source: Ethos Urban



**Figure 7 Existing driveway looking west**

Source: Ethos Urban

### 3.3.1 Access and Loading

Access to basement carparking and loading on the site is provided via a driveway connected to a single ingress and egress point on Greenwich Road, located adjacent to the northern boundary. The driveway is shared with 145 Pacific Highway and contains easements for access (see Section 3). Individual pedestrian access is provided from the site's entry point, delineated by paving and vegetation, directly off Greenwich Road just south of the driveway.

### 3.3.2 Topography

The site has a general slope toward the south, however the existing development contains a variety of terraced levels including a paved courtyard in the southern portion and a driveway along the northern site boundary which slopes to the east.

### 3.3.3 Vegetation

The site is mostly paved concrete, with some landscaped areas in the western and southern portions. Overgrown gardens and mix of trees of varying health and size are located on the southern and eastern site boundaries.

### 3.3.4 Contamination

A Preliminary Site Investigation has been prepared by Trace Environmental and is included at **Appendix K**. The investigation identifies that no historical potentially contaminating activities have been identified at the site which may have resulted in site contamination, except for possible imported fill of unknown sources used as part of the construction of the existing building. Based on these observations, it is considered that the site can be made suitable for the proposed development. Further discussion is provided at **Appendix K**.

### 3.3.5 Heritage

The site is not heritage listed, nor is it located in a heritage conservation area.

### 3.3.6 Bushfire

The site is not identified as bushfire prone land.



### 3.4 Surrounding Development

The following development surrounds the site:

- **North:** A large commercial development, known as 154 Pacific Highway is located to the immediate north. The Pacific Highway, Gore Hill Cemetery and Park are located further north;
- **East:** To the immediate east is the low density residential development fronting Anglo Road and other commercial development located along the Pacific Highway. 4 Anglo Road (see **Figure 11**), which is immediately adjacent to the site is also owned by Phiroan Pty Ltd. Further east is St Leonards Train Station;
- **South:** To the south is residential development and Greenwich Hospital towards the south west; and
- **West:** To the west is residential development and Greenwich Public School beyond.

The surrounding development is shown in **Figure 8** to **Figure 11** below.



**Figure 8 Existing commercial building located at 154 Pacific Highway (immediately north of the site)**

Source: Nearmap



**Figure 9 Existing residential development to the immediate south of the site**

Source: Nearmap



**Figure 10 Car park entry from Right of Carriageway on northern boundary**

Source: Ethos Urban



**Figure 11 Existing residential development located at the rear of the site on Anglo Road. 4 Anglo Road (shown in the foreground) is owned by Phiroan Pty Ltd.**

Source: Ethos Urban

## 4.0 Description of Proposed Development

The proposed development seeks approval for the following:

- Demolition and site preparation works;
- Construction of an 8 storey seniors housing development, comprising:
  - 40 independent living units (ILUs);
  - 739m<sup>2</sup> of commercial floor space and communal facilities across Lower Ground and Ground Level;
  - Rooftop garden area including swimming pool, open kitchen and dining area;
- Construction of 3 basement levels for car parking accommodating 76 car spaces and loading zone;
- Landscaping works; and
- Associated site infrastructure works.

Architectural drawings illustrating the proposed development are included at **Appendix A**. A CGI of the proposed development is shown at **Figure 12**.



**Figure 12** CGI of the proposed development

Source: *Marchese Partners*



## 4.1 Numerical Overview

The key numeric development information is summarised in **Table 2**.

**Table 2 Key development information**

Component	Proposal
Site area	2,140m <sup>2</sup>
GFA*	6413.9m <sup>2</sup>
FSR*	3:1
Maximum Height*	25.3m (RL108.86)
Dwellings	40 dwellings
Car spaces	76 car spaces
Landscaped Area	1,778m <sup>2</sup>
Deep Soil Area*	15% (320m <sup>2</sup> )*

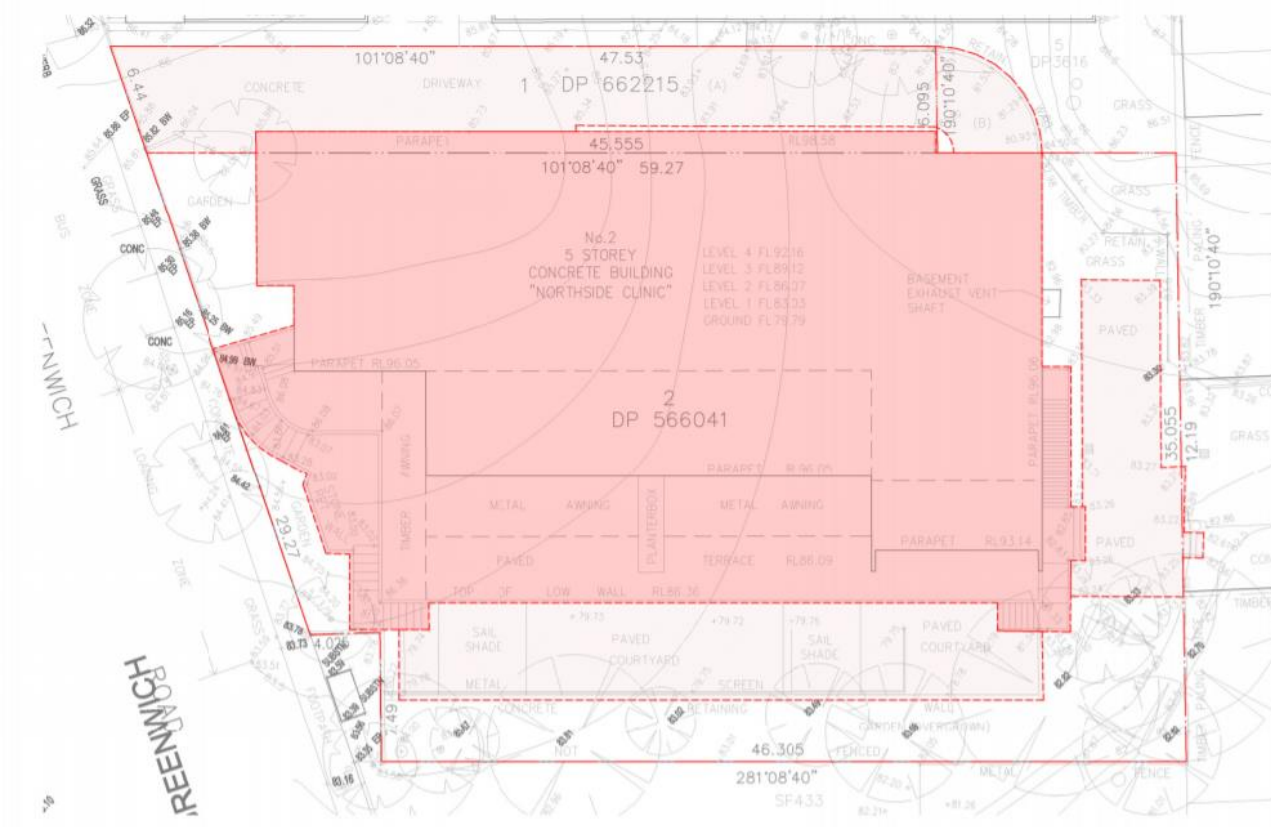
\* calculated in accordance with the SL SEPP

## 4.2 Demolition and Site Preparation

The proposed demolition and site preparation involves the removal of the existing building on site, including all internal fittings, structures and existing foundations.

In addition, 13 trees will require removal as part of the application in accordance with the Arboricultural Impact Assessment prepared by Horticultural Management Services and included at **Appendix F**.

The proposed demolition plan is shown at **Figure 13** below.



**Figure 13 Proposed demolition plan**

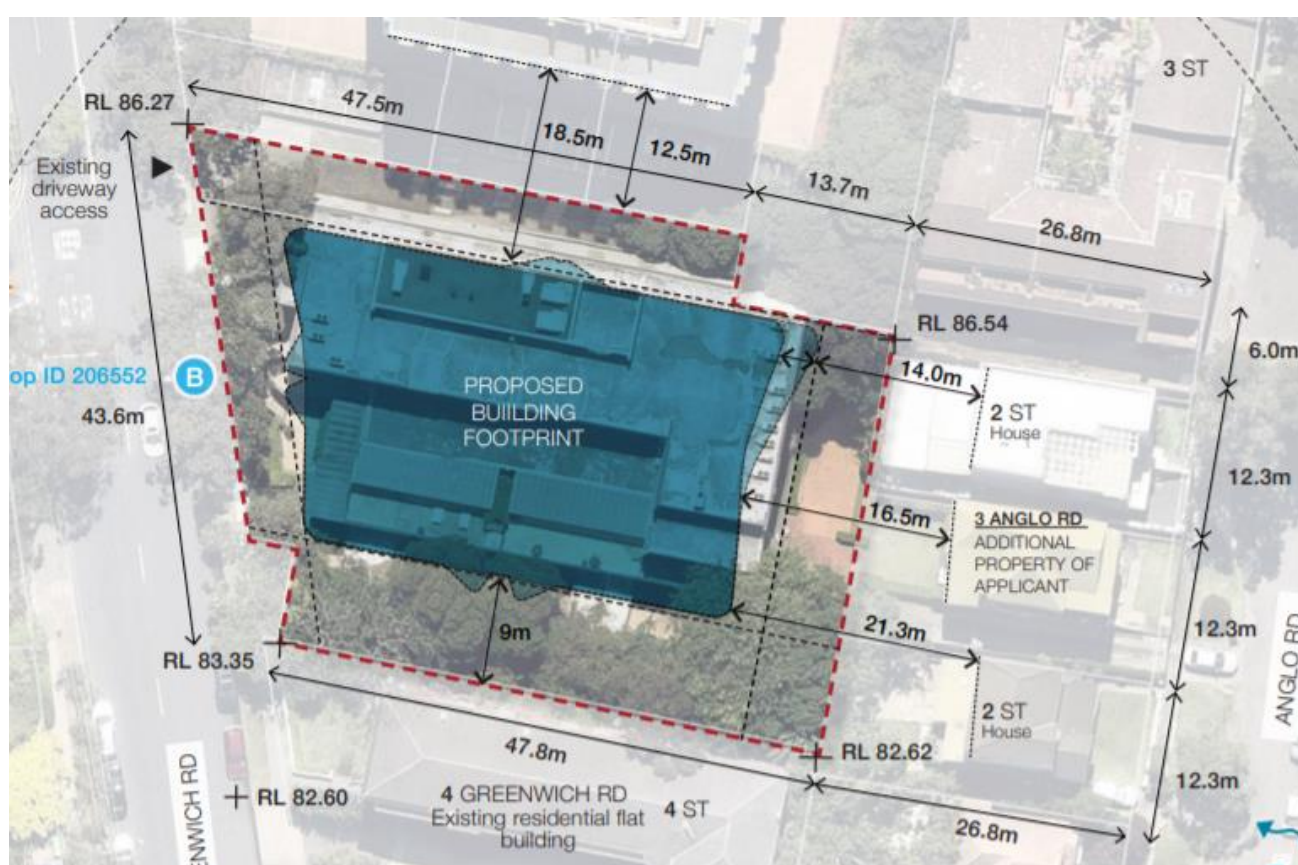
Source: *Marchese Partners*

### 4.3 Built Form

The development proposes an eight (8) storey building, plus 3 levels of basement car parking. The proposal includes lower ground and ground floor commercial and communal facilities, 40 ILUs and a rooftop garden area including a swimming pool, yoga space, open kitchen and outdoor dining. The proposed building envelope adopts minimum setbacks to the north (7m), south (9m), east (9m) and west (5m) to respond to the surrounding development and alignment of buildings adjoining the site boundary.

The proposed development will have a maximum GFA (calculated in accordance with the SL SEPP) of 6,413.9m<sup>2</sup> with a corresponding FSR of 3:1. The maximum height of the proposed development is 25.3m (calculated in accordance with the SL SEPP).

The proposed building footprint is pinched through the centre with the upper level balconies adopting a curvature form, popping in and out from Level 1 to Level 6. The rooftop is accessible with a pool and pergola structures with views directed towards the south. **Figure 14** below illustrates the proposed built form and setbacks.



**Figure 14 Proposed development footprint**

Source: *Marchese Partners*

#### 4.3.1 Basement Levels

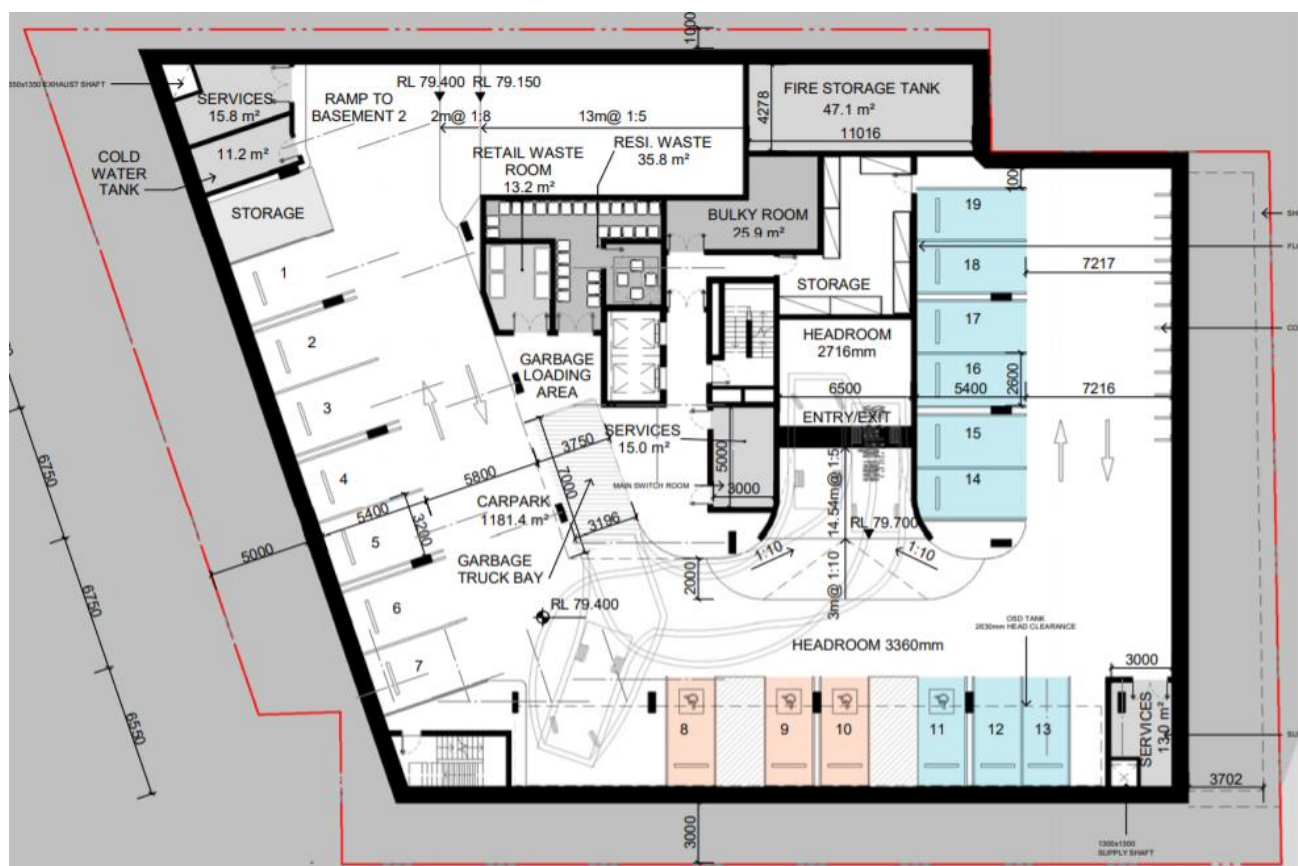
The proposed development will comprise 3 levels of basement car parking (Basement 1, Basement 2 and Basement 3). The basement levels will comprise parking for residents, visitors, commercial and retail uses, totalling 76 car parking spaces. Of the car parking, the following is to be provided:

**Table 3 Proposed car parking**

Land use component	Number
<b>Basement 1</b>	
Commercial / retail	8
Commercial / retail disabled	1

Land use component	Number
Seniors spaces	7
Visitors disabled	3
<b>Basement 2</b>	
Seniors Spaces	22
Visitors	5
Visitors disabled	1
<b>Basement 3</b>	
Seniors spaces	22
Visitors	5
Visitors disabled	2
<b>TOTAL</b>	<b>76</b>

The car park will be accessible from the existing ingress / egress point off Greenwich Road. 49 storage cages will be provided across the basement levels, providing a minimum of 5.75m<sup>3</sup> of storage space for residents. The general arrangement plan is shown at **Figure 15** below.



**Figure 15** Proposed Basement 1 arrangement plan

Source: Marchese Partners

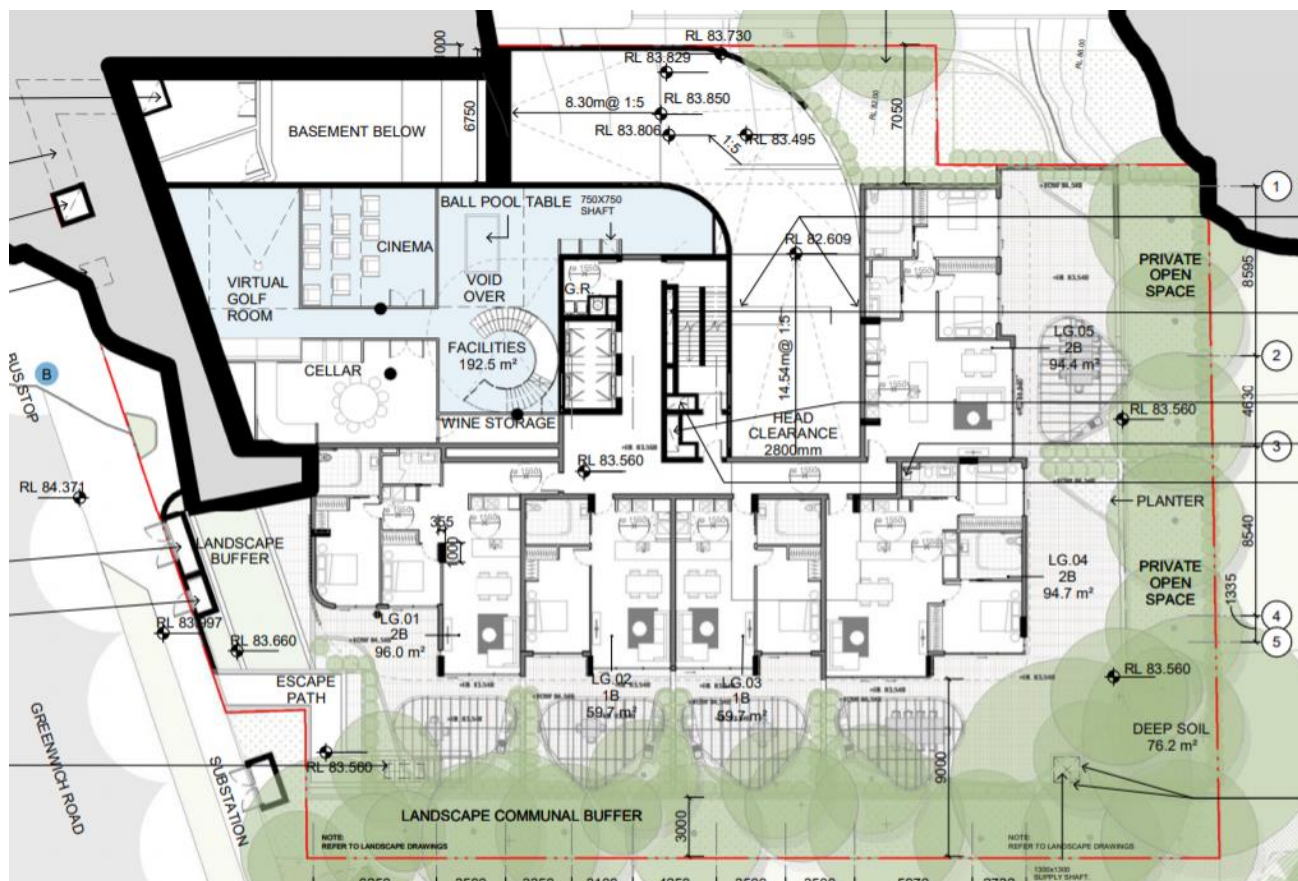
#### 4.3.2 Lower Ground

The lower ground level will comprise ILUs and commercial / retail facilities accessible to residents only. ILUs located on the lower ground level will be oriented on the southern and eastern aspects and will all be afforded access to private open space ranging from 47.9m<sup>2</sup> to 144.6m<sup>2</sup>. This level will comprise 5 ILUs, specifically 2 x 1 bedroom and 3 x 2 bedroom units.



On the northern portion of the lower ground level the proposed development will comprise 192.5m<sup>2</sup> of space dedicated to commercial / communal facilities, including beauty space (for use as hair salons etc.) and a cinema. Internal stair from the Ground Level will provide access to these facilities. This area will be located partially below ground, forming the part 7 storey and part 8 storey building envelope.

Area for the driveway ingress / egress and basement below is also provided on the northern alignment. The Lower Ground layout plan is shown at **Figure 16** below.



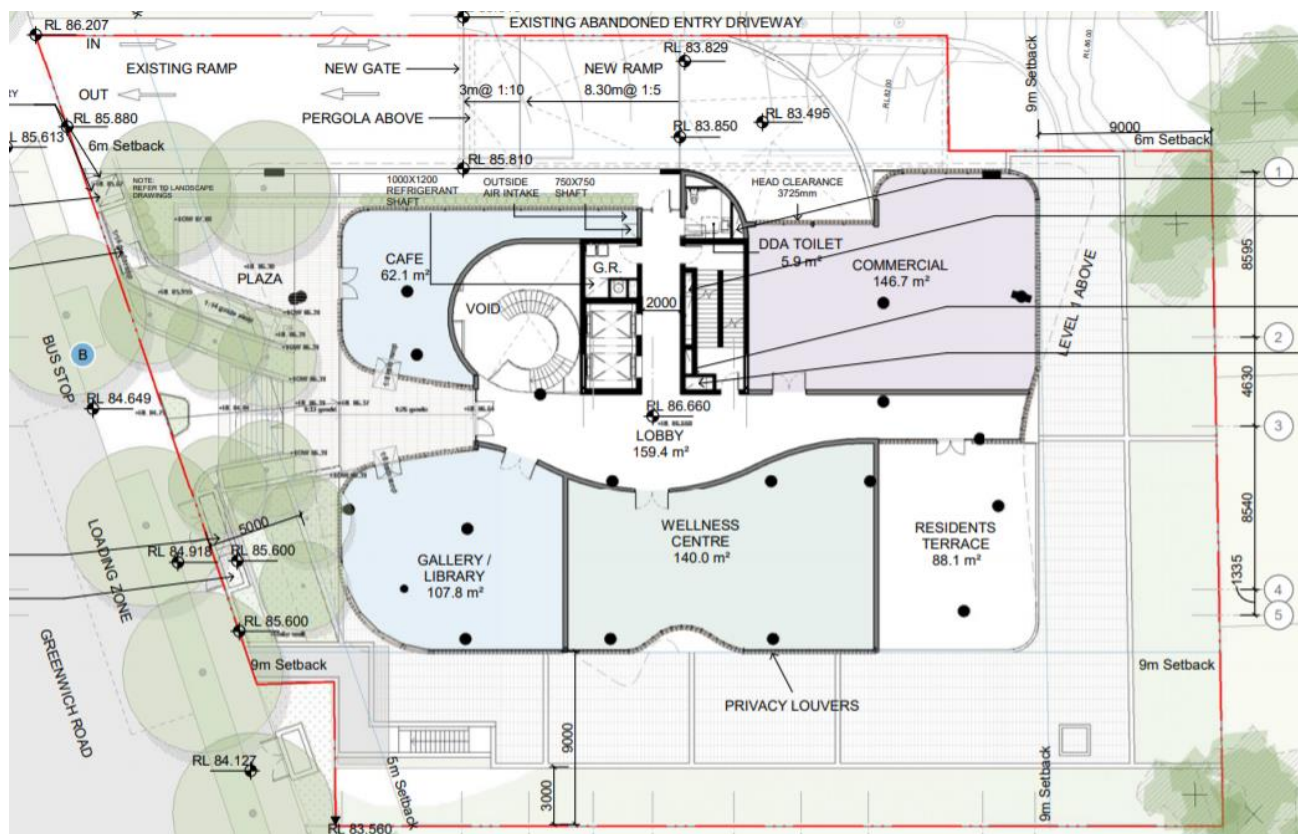
**Figure 16** Proposed Lower Ground floor plan

Source: Marchese Partners

### 4.3.3 Ground Level

The Ground Level will be the main entry point for residents and visitors to the site. The lobby area will be accessed directly off Greenwich Road. This level will generally comprise commercial / retail floor space including a café and commercial tenancy, gallery / library and wellness centre. An indoor/outdoor residents' terrace will be provided in the south eastern portion of the Ground Level.

A landscaped plaza area with bicycle parking will also be included on the north western portion to delineate the space between the driveway and pedestrian entrance. The general arrangement plan is shown at **Figure 17** below.



**Figure 17 Proposed Ground Level plan**

Source: Marchese Partners

#### 4.3.4 Level 1 – Level 6

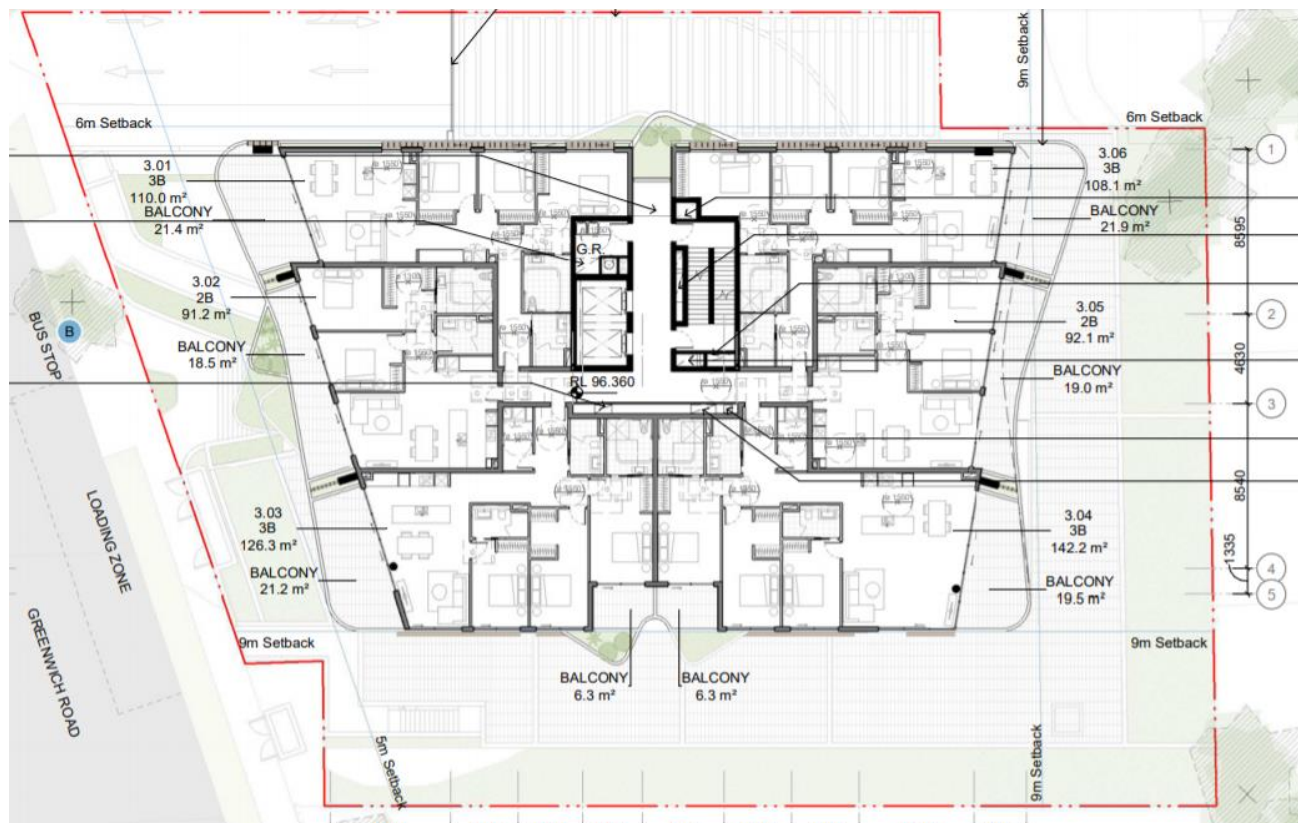
Level 1 to Level 6 of the proposed development will comprise 35 ILUs with associated private open space. These units will range in size from 1, 2 and 3 bedroom apartments.

The breakdown of apartments across each level of the development is provided in **Table 4** below.

**Table 4 Apartments per level**

Level	1 bedroom	2 Bedroom	3 bedroom	Total Count
Lower Ground	2	3	0	5
Level 1	1	4	2	7
Level 2	1	4	2	7
Level 3	0	2	4	6
Level 4	0	0	5	5
Level 5	0	0	5	5
Level 6	0	0	5	5
<b>Total</b>	<b>4</b>	<b>13</b>	<b>23</b>	<b>40</b>

All apartments will be oriented east, south or west to optimise views to the local district and Sydney Harbour with direct access to courtyards or balconies. The lift core will be located in the centre of each floor. The general arrangement plan is shown in **Figure 18** below.



**Figure 18 Proposed Level 3 plan**

Source: *Marchese Partners*

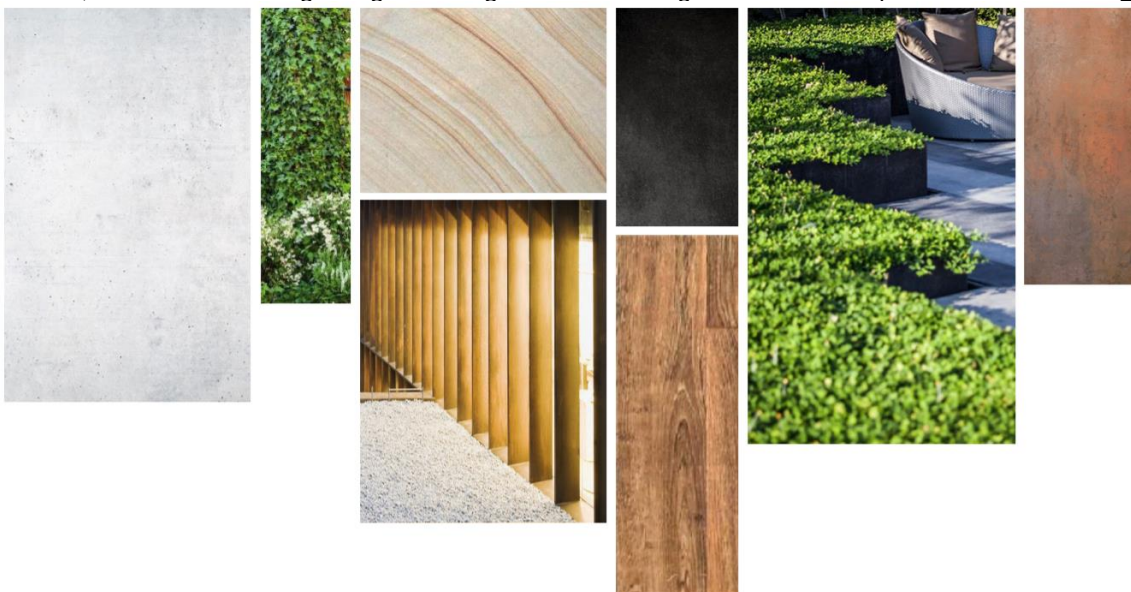
#### 4.3.5 Rooftop Garden

The southern aspect of the rooftop garden area will be accessible by all residents via a lift and stair. The garden area will comprise an open kitchen, outdoor dining, yoga area and a lap pool in the south western portion. The proposed swimming pool will have a depth ranging from 300mm in the shallow end to 1200mm in the deep end. The general arrangement plan is shown at **Figure 19** below.



Source: *Marchese Partners*

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 amenity to the streetscape. The proposed schedule of materials includes polish white exposed concrete, bronze vertical louvres, sandstone cladding and glass straight / curved railings. The materials palette is shown at **Figure 20** below.

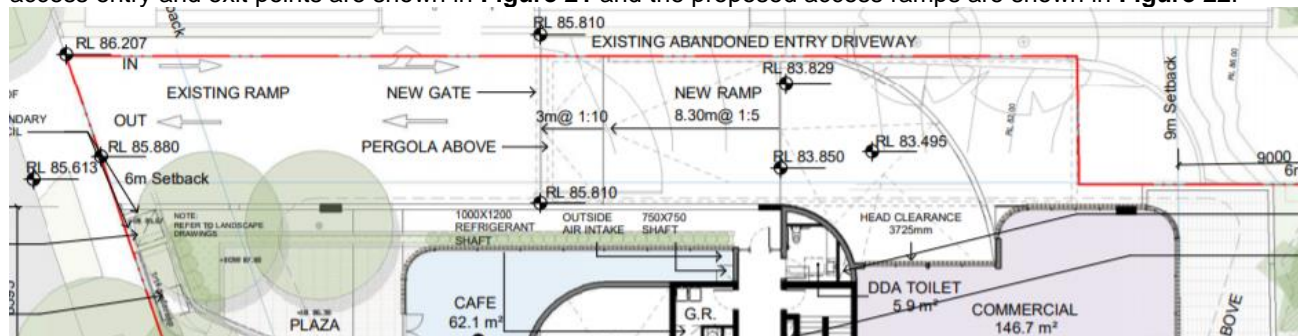


Source: *Marchese Partners*

## 4.5 Site Access

### 4.5.1 Vehicular Access

Vehicular access to the site will be provided via the existing driveway located off Greenwich Road which is also shared (by way of an easement) with the adjoining commercial property to the north, known as 154 Pacific Highway, Lane Cove. Waste collection will also be undertaken from within the basement car parking area. The vehicular access entry and exit points are shown in **Figure 21** and the proposed access ramps are shown in **Figure 22**.



**Figure 21** Vehicular access from Greenwich Road (entry / exit shown blue)

Source: Marchese Partners / Ethos Urban



**Figure 22** Proposed new access ramps to basement car parking

Source: Marchese Partners

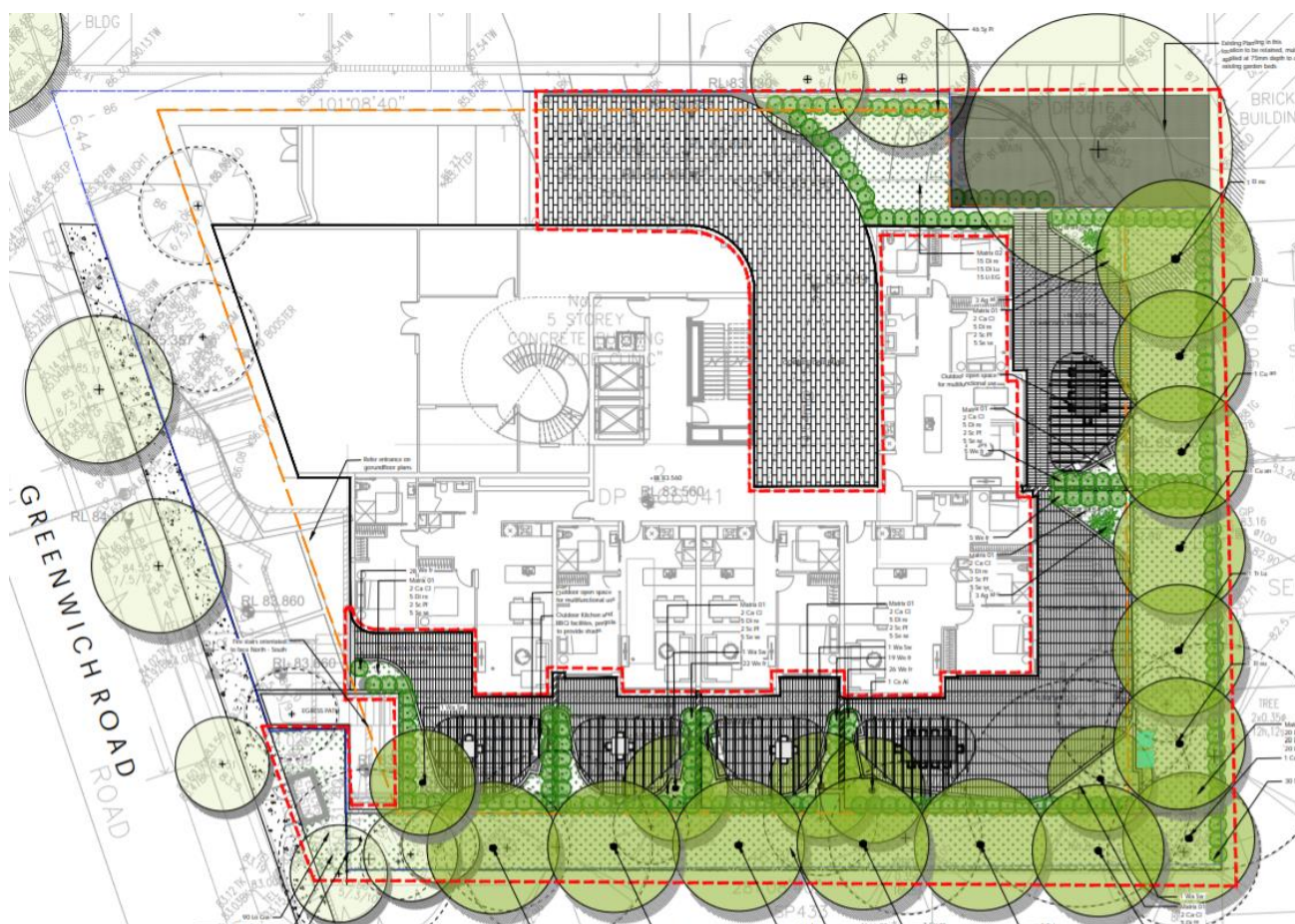
### 4.5.2 Pedestrian Access

Pedestrian access will be provided via the existing entry point off Greenwich Road. The pedestrian access point to the lobby area and café will be clearly delineated from the driveway through the use of landscaping.



## 4.6 Landscaping

Landscaping drawings have been prepared by Distinctive Living Design and are included at **Appendix D**. The overall landscaping strategy has been informed by the site's immediate context, enhancing the outlook from individual units as well as providing a plaza area in the site's street frontage to Greenwich Road. The key elements of the proposed landscaping include a deep soil zone along the southern and eastern boundaries and in a portion of the plaza area on the northern site boundary as well as low level planting on the Lower Ground Level courtyards. The proposed landscaping is shown at **Figure 23** to **Figure 25** below and the planting schedule including species size and quantity are included at **Appendix D**.



**Figure 23** Proposed Lower Ground Level landscaping

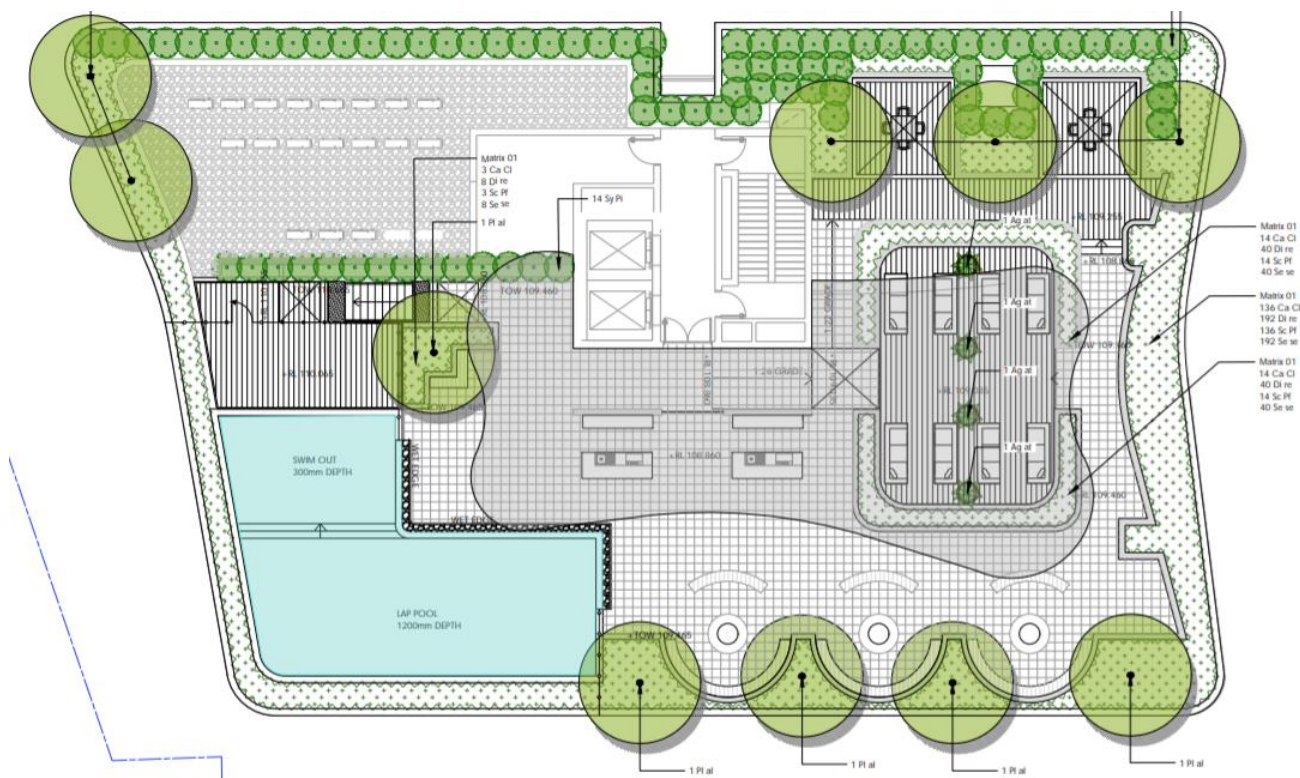
Source: Distinctive Living Design





**Figure 24** Proposed Ground Level landscaping

Source: Distinctive Living Design



**Figure 25** Proposed rooftop level landscaping

Source: Distinctive Living Design

## 4.7 Waste Management

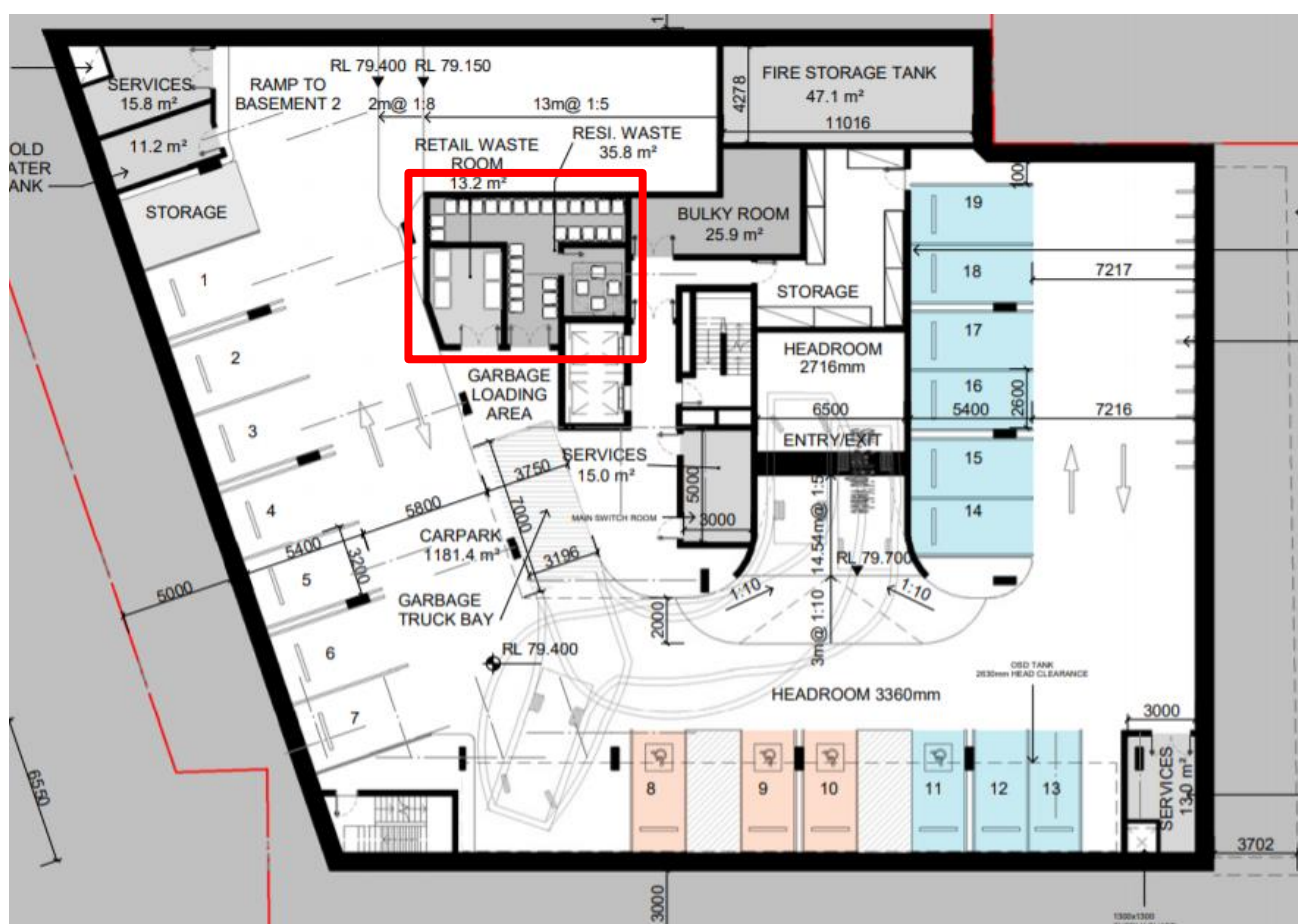
General waste bins will be provided on each residential level. One 240L co-mingled recycling and one 240L co-mingled bin for paper product recycling will also be placed on each level, as well as a garbage chute installed on each residential level. The residential common areas will be supplied with suitable branded waste and recycling bins where considered appropriate.

Council will be engaged to collect the residential waste and recycling in accordance with Council's collection schedule. The waste collection vehicle will enter the site from Greenwich Road and park within the loading bay on Basement Level 1. The waste collection staff will collect the bins directly from the bin holding room.

Retail tenants will be provided with access to a retail waste room containing 240L bins for the collection of waste and recycling. Tenants will be responsible for their own storage of garbage and recycling during daily operations.

A private contractor will be engaged to collect the retail waste and recycling to an agreed schedule. The waste collection vehicle will enter the site from Greenwich Road and parking the designated loading bay on Basement Level 1. The waste collection staff will collect the bins directly from the retail waste room.

The waste storage areas and loading bay is shown on **Figure 26** below.



**Figure 26** Basement Level 1 – waste collections rooms outlined red

Source: Marchese Partners

## 4.8 Stormwater Management

The proposed development will provide a new on-site detention (OSD) basin in the south eastern corner on the lower ground level. The new OSD tank will have a storage volume of 85m<sup>3</sup>. Stormwater conveyed from the OSD will discharge into the stormwater pit on Anglo Road.

This system will formalise existing site drainage on the site. Civil Plans have been prepared by BG&E and are included in **Appendix H**.

#### **4.9 Services and Utilities**

An Infrastructure Services Report has been prepared by Lakiss & Associates Consulting Engineers and is included at **Appendix R**.

##### **Electricity**

Electrical infrastructure for the proposed development will be provided by Ausgrid. The existing building is served by a substation which is located adjacent to the site. It is anticipated that the substation will have ample capacity to serve the development and an application will be submitted to Ausgrid for reuse of the substation.

##### **Water and Sewer**

A pressure and flow enquiry was submitted to Sydney Water and results were obtained in April 2020. The Sydney Water plan shows a water main on Greenwich Road and sewer main on the eastern side of the development. It is anticipated that the existing sewer has capacity to service the proposed development. In relation to the water main, it is expected that the existing main is adequate to connect and service the proposed development.

In addition, a 80m<sup>3</sup> OSD tank will be located on the south eastern boundary on the Lower Ground Level.

##### **Gas**

The proposed development will be connected to the existing gas main. The gas main is anticipated to have adequate capacity to serve the proposed development. An application will be made to JEMENA for approval.

#### **4.10 Construction Impacts**

A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to the commencement of works. The CMP will address the following matters:

- Material management;
- Construction traffic management;
- Health and safety;
- Equipment / materials staging and parking;
- Dust control measures; and
- Methods for disposal of demolition waste.



## 5.0 Planning Assessment

This section considers the planning issues relevant to the proposed development and provides an assessment of the relevant matters prescribed in section 4.15(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

### 5.1 Compliance with Relevant Strategic Plans and Policies

#### 5.1.1 Strategic Plans and Policies

The consistency of the proposed development with the relevant strategic plans and policies is detailed in **Table 5** below.

**Table 5 Summary of key strategic plans and policies**

Plan	Comments
<b>Relevant Strategic Plans</b>	
A Metropolis of Three Cities – The Greater Sydney Region Plan	<p>The Department of Planning, Industry and Environment (previously the Department of Planning and Environment), released the final Greater Sydney Region Plan in March 2018. 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 following objectives outlined in the Plan:</p> <ul style="list-style-type: none"> <li>• Services and infrastructure to meet communities' changing needs;</li> <li>• Communities are healthy, resilient and socially connected;</li> <li>• Greater housing supply; and</li> <li>• Housing is more diverse and affordable.</li> </ul> <p>The proposed development will increase the diversity of housing types for seniors within the Lane Cove LGA, by providing new seniors housing in an accessible location, with good bus and train station connections.</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 support the strategic growth of Sydney's North District. The North District Plan recognises the large proportion of growth in older people to 2036, with an 85% increase in people aged 85 and over, and a 47% increase in the 65-84 year age group. This equates to 20% of the District's population being aged 65 or over in 2036, up from 16% in 2016. Importantly, the Lane Cove LGA will represent the second largest proportion of people aged 65 years and over between 2016-2036 following North Sydney.</p> <p>Specifically, 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 in close proximity to family, friends and established health facilities and services. Accordingly, the proposed development has the ability to align with <i>Planning Priority 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"> <li>• Recognises the demand for different housing types and tenures within accessible locations, specifically, aged care facilities.</li> <li>• 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</li> <li>• Fosters a healthy, creative, culturally rich and socially connected community.</li> </ul> <p>Accordingly, the proposed development is consistent with these aims, by demonstrating a commitment to planning for demographic change through the delivery of greater housing choice and community support for seniors and / or people with a disability.</p>
Draft St Leonards and Crows Nest 2036 Plan	<p>The draft St Leonards and Crows Nest 2036 Plan was released in October 2018 and aims to support continued growth in the health and technology sectors while becoming a major centre for workers, residents, students, visitors and the local population. Amongst other things, the Plan notes that by 2036 St Leonards and Crows Nest will be a 'home for people of all ages', where it will provide a greater mix of home for the diverse range of people that live in the area.</p> <p>Despite being identified for mix use in the Crows Nest St Leonards Interim Statement, which preceded the Draft Plan, the Draft Plan does not identify any change to the B3 Commercial Core zone that would enable other residential uses to occur on the site. The merits of retaining Commercial</p>

Plan	Comments
	Core on this site at the periphery of the very centre without a frontage to the Pacific Highway and adjacent to residential areas on 3 sides, has been the subject of significant debate as part of the Ramsay Planning Proposal. It is noted the final Plan may result in a further change to the position of commercial uses on this site, however as the application is made pursuant to the Seniors Living SEPP the final outcome of the Plan is not relevant to this DA.

## 5.2 Environmental Planning Instruments

The DA's consistency and compliance with the relevant environmental planning instruments is considered in the sections below. The key standards and guidelines highlighted in the table are discussed in the following sections of this environmental assessment.

### 5.2.1 State Environmental Planning Policies

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

**Table 6 Summary of consistency with State Environmental Planning Policies**

Plan	Comments
State Environmental Planning Policy No 55 – Remediation of Land	SEPP 55 aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. A Preliminary Site Investigation has been prepared by Trace Environmental and is included at <b>Appendix K</b> . While the report confirms that no historical potentially contaminating activities have been identified which may have resulted in potential contamination, except for possible imported fill of unknown sources, the report recommends that a Hazardous Materials Survey and Detailed Site Investigation is undertaken following demolition.
State Environmental Planning Policy No 65 - Design Quality of Residential Apartment Development	The proposed development has been assessed against the provisions of SEPP 65 and the Apartment Design Guide by Marchese Partners and is included at <b>Appendix C</b> . The proposed development achieves a high level of residential amenity, however where variations to the ADG are proposed they are discussed below in <b>Section 5.5</b> .
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	A BASIX Certificate is provided in <b>Appendix M</b> .
State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004	The proposed development seeks approval for seniors housing in the form of independent living units (in-fill selfcare housing) under the Seniors SEPP. The proposed development's consistency with the applicable controls within the Seniors SEPP is discussed below.
State Environmental Planning Policy (State and Regional Development) 2011	As the site has a CIV greater than \$30 million it is regional development and the consent authority will be the Sydney North Planning Panel.

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

The Seniors SEPP permits the development of certain types of seniors housing and sets out certain standards that override local planning provisions. The Seniors SEPP applies to land that is either zoned for urban purposes or land that adjoins land zoned primarily for urban purposes, but only if dwelling houses, RFB and hospitals are permissible on the land of if the site is zoned for special uses (schools, churches etc.).

The site is zoned B3 Commercial Core which is land zoned primarily for urban purposes. While dwelling houses, RFBs and hospitals are prohibited on the site under the LCLEP 2009, hospitals are a permissible use on the site under Division 10, clause 57 (1) of the State Environmental Planning Policy 2007 – Infrastructure (ISEPP). This means that the B3 Commercial Core zone is identified as a prescribed zone on which hospitals are permissible. Seniors Living is therefore permissible pursuant to the Seniors SEPP on the basis that the site is zoned primarily for urban purposes (B3 Commercial Core) on which hospitals are permissible (under the ISEPP).

**Table 7** below provides an assessment of the proposed development against the relevant clauses in the Seniors SEPP.

**Table 7 Assessment against State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004**

Provision	Response
<i>Clause 19 Use of seniors housing in commercial zones</i>	No residential uses are proposed for any part of the ground floor of a building that fronts a street.
<b>Part 2 Site Related Requirements</b>	
<i>Clause 26 Location and access to facilities</i>	The proposed development is compliant with the access requirements of Clause 26. Accessible paths which provide access to transport and services are located within 400m of the site. A bus stop is located directly outside the site on Greenwich Road, providing bus services to Lane Cove, Crows Nest and North Sydney Train Station.
<i>Clause 27 Bush fire prone land</i>	The site is not located on land identified as bushfire prone.
<i>Clause 28 Water and Sewer</i>	The subject site is located within an established residential / commercial area that has access to adequate facilities for the disposal or removal of sewage. The proposed development is capable of being connected to a reticulated water system and infrastructure for the provision of sewage. Necessary arrangements will be made with Sydney Water for connections to the water / sewer system.
<i>Clause 30 – Site analysis</i>	A detailed site analysis plan has been prepared by Marchese Partners and is included at <b>Appendix A</b> . The site analysis is supported by this SEE.
<i>Clause 31 - Design of in-fill self-care housing</i>	The proposed development has taken into consideration the provisions of the Seniors Living Policy: Urban Design Guideline for Infill Development published by the Department of Infrastructure, Planning and Natural Resources in March 2004.
<i>Clause 32 – Design principles</i>	The proposed development has been designed with regard to the principles of Division 2 (cl 33-39).
<b>Clause 33 – Neighbourhood Amenity and Streetscape</b>	
<i>(a) recognise the desirable elements of the location's current character (or, in the case of precincts undergoing a transition, where described in local planning controls, the desired future character) so that new buildings contribute to the quality and identity of the area, and</i>	The proposed development has been designed with regard to the site's existing context, particularly the surrounding development. The building alignment recognises those of adjoining development's, while providing a more active street frontage through the inclusion of a plaza area with bicycle parking and a large entry lobby providing access to commercial facilities for residents. The architectural style has been informed by the massing of surrounding development and therefore the proposal complements the range of surrounding land uses and integrates with the adjoining built form.
<i>(b) retain, complement and sensitively harmonise with any heritage conservation areas in the vicinity and any relevant heritage items that are identified in a local environmental plan,</i>	The site is not located within a heritage conservation area and is not in close proximity to any existing heritage items.
<i>(c) maintain reasonable neighbourhood amenity and appropriate residential character by:</i> <i>(i) providing building setbacks to reduce bulk and overshadowing, and</i> <i>(ii) using building form and siting that relates to the site's land form, and</i> <i>(iii) adopting building heights at the street frontage that are compatible in scale with adjacent development, and</i> <i>(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and</i>	The proposed development maintains reasonable neighbourhood amenity as it: <ul style="list-style-type: none"> <li>• Provides appropriate setbacks that allow for internal amenity while not resulting in any adverse impacts to surrounding residents;</li> <li>• Provides a built form that is compatible with the surrounding streetscape and siting; and</li> <li>• Adopts a maximum building height that is largely commensurate to a compliant built form for a commercial building under the LCLEP 2009 development standards.</li> </ul> Further discussion is provided in <b>Section 5.4</b> .
<i>(d) be designed so that the front building of the development is set back in sympathy with, but not necessarily the same as, the existing building line, and</i>	<ul style="list-style-type: none"> <li>• The proposed setback to Greenwich Road is considered appropriate in the context of the surrounding development. There is no predominant setback on Greenwich Road. Accordingly the proposal adopts the applicable DCP setback of 5m to the front boundary. In saying this, the proposal provides additional relief and visual interest through the pinched architectural style and curvature form of</li> </ul>

Provision	Response
	balconies on Level 1 to Level 6 which setback further from the boundary.
<i>e) embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and</i>	The proposed development includes hard and soft landscaping to respond to the existing environment, while providing appropriate spaces and outlook for residents. The proposal will include 15% deep soil zones. Further discussion on the proposed landscaping arrangement including tree species, quantity and size of planting is included in the Landscape Plans at <b>Appendix D</b> .
<i>(f) retain, wherever reasonable, major existing trees, and</i>	The proposed development seeks to retain all trees where possible, however seeks consent for the removal of 13 trees as a result of the proposed development. These trees have been assessed as being appropriate for removal as identified in the Arboricultural Impact Assessment at <b>Appendix F</b> . Notwithstanding, the proposal includes the requirement of 15% deep soil which will allow for the planting of substantial trees. The proposal will also include soft and hard landscaping features that will offset the removal of trees on the site. Further detail is provided in the Landscape Plans at <b>Appendix D</b> .
<i>(g) be designed so that no building is constructed in a riparian zone.</i>	The site is not located on a riparian corridor.
<b>Clause 34 – Visual and Acoustic Privacy</b>	
<i>The proposed development should consider the visual and acoustic privacy of neighbours in the vicinity and residents by:</i>	
<i>(a) appropriate site planning, the location and design of windows and balconies, the use of screening devices and landscaping,</i>	The orientation and design of windows and balconies for habitable rooms has been carefully considered in the design of the proposed development. While the proposal results in a minor non-compliance for setbacks to adjoining properties as specified in the ADG, the orientation of rooms and the inclusion of appropriate vegetation is considered appropriate to provide visual and acoustic amelioration. In particular, the inclusion of a deep soil zone on the eastern boundary will greatly assist in reducing the obtrusive nature of the proposed development from neighbouring sites.
<i>(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.</i>	Only a very limited number of future dwellings will be positioned in proximity to the existing driveway. These include those dwellings located on the on the Lower Ground Floor, however they have been oriented to face east and south so as to be the furthest from the driveway. These dwellings will also be fit with appropriate acoustic amelioration measures to mitigate any noise from the driveway and carpark below. Notwithstanding this, given the nature of the development being for seniors housing it is considered that the use of the car park will not be during night time hours and rather will only be used by residents, visitors and some staff during the day time period.
<b>Clause 35 – Solar Access and Design for Climate</b>	
<i>(a) ensure adequate daylight to the main living areas of neighbours in the vicinity and residents and adequate sunlight to substantial areas of private open space, and</i>	<p>The proposed development has been designed to maximise solar access internally for all ILUs, adjoining development and private open space. While 57.5% of apartments will receive adequate solar access internally, those that do not receive the required level of solar access have been oriented south to maximise views towards the local district and Sydney Harbour.</p> <p>The shadow diagrams prepared by Marchese Partners illustrate that while the proposed development will result in increased overshadowing to adjoining residential development, it largely remains in line or results in less overshadowing than would otherwise be considered under the establishment of a compliant building envelope for a commercial building. Further discussion is provided in <b>Appendix A</b> and at <b>Section 5.5.2</b> below.</p>
<i>(b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation solar heating and lighting by locating the windows of living and dining areas in a northerly direction</i>	57.5% of all units will receive a minimum of two hour of direct sunlight during the winter solstice. 68% of units achieve a high level of cross ventilation.



Provision	Response
	All units have been oriented and configured with regard to existing surrounding development and the outlook towards Sydney Harbour and the local district that can be seen from within apartments.
Clause 36 – Stormwater	
(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas,	The proposed development will minimise disturbance and impacts of stormwater runoff to adjoining properties by formalising the stormwater system through the introduction of a new OSD tank. New paved areas on the site will drain to the tank via a pit and pipe drainage system or overland flow paths.
(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.	A new 85m <sup>3</sup> OSD tank is proposed in the south eastern of the site to formalise stormwater drainage.
Clause 37 – Crime Prevention	
(a) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins any such area, driveway or street, and	The proposed development has been designed to allow for active uses on the ground level and apartments above to provide appropriate security, while allowing for an appropriate level of passive surveillance.  An appropriate security system will be put in place for residents and shared entries will be lockable. This system will also allow residents to see who would like to visit and who is approaching their apartment without the need to open their door.
(b) where shared entries are required, providing shared entries that serve a small number of dwellings and that are able to be locked, and	
(c) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.	
Clause 38 – Accessibility	
The proposed development should:	
(a) have obvious and safe pedestrian links from the site that provide access to public transport services or local facilities, and	The front setback of the proposed development will provide appropriate landscaping to provide safe and amenable paths of travel for residents, staff and visitors. A public bus stop is located directly outside the site on Greenwich Road which will provide access to local facilities including Crows Nest shops.
(b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.	The proposed development provides distinct pedestrian and vehicular access points, improving safety across the site. The entry lobby to the proposed development has been appropriately delineated from the driveway entrance through landscaping and the inclusion of a ‘plaza’.  Resident, visitor and staff car parking access is provided via the existing driveway along the northern boundary to the 3 levels of basement car parking. The car parking arrangement will be secure and convenient, with internal lift access provided to residents, visitors and staff.
Clause 39 – Waste Management	
The proposed development should be provided with waste facilities that maximise recycling by the provision of appropriate facilities	Dedicated waste management rooms and facilities have been incorporated within the proposed development, including separate residential and commercial waste storage areas in the basement levels. Further discussion is provided in <b>Section 5.8</b> .
Clause 40 – Development Standards	
Site Size – Minimum 1,000sqm	Compliant. The site is significantly larger than 1,000 square metres.
Site Frontage – Minimum 20m	Compliant. The site has a street frontage to Greenwich Road of approximately 30m.
Height zones where residential flat buildings are not permitted If the development is proposed in a residential zone where residential flat buildings are not permitted:	Not applicable. The proposed development is not in a residential zone.

Provision	Response
<ul style="list-style-type: none"> <li>the height of all buildings in the proposed development must be 8 metres [as defined within the Seniors Housing SEPP] or less, and</li> <li>a building that is adjacent to a boundary of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) must be not more than 2 storeys in height, and</li> <li>a building located in the rear 25% area of the site must not exceed 1 storey in height.</li> </ul>	
<b>Clause 50 – Standards that cannot be used to refuse development consent for self-contained dwellings</b> Note: The provisions of this clause do not impose any limitations on the grounds on which a consent authority may grant development consent	
(a) <b>building height:</b> if all proposed buildings are 8 metres or less in height (and regardless of any other standard specified by another environmental planning instrument limiting development to 2 storeys), or	The proposed development has a maximum building height of 25.3m. Refer to <b>Section 5.4.2</b> for further discussion.
(b) <b>density and scale:</b> if the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,	The proposed FSR is 3:1.
(c) <b>landscaped area:</b> if: (i) in the case of a development application made by a social housing provider – a minimum of 35 square metres of landscaped area per dwelling is provided; or (ii) in any other case – a minimum of 30% of the area of the site is to be landscaped	Alceon Group is not a social housing provider. A total of 1,778m <sup>2</sup> is proposed to be landscaped. This equates to a total landscaped area of 83% of the site area.
(d) <b>Deep soil zones:</b> if, in relation to that part of the site (being the site, not only of that particular development, but also of any other associated development to which this Policy applies) that is not built on, paved or otherwise sealed, there is soil of a sufficient depth to support the growth of trees and shrubs on an area of not less than 15% of the area of the site (the <b>deep soil zone</b> ). Two-thirds of the deep soil zone should preferably be located at the rear of the site and each area forming part of the zone should have a minimum dimension of 3 metres,	Compliant. 15% deep soil is proposed.
(e) <b>solar access:</b> if living rooms and private open spaces for a minimum of 70% of the dwellings of the development receive a minimum of 3 hours direct sunlight between 9am and 3pm in mid-winter,	The proposed development has been designed to maximise solar access internally for all ILUs, adjoining development and private open space. While 57.5% of apartments will receive adequate solar access internally, those that do not receive the required level of solar access have been oriented south to maximise views towards the local district and Sydney Harbour. Further discussion is provided in <b>Section 5.5.2</b> .
(f) <b>private open space for in-fill self-care housing:</b> if: (i) in the case of a single storey dwelling or a dwelling that is located wholly or in part, on the ground floor of a multi-storey building, not less than 15 square metres of private open space per dwelling is provided and, of this open space, one area is not less than 3 metres wide and 3 metres long and is accessible from a living area located on the ground floor, and (ii) in the case of any other dwelling, there is a balcony with an area of not less than 10 square metres (or 6 square metres for a 1 bedroom dwelling), that is not less than 2 metres in either length or depth and that is accessible from a living area,	Compliant. The proposed development provides private open space in the form of courtyards or balconies from each individual apartment. Private open space will range in size from 15.2m <sup>2</sup> to 55.1m <sup>2</sup> .
(d) <b>parking:</b> if at least the following is provided:	Alceon Group is not a social housing provider.

Provision	Response
<p>(i) 0.5 car spaces for each bedroom where the development application is made by a person other than a social housing provider, or</p> <p>(ii) 1 car space for each 5 dwellings where the development application is made by, or is made by a person jointly with, a social housing provider.</p>	The proposed car parking has been provided in accordance with Seniors SEPP. Further discussion is provided in <b>Section 5.6</b> .

## 5.2.2 Lane Cove Local Environmental Plan 2009

The key applicable planning provisions for the site are outlined in **Table 8** below.

**Table 8 Assessment against Lane Cove Council Local Environmental Plan 2009**

Clause	Provision / Standard	Proposal
Clause 2.3 Zone Objectives and Land Use Table	B3 Commercial Core	<p>The site is zoned B3 Commercial Core. Residential accommodation, including seniors housing, is a prohibited use under this zone. Notwithstanding, hospitals are a permissible use on the site under Division 10, clause 57 (1) of the ISEPP as the B3 zone is identified as a prescribed zone. Seniors housing is therefore permissible with consent pursuant to the Seniors SEPP on that basis that the site is zoned primarily for urban purposes on which hospitals are permissible (under the ISEPP).</p> <p>Notwithstanding this, the proposed development is considered to be consistent with the objectives of the B3 zone in that:</p> <ul style="list-style-type: none"> <li>The proposal provides a range of retail and community uses to serve the local and wider community, in an area surrounding by residential development;</li> <li>The proposal provides employment uses in an accessible location;</li> <li>The proposal generally falls within the parameters of a building envelope for a commercial development; and</li> <li>The proposal provides an improved urban design outcome where it allows for increased activation along Greenwich Road.</li> </ul>
Clause 4.3 – Height of Buildings	25m	<p>25.3m</p> <p>Noting that height is to be measured in accordance with the Seniors SEPP and not the LEP, the proposed building is generally located below the maximum building height control LCLEP 2009, with a minor 0.3m non-compliance where the land slopes in the south western corner. The additional height does not adversely impact on neighbours in terms of overshadowing and is less than the 33m height limit as proposed in the 2018 Planning Proposal for the site that received a Gateway Determination. Further discussion is provided in <b>Section 5.4.2</b>.</p>
Clause 4.4 – Floor Space Ratio	3:1	<p>2.62:1 (measured in accordance with the LEP definition).</p> <p>The proposed development complies.</p>
Clause 4.6- Exceptions to development standards	Although the proposal breaches the LCLEP 2009 height of buildings development standard, the Seniors SEPP prevails in this instance and a clause 4.6 variation is not required. Further discussion is provided in <b>Section 5.4.2</b> .	
Clause 5.10 – Heritage	The site is not heritage listed nor is it located in a heritage conservation area.	
Clause 6.1 – Acid sulfate soils	The site is not located on land identified as Acid Sulfate Soils, nor is it in close proximity to any land identified as Class 1, 2, 3, 4 or 5. Therefore, no further assessment is required.	

### 5.3 Development Control Plans

The proposed development is consistent with the objectives of the LCDCP 2010 and the relevant development controls. 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. In lieu of the objectives and controls in the LCDCP 2010 for the proposed use as seniors housing, the key aspects are considered in **Table 9** and where alternate solutions are proposed, they are discussed in the following sections of this environmental assessment.

**Table 9 Key applicable planning provisions for residential flat buildings**

Provision	Proposal	Assessment location
<b>D1 General Provisions</b>		
<i>1.1.1 Building to street frontages</i>	The proposed development adopts a 5m setback from Greenwich Road. This is considered suitable as it responds to the alignment of adjoining buildings while incorporating landscaping and pedestrian entry points to the lobby and ground floor café. The setback will also include a plaza area with formal landscaping and bicycle parking. This assists in reinforcing and delineating pedestrian and vehicle entry points, while improving pedestrian amenity along Greenwich Road.	<b>Section 5.4</b>
<i>1.1.2 Street frontage heights</i>	The proposed development adopts a building height of 25.3m. While this marginally exceeds the maximum building height prescribed by the LCLEP 2009, it is largely commensurate to the built form of the building envelope of a commercial building on the site. Further discussion on compliance of the proposed building height is provided in <b>Section 5.4.2</b> .	<b>Section 5.4.2</b>
<i>1.1.3 Street frontage activities</i>	The proposed development retains the existing pedestrian and vehicular street frontages from Greenwich Road. It also includes a café on the with doors opening onto the plaza and a gallery / library on the Ground Level. This provides greater activation to Greenwich Road and does not result in any blank walls on the building's street frontage. Further, these uses along with the plaza and bicycle parking spaces provides a pedestrian oriented space that aligns with the objectives of provision 1.1.3 in that it adds life along Greenwich Road.	-
<i>1.1.4 Building Depth and Bulk</i>	The proposed development is for seniors housing which is permissible with consent under the ISEPP as discussed in <b>Section 5.2.1</b> . Notwithstanding, the proposed development does not exceed the maximum FSR prescribed by the LCLEP 2009 of 3:1, where the proposal seeks consent for a FSR of 3:1.	-
<i>1.1.6 Setbacks</i>	The proposed development provides a minimum 5m setback on all boundaries. The building setbacks are further discussed in <b>Section 5.5.4</b> .	<b>Section 5.5.4</b>
<i>1.1.7 Building Design and Exteriors</i>	The Lower Ground level adopts a 3.1m floor to ceiling height and the Ground Level adopts a 3.5m floor to ceiling height. Level 1 to Level 5 adopt a 3.1m floor to ceiling height and Level 6 adopts a 2.7m floor to ceiling height. The proposed development complies.	-
<i>1.2 Excavation</i>	Any excavation of the site will remain within the footprint of the development.	-
<i>1.3 Design and location of on-site parking</i>	Car parking on the site has been assessed with regards to the required rates under the Seniors SEPP. The car park will be accessible from the existing Greenwich Road driveway. The vehicular entry point will be clearly delineated from the pedestrian entry through landscaping.  All car parking and loading / service areas are located on Basement Level 1 to 3 and will therefore be screened from the public domain and residential levels. The vehicular access point is not located on the boundary adjacent to a residential boundary.  All residential, retail / commercial and visitor car parking will be clearly delineated by signage.	<b>Section 5.6</b>
<i>1.4 Car parking</i>	As specified in Part R of the Lane Cove DCP, for the proposed development car parking is to be assessed under the Seniors SEPP.	<b>Section 5.6</b>

1.5 Awnings	No awnings are proposed. The site is not considered to be located on a main street or major retail street.	-
1.6 Reflectivity	The proposed development comprises concrete, timber and stone and limited areas that comprises a large extent of glazing. A Reflectivity Report is not considered necessary as the proposal would not result in adverse glare from the surrounding public domain.	-
1.8 Landscaping	<p>The proposal incorporates all car parking within Basement Level 1 – Level 3.</p> <p>An OSD tank will be provided to formalise the site's stormwater and groundwater management.</p> <p>The site will incorporate 15% deep soil zone predominantly along the eastern and southern boundaries as well as the plaza area on Greenwich Road.</p>	-
1.9 Planting on Structures	The proposed development includes a range of mass planting on the Lower Ground and Ground Levels as well as on the Rooftop Level. The Landscape Plans included in <b>Appendix D</b> illustrate that the depth and area for plant growth is suitable for each species.	<b>Appendix D</b>
1.10 Solar Access	57.5% of apartments will receive the required solar access. Further discussion is provided in <b>Section 5.5</b> .	<b>Section 5.5.2</b>
1.11 Access and Mobility	An Access Report has been prepared by BCA Logic and is included at <b>Appendix O</b> .	<b>Section 5.9</b>
1.13 Signage	No signage is proposed as part of this application.	-
<b>D4 St Leonards (B3) Commercial Core Zone and Mixed Use</b>		
4.2 Desired Future Character of St Leonards	<p>The proposed development is considered to align with the objectives of provision 4.2 of the Lane Cove DCP. Specifically, while the proposal is for seniors housing it will greatly improve the pedestrian environment along Greenwich Road through the introduction of active uses on the ground level and an appropriate built form that has been designed through careful consideration. The proposed development is considered to be appropriate in the context of surrounding development given that it provides an appropriate transition from the B3 Commercial Core zone down to the R4 High Density Residential and R2 Low Density residential zones in which it abuts on the eastern and southern boundaries. The proposal includes activate ground floor commercial / retail space while providing seniors housing of a style that will allow the local and wider community to age in place within close proximity to services and facilities.</p> <p>The proposed development will continue to maintain view sharing from surrounding development and is considered to maintain reasonable solar access to adjoining development. It will also mitigate acoustic and visual privacy through the inclusion of deep soil zones and privacy screens.</p> <p>Accordingly, the proposed development is considered to be suitable for the site considering its location adjoining residential zones and the transitional nature that it allows through different uses at ground level. Any environmental impacts associated with the proposed development are also considered to be mitigated through appropriate design measures.</p>	-
4.3 Built Form	The proposed development does not constitute a 'tower form'. This provision does not apply.	-
4.4 Separation	The proposed development does not constitute a 'tower form'. This provision does not apply.	-
4.5 Public Open Space	The proposed development does not constitute a 'tower form'. This provision does not apply.	-
4.6 Colonnades	The proposed development does not constitute a 'tower form'. This provision does not apply.	-
<b>C3 Residential Flat Buildings</b>		
3.2 Density	The site has an area of 2,140m <sup>2</sup> . The proposed development complies.	-



3.3. Building Depth	The building depth is 36.152m. While this exceeds the maximum building depth of 18m, the proposed development is commensurate to surrounding development, and generally allows for appropriate amenity within apartments. Further discussion is provided in <b>Section 5.5</b> .	-
3.4 Building Width	The maximum overall width of the building is approximately 21.6m. The proposed development complies.	-
3.5.1 Front Setbacks	The front setback to Greenwich Road is 5m. This reflects the setbacks of adjoining developments and complies with the minimum setback required in provision 1.1.6. The setback includes a plaza area with deep soil zone and bicycle parking, soft landscaping and pedestrian / vehicular entrances to the site.	<b>Section 5.4.2</b>
3.5.2 Side and Rear Setbacks	The proposed development adopts a 9m setback to the east and south where it adjoins land zoned R4 High Density Residential and R2 Low Density Residential. The proposed development complies.	<b>Section 5.4.2</b>
3.5.3 General	To the northern boundary, the proposal generally adopts a 7m setback. While the boundary line indents in the north eastern corner, the building still remains setback from the adjoining commercial building due to the driveway along the northern boundary. Notwithstanding, the proposal will also include privacy screens and deep soil zones to allow for appropriate residential amenity. Further discussion is provided in <b>Section 5.4.1</b> .	<b>Section 5.4.2</b>
3.6 Building Separation (within developments)	The proposed development has adopted separation distances and setbacks relative to the surrounding built form and size of the site, it has also taken into consideration the right of way which includes the driveway along the northern boundary. Accordingly, while the proposal results in a minor non compliances on the upper levels of the northern, southern and eastern setbacks the internal orientation of apartments as well as the inclusion of privacy screens is considered appropriate in the context of the site's locality and the surrounding development.	<b>Section 5.5.4</b>
3.9 Design of Roof Top Areas	The rooftop of the proposed development has been designed for use as a recreation space and informal outdoor dining space. The Architectural Plans and Landscape Plans (refer to <b>Appendix A</b> and <b>Appendix D</b> ) detail the rooftop plan design.  Further, private courtyards and balconies have been designed with the inclusion of planting and privacy screens to address visual and acoustic privacy, safety, security and wind.	<b>Appendix A</b> <b>Appendix D</b>
3.10 Size and Mix of Dwellings	The proposed development is for seniors housing. The size of apartments of all apartments complies with the ADG requirements. A SEPP 65 assessment has been prepared by Marchese Partners and is included at <b>Appendix C</b> .	<b>Appendix C</b>
3.11 Private open space (balconies and terraces)	Each apartment has access to a private courtyard or balcony. All courtyards on the ground floor are 45m <sup>2</sup> to 200m <sup>2</sup> .	-
3.12 Ceiling Heights	The Lower Ground level adopts a 3.1m floor to ceiling height and the Ground Level adopts a 3.5m floor to ceiling height. Level 1 to Level 5 adopt a 3.1m floor to ceiling height and Level 6 adopts a 2.7m floor to ceiling height. The proposed development complies.	-
3.13 Storage	The proposed development includes storage within apartments, as well as storage cages within the Basement Level car park. These storage cages are 5.8m <sup>3</sup> . While the provision of storage results in a minor non-compliance, this is considered appropriate due to the development being for seniors people only and not families.	-
3.14 Solar Access	The proposed development will result in 57.5% of apartments receiving the required level of solar access. While this results in a minor non-compliance, it is considered appropriate given the context of the development, where the proposal optimises views outward towards Sydney Harbour and the local district.  Regarding energy efficiency, NatHERS modelling has been undertaken by Cundall and is included in <b>Appendix L</b> . Shadow diagrams have been prepared by Marchese Partners and are included in <b>Appendix A</b> .	<b>Section 5.5.2</b>

3.15 Natural Ventilation	The proposed development has been designed to optimise natural ventilation. Accordingly, 68% of apartments will achieve the natural ventilation requirements. The proposed development complies.	<b>Section 5.5.3</b>
3.16 Visual Privacy	The proposed development has incorporated setbacks, deep soil and privacy screens to increase visual privacy without compromising access to light and air. The orientation of apartments facing east, south and west also assists in providing appropriate privacy from the commercial building to the north.	<b>Section 5.5.4</b>
3.17 Communal Open Space	The proposal includes a 90.3m <sup>2</sup> residents' terrace on the Ground Level as well as an accessible rooftop garden with lap pool, yoga space and dining area. The proposed development complies.	-
3.18 Landscaped Area	Landscaping has been incorporated into the development to provide privacy and amenity for residents. The proposal includes 1,778m <sup>2</sup> (83% of the site) area for landscaping, with 320m <sup>2</sup> (15%) being provided as a deep soil zone.	<b>Appendix D</b>

#### Part Q – Waste Management and Minimisation

3.1 Demolition of Buildings or Structures	The appointed principal contractor will prepare a detailed Waste Management Plan (WMP) for the development. The WMP will address the relevant legislation, avoidance of waste through design / construction techniques, recycling, protection of workforce / public, estimated volumes and method of disposal.	-
3.2 Construction of Buildings or Structures	The appointed principal contractor will prepare a detailed Waste Management Plan (WMP) for the development. The WMP will address the relevant legislation, avoidance of waste through design / construction techniques, recycling, protection of workforce / public, estimated volumes and method of disposal.	-
4.3 Residential Flat Buildings	Dedicated waste management rooms and facilities have been incorporated within the proposed development in accordance with the sizing requirements specified for residential flat buildings. The waste facilities include dedicated bins as well as garbage chutes on each level. The detailed quantum and operations of waste management is provided in the Operational Waste Management Plan at <b>Appendix I</b> .	<b>Section 5.8</b>
4.4 Commercial Developments	All retail tenants will be provided with access to a waste room containing 240L MGBs for the collection of waste and recycling. A private contractor will be engaged to collect the retail waste and recycling to an agreed schedule. The waste collection will enter the site from Greenwich Road and park in the designated loading bay on Basement Level 1. The waste collection staff will collect the bins from the retail was room. Further discussion is provided in the Operational Waste Management Plan at <b>Appendix I</b> .	

#### Part R – Traffic, Transport and Parking

2.4 State Environmental Planning Policy (SEPP) parking rates	The proposed car parking has been designed in accordance with the Seniors SEPP parking rates. Provision 2.4 of the Lane Cove DCP notes that the SEPP parking rates override Council's DCP parking rates.	<b>Section 5.6</b>
6.1 Traffic Impact Assessment	A Traffic Impact Assessment has been prepared by Varga Traffic Planning and is included at <b>Appendix E</b> .	<b>Section 5.6</b>
R.7 Construction Traffic Management Plan	A Construction Traffic Management Plan has been prepared by Stevens Construction and is included at <b>Appendix P</b> .	<b>Section 5.6</b>

## 5.4 Key Issues

### 5.4.1 Building Height

#### Statutory Context

The Height of Buildings development standard under clause 4.3 in the LCLEP 2009 is 25m.

For the purposes of development pursuant to the Seniors SEPP, height in relation to a building, means “the distance measured vertically from any point on the ceiling of the topmost floor of the building to the ground level immediately below that point”.

Clause 50 of the Seniors SEPP, provides that a consent authority must not refuse consent to a development application made pursuant to that Chapter for the carrying out of development for the purpose of a self-contained dwelling on building height: if all proposed buildings are 8 metres or less in height (and regardless of any other standard specified by another environmental planning instrument limiting development to 2 storeys).

As LCLEP 2009 imposes a height control and height definition that is different to those under the Seniors SEPP, there is an inconsistency between the two policies, and the Seniors SEPP prevails by virtue of cl 5(3) of the Seniors SEPP, which provides that:

*If this Policy is inconsistent with any other environmental planning instrument, made before or after this Policy, this Policy prevails to the extent of the inconsistency.*

The proposed development generally complies with the maximum building height control of 25m as specified in the LCLEP 2009. However, there is a minor 0.3m noncompliance in the south western corner of the building as a result of the site's topography (see **Figure 27** and **Figure 28**). It is noted that under the Seniors SEPP definition, the plant room and lift overruns do not form part of the ceiling of the topmost floor and are therefore excluded from the calculation of height.

Therefore, despite exceeding the maximum building height control of 25m, in this instance the development standards in the LCLEP 2009 do not represent a statutory standard that require a clause 4.6 variation request. We note that the standards in clause 50 do not preclude the granting of development consent, but rather if the standards are breached then the proposal would require a merit assessment under section 4.15 of the EP&A Act. This is consistent with the approach taken by *Eastern Suburbs Leagues Club Pty v Waverley Council* [2019] NSWLEC 130, Moore J (in Class 1)<sup>1</sup>.

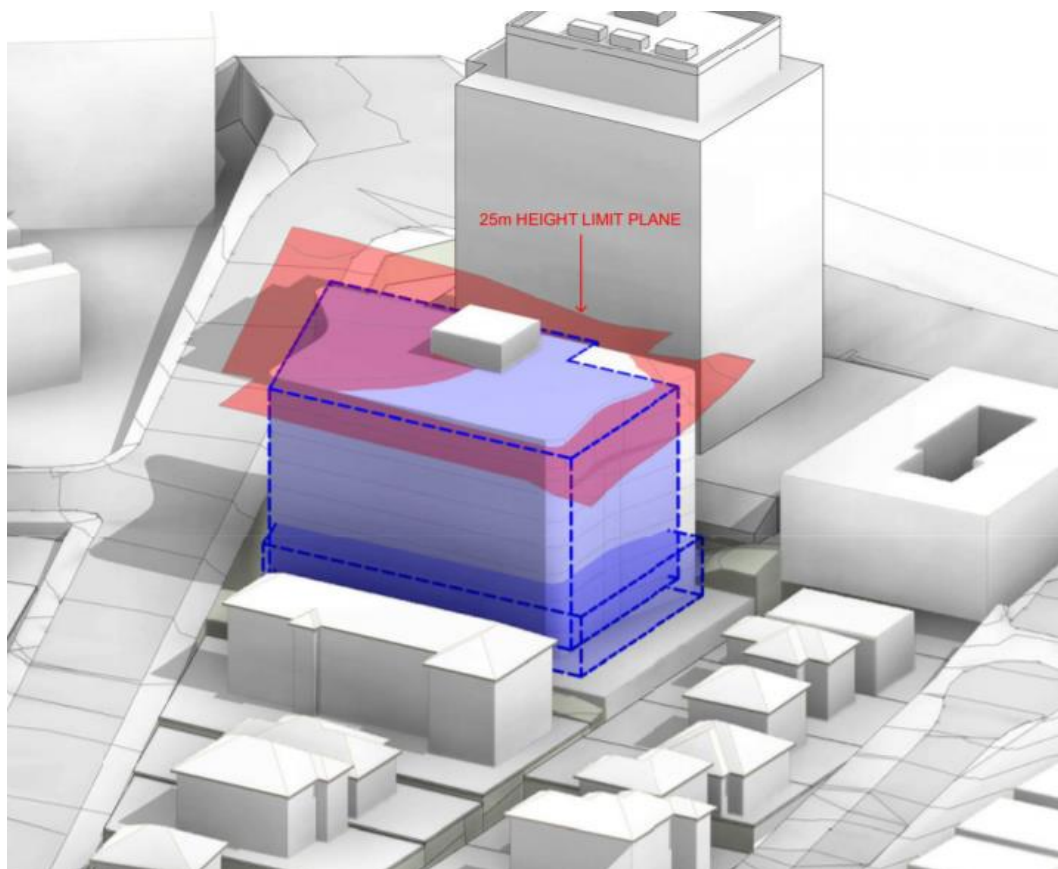
#### Proposed Variation

As shown in **Figure 26** below, the proposal only results in a minor 0.3m(1.2%) exceedance to the maximum building height control. The exceedance is a result of the steep slope along Greenwich Road from north to south and does not directly result in any additional GFA or floor space for habitable purposes, noting the proposal is under both the Seniors SEPP and LCLEP FSR controls.

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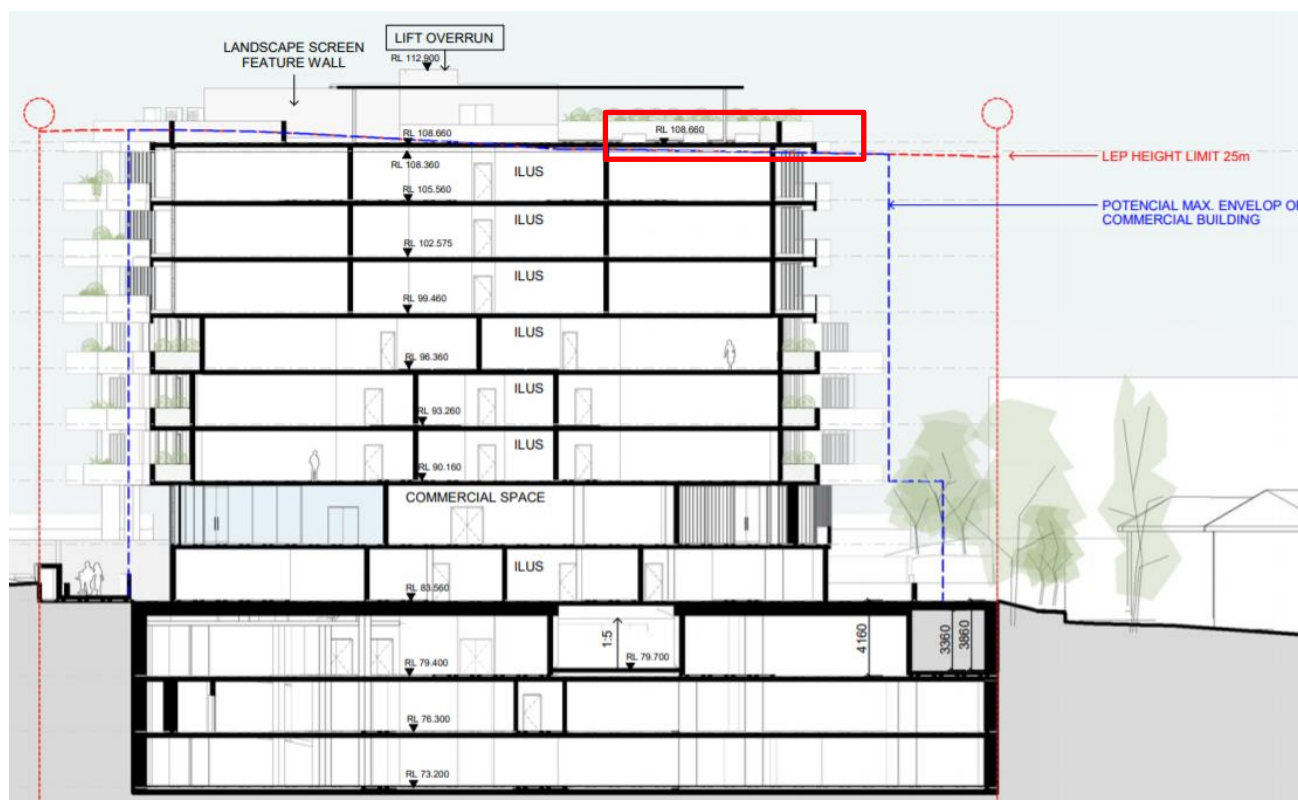
<sup>1</sup> Legal advice relating to the application of maximum building height development standards has been obtained from HWL Ebsworth lawyers





**Figure 27** LCLEP 2009 height compliance diagram

Source: *Marchese Partners*



**Figure 28** Section illustrating where the topmost habitable ceiling exceeds the 25m height limit

Source: *Marchese Partners*

## Merit Assessment

While the height control prescribed in the LCLEP 2009 cannot be taken as the jurisdictional bar for development consent or refusal, in accordance with section 4.15 of the EP&A Act, we have assessed the proposed height on its merit with specific regards to the LEP standard and its objectives.

The site is located at the interface between the significant scale of 154 Pacific Highway to the north (approximately 46m), and the much lower (approximately 12m) scale of 4 Greenwich Road and 1-5 Anglo Road, which also sit lower to 154 Pacific Highway as a result of the natural topography of the ridge line. The 25m height control in the LEP reflects the desire to create a transition between the significant change in height between the existing buildings and the topography.

By proposing a building that effectively reflects the scale of a 25m building, despite a minor variation, the development will achieve the intent of the 25m control to create an appropriate transition from the scale of 154 Pacific Highway down to the lower density zones it abuts on the southern and eastern boundaries.

The objectives for the maximum height of buildings under clause 4.3 of the LCLEP 2009 prescribe that:

- (a) *To ensure development allows for reasonable solar access to existing buildings and public areas,*
- (b) *To ensure that privacy and visual impacts of development on neighbouring properties, particularly where zones meet are reasonable,*
- (c) *To seek alternative design solutions in order to maximise the potential sunlight from the public domain,*
- (d) *To relate development to topography.*

The proposal, and in particular the proposed exceedance, does not result in any overshadowing of public areas other than the road reserve. An assessment of the proposed developments impacts on existing buildings is provided at Section 5.5.1. The assessment demonstrates that whilst there are shadow impacts, they are largely commensurate with that of a compliant 25m office building on the site.

As highlighted in **Figure 27** and **Figure 28**, as a result of the proposed seniors living use, which incorporates greater building setbacks and privacy measures than a commercial building, the proposed height will have less visual impact and improved privacy than a compliant commercial scheme. These impacts are further mitigated through the proposal's specific design and landscape strategy.

As discussed previously, the 25m height limit in the LEP reflects the desire to transition the scale of development with the topography down from the Pacific Highway ridgeline. The proposal achieves the objective of relating development to the topography by generally complying with the 25m standard.

It is also noted that the current Planning Proposal for the site, which has received a Gateway determination seeks to amend the height to 33m, reflecting that a building taller than that proposed would be an appropriate scale in this location.

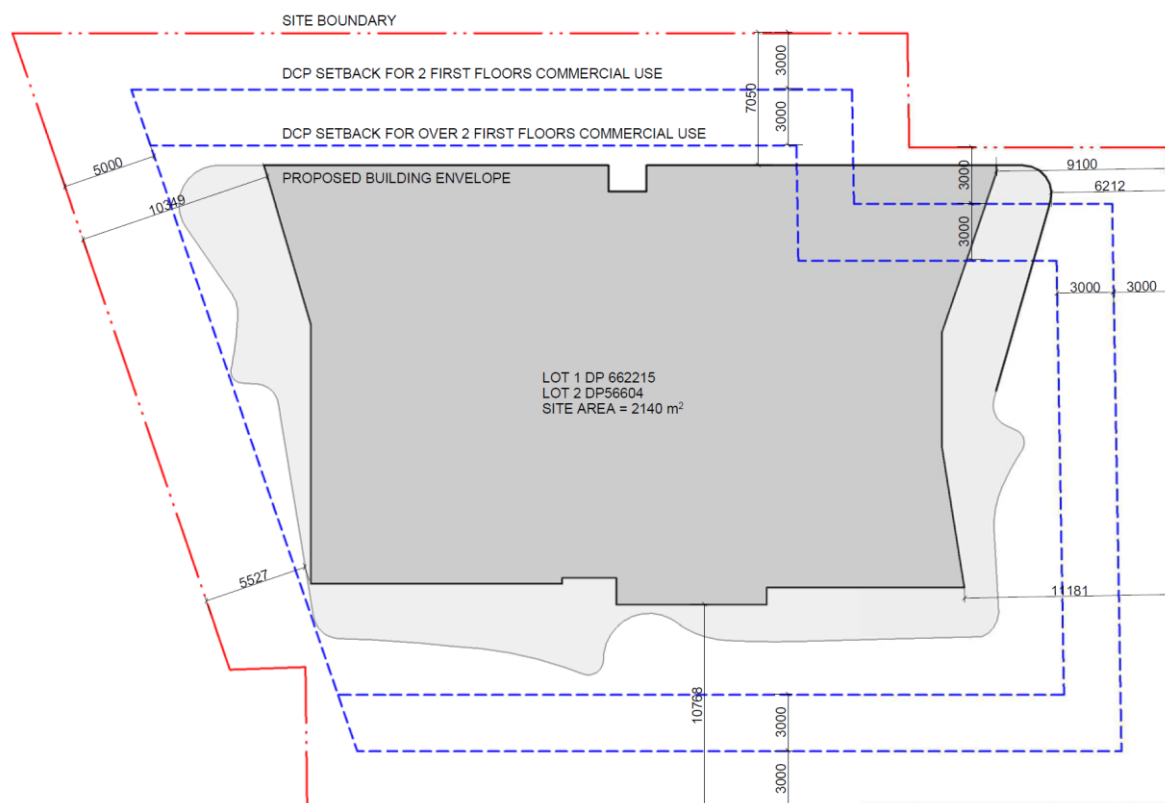
Accordingly, the proposed height is considered appropriate as it reflects the general scale of that envisaged under the LEP, which creates a transition with the surrounding development and meets the objectives of the control.

### 5.4.2 Built Form and Setbacks

As discussed above in relation to height, the proposed built form has been formulated in response to the site's context, underlying planning controls, and the desire to optimise the amenity for the adjoining properties and future residents.

The bulk and scale of the proposed development is generally commensurate to, or less than that of a compliant commercial building that could be approved under the existing LCLEP 2009 development standards (see **Figure 29**). The massing is therefore reflective of what could otherwise be anticipated to occur on the site, despite the underlying controls not anticipating a seniors housing use.

The proposed development adopts a curvature form through articulation of deep balconies and setbacks that respond to the adjoining development. The use of curves and varied materiality ensures diversity within the streetscape and contributes significantly to breaking up the building massing, while presenting a development that provides significant improvements from that which currently exists.



**Figure 29 Proposed building setbacks compared to a compliant Commercial Building**

Source: *Marchese Partners*

The proposed development has established setbacks that respond to the existing land uses on neighbouring properties, in particular the residential development, while recognising site constraints including the Right of Way along the northern boundary (refer to **Section 2.3**). Building separation with the adjoining properties is considered in **Section 5.5.4**.

On Greenwich Road, the proposal adopts a variable setback that ranges between 5m-7.5 (see **Figure 30**) which is consistent with / exceeds the minimum DCP control for commercial development. A contextual analysis of Greenwich Road highlights that there is no established setback character to the road, and that the oblique angle of the road results in a wide range of design responses. The existing Northside Clinic is setback approximately 5m from the boundary. The development to the north at 154 Pacific Highway has a less than 5m setback for its podium but a much larger setback for the significant tower form. At 4 Greenwich Road the apartments are setback between 5-9m. The design, responds to the changing condition and alignments of the adjacent buildings by adopting the variable setback which splays the building out at each of its corners but pulling back at the middle to reduce its bulk and add articulation and visual interest.

Source: *Marchese Partners*

As discussed previously, the Seniors SEPP prevails over an LEP to the extent of any inconsistency. Notwithstanding, the proposed development complies with the FSR controls prescribed by the LCLEP 2009, with a maximum FSR of 3:1. Accordingly, the proposed development will have a positive impact on the streetscape and is considered to provide an appropriate built form in the context of the surrounding development.



## 5.5 Amenity

### 5.5.1 Overshadowing

Overshadowing analysis has been undertaken by Marchese Partners and is included at **Appendix A** to demonstrate the potential impact of the proposed development on adjoining properties. The overshadowing analysis includes models of the resulting shadow cast by the proposed development, the existing commercial tower to the north, maximum shadow cast by the envelope of a commercial building on the site, and the existing shadow cast by the building.

As demonstrated on the shadow diagrams, the future built form on the site would result in a marginal exceedance to the shadow cast by the maximum envelope of a commercial building under the LCLEP 2009 controls during the morning to early afternoon period. Beyond this, the commercial building would result in additional shadow cast on properties located on the eastern side of Anglo Road at 3pm. Notwithstanding this, the shadow cast by the proposed development largely falls on the Greenwich Road road reserve or is generally within the shadow cast by the existing commercial tower towards the north of the site during the morning period. During the midday to early afternoon period, the shadow cast is largely similar to that cast by a compliant commercial building, however, there is a minor exceedance where the shadow from the proposed development falls on the property at 11 Anglo Road.

While portions of the shadow cast by the proposed development fall outside that of a compliant commercial building under the LCLEP 2009 controls, the impact of this is considered negligible when looking at the portions of additional shadow cast and the broader public benefits associated with the development. As shown in **Figure 31** below, the shadow cast reflects the form that would otherwise be cast from a commercial building with minor areas falling outside of this due to the built form and massing.





**Figure 31** Overshadowing study

Source: *Marchese Partners*

### 5.5.2 Solar Access

ADG design criteria 4A-1 Solar Access, requires that living rooms and private open spaces of at least 70% of apartments in a building receive a minimum of 2 hours direct sunlight between 9am and 3pm at midwinter. The ADG also includes Design Guidance which states: "Achieving the design criteria may not be possible on some sites. This includes: ...where significant views are oriented away from the desired aspect for direct sunlight".

Having considered the surrounding context, which includes a large commercial building to the north, and highly value views (see **Figure 32**) to the south east and south west the apartments have been orientated to the south to maximise their views rather to the north. This results in only 57.5% of apartments receive the required solar access, however, consistent with the Design Guidance in the ADG, the exceptional residential amenity achieved by the views is considered of higher value than prioritising the achievement of solar access.



**Figure 32 Views to the South East and South West taken from Level 4 of the existing building**

Source: *Ethos Urban*

As shown in **Figure 33** below, the apartments that do not receive the required level of solar access are all located in the south eastern portion of the building. This means that these apartments will be afforded an optimal outlook to the surrounding district, while achieving cross ventilation and other forms of internal amenity. For the apartments located on the Lower Ground Level, they are provided with large private open space and landscaping to ensure residents have large spaces which receives solar access and an outlook to achieve residential amenity.

Accordingly, while the proposed development results in 57.5% of apartments achieving the required level of solar access, the configuration and design has allowed for the development of oversize apartments with an outlook towards significant landmarks and district views.





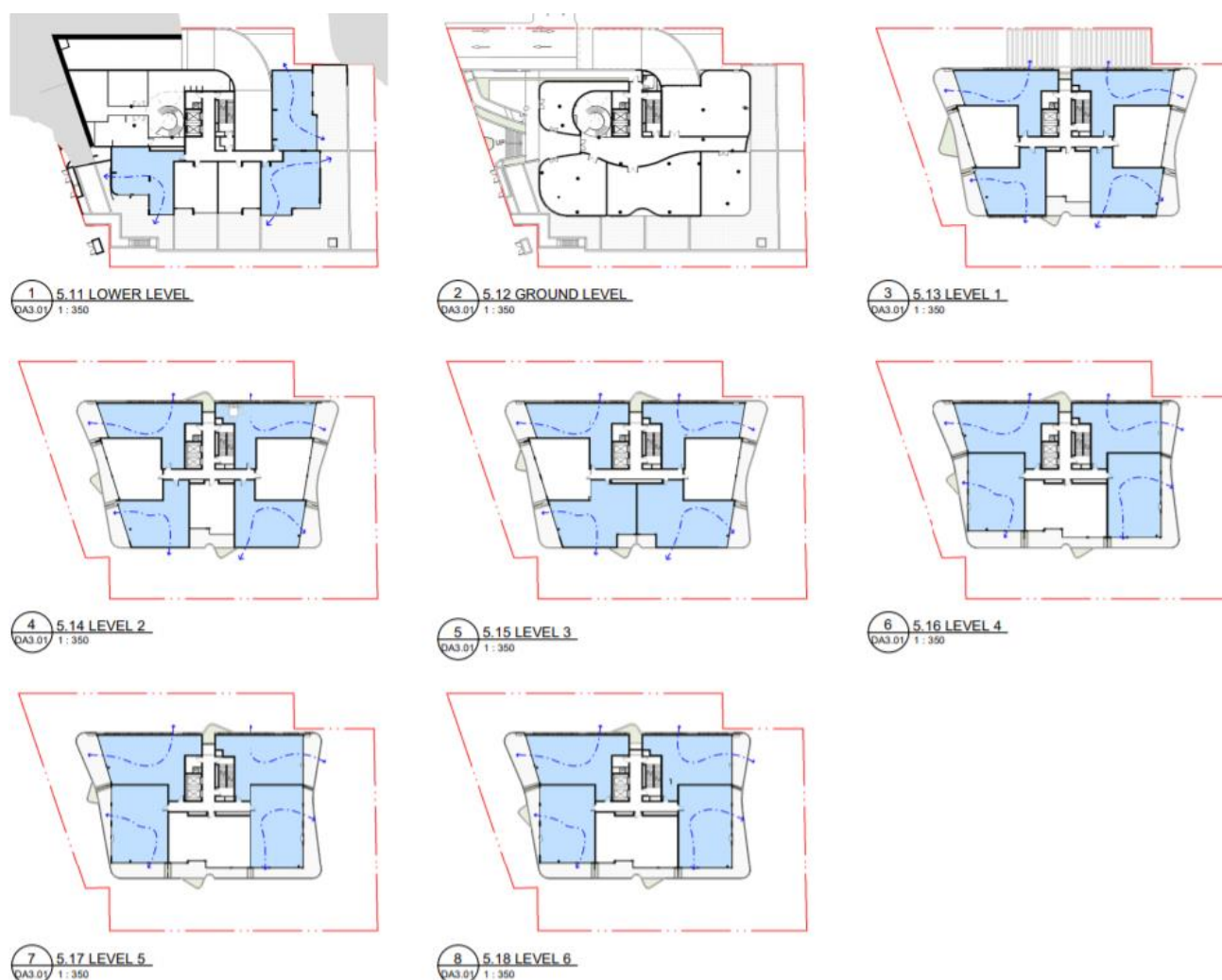
**Figure 33** Solar access study (apartments receiving required solar access shown orange)

Source: *Marchese Partners*

### 5.5.3 Cross Ventilation

ADG design criteria 4B-3 Ventilation requires that at least 60% of apartments are capable of providing natural cross ventilation in the first 9 storeys of the building. As shown in **Appendix A**, the proposed massing and configuration of apartments allows for appropriate cross ventilation. As illustrated in **Figure 34** below, 68% of all apartments are naturally cross ventilated and therefore the proposed development complies.





**Figure 34** Cross ventilation (apartments achieving cross ventilation shown blue)

Source: Marchese Partners

### 5.5.4 Building Separation

ADG design criteria 2F Building Separation applies to the privacy separation distance from the boundary of a development site to a balcony or window.

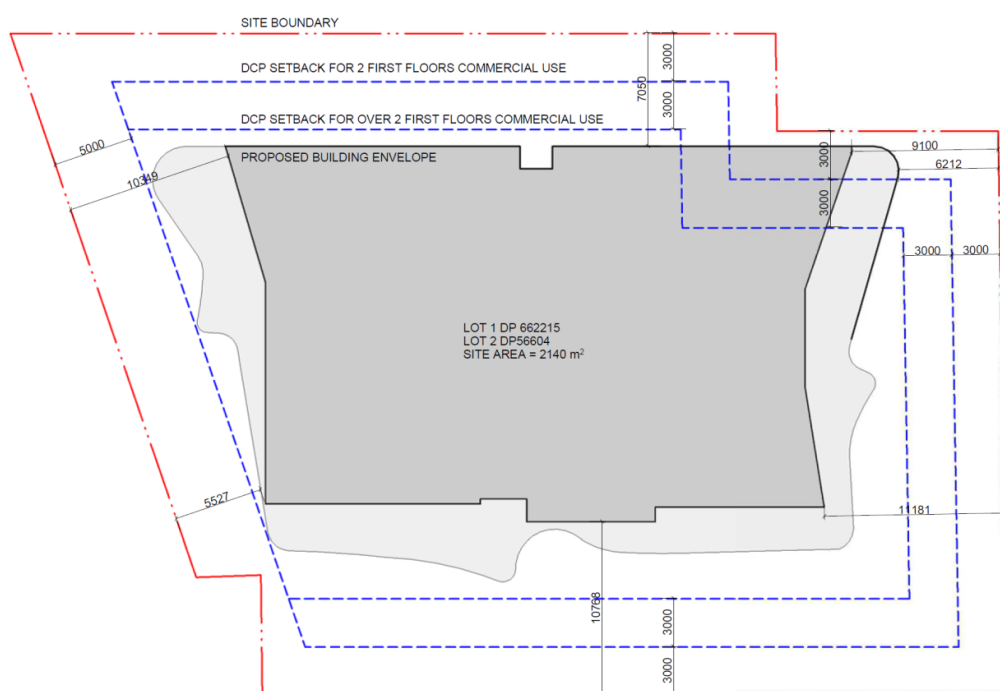
The proposed development has adopted separation distances and setbacks relative to the surrounding built form and size of the site, it has also taken into consideration the right of way which includes the driveway along the northern boundary. Accordingly, the setbacks in **Table 10** and **Figure 35** from neighbouring properties have been adopted.

**Table 10** ADG Building Separation assessment

Boundary	Up to Level 4			5 Storeys and above		
	ADG Requirement	Minimum Proposed	Compliance	ADG Requirement	Minimum Proposed	Compliance
North <sup>a</sup>	4.5m (screened)	7.05m	✓	6m (screened)	7.05m	✓
South	6m	9m	✓	9m	9m <sup>b</sup>	✓
East	9m (6m + 3m due to zone interface)	6.2m	✗	9m	9m	✓

<sup>a</sup> excludes the area where the boundary kinks for the access right of way on 145 Pacific Highway

<sup>b</sup> excludes landscape planters on façade which provide additional screening



**Figure 35 Proposed building setbacks**

Source: *Marchese Partners*

As highlighted in **Table 10**, the variation to the ADG proposed relates to the eastern boundary on Levels 4 and below, where the setback ranges between 6.2m (adjacent 1 Anglo Road) before expanding to 9.2m (adjacent to 3 Anglo Road). The required separation would typically be 6m at this height, however the ADG states that an additional 3m building setback should be provided at the interface with low density residential zones.

Notwithstanding this, due to its existing relationship immediately adjacent to 145 Pacific Highway and the existing Northside Clinic (which has a similar setback), 1 Anglo Road has been developed to turn its back on the site, being built out to the extent of the block and largely comprising blank facades with one small habitable window on the upper level (see **Figure 36**). Therefore the potential impact on this dwelling both in terms of visual impact and its privacy are limited and the proposed separation is considered acceptable.

The setback then extends to the required 9m at the lower levels adjacent to 3 Anglo Road (which is owned by Phiroan Pty Ltd) and no part of the building is adjacent to 5 Angelo Road.

In addition to the proposed building separation, the development includes two large deep soil zones along the southern and eastern boundaries where the development interfaces with adjoining residential uses. The landscape strategy combined with these deep soil areas will allow for significant vegetation to grow between the proposed development and the existing residential uses.



**Figure 36** Adjoining residential development at 1 Anglo Road (left) and 3 Anglo Road (right)

Source: Ethos Urban

### 5.5.5 Views

The proposed development is not considered to have an adverse impact on any local and regional views from surrounding development. As the proposed development is located on a steep slope, the maximum building height responds to the topographical changes and the surrounding context. Given that the proposed development is located on the northern end of Greenwich Road, the proposal will not result in any significant view loss from residential development however, may result in some view loss the existing commercial development along the Pacific Highway. While the proposal largely remains within the maximum building height as prescribed under the LCLEP 2009, it does result in an increase in height from that which currently exists. This means that the commercial building located at 154 Pacific Highway, will experience some view loss up to Level 8 (approximately). Notwithstanding, given the existing height the commercial development will still be afforded panoramic views towards the south from the upper levels and any view loss will be contained within a small area of these expansive panoramic views.

Further, while the proposal will be most notable when viewed from the south along Greenwich Road, it is considered that it provides an appropriate transition in built form, while contributing high quality architectural design. Given the low lying nature of existing residential development and topographical changes, the proposal will not result in any significant view loss from residential development. Therefore, due to the location of the site it is likely to have a negligible impact in terms of view loss to residential development.

## 5.6 Traffic and Parking

A Traffic and Parking Assessment has been prepared by Varga Traffic Planning and is included at **Appendix E**. The assessment details the potential traffic and transport implications associated with the redevelopment of the site.

### 5.6.1 Traffic Generation

Traffic generation rates from the proposed development has been assessed with regard to the Roads and Maritime Services, *Guide to Traffic Generation Developments – Section 3: Landuse Traffic Generation* and the updated traffic generation rates in the RMS *Technical Direction (TDT 2013/04a)*. The RMS Guidelines are based on extensive surveys undertaken on a wide range of land uses and nominates the following traffic generation rates which are applicable to the proposed development:

- Housing for Seniors – 0.4 peak hour vehicle trips per dwelling; and
- Commercial premises – 2.0 peak hour vehicle trips per 100m<sup>2</sup> GFA.

It is noted that the RMS Guidelines do not nominate a traffic generation rate for small, local cafes or galleries / libraries. Therefore, in this instance the rate for commercial premises has been adopted. We note that the community facilities on the Lower Ground floor are for residents access only and therefore have no bearing on the traffic generation and / or total car parking requirements. Accordingly, the projected future traffic generation potential is shown in **Table 11** below.

**Table 11 Projected future traffic generation potential - development**

Land use	Total traffic generation
40 x Independent living units	16 peak hour vehicle trips
Commercial uses (458m <sup>2</sup> )	9.2 peak hour vehicle trips
<b>Total traffic generation potential:</b>	<b>25.2 peak hour vehicle trips</b>

Source: Varga Traffic Planning

Comparatively, the RMS Guidelines for the previous use of the site being a private hospital adopts the following traffic generation rates (where B equates to the number of beds):

- MVT (morning peak) =  $-12.41 + 0.57B$ ; and
- EVT (evening peak) =  $-11.96 + 0.69B$ .

Application of the above traffic generation rates for the former private hospital with a capacity of 92 beds, would yield approximately 40 vehicles per hour during the morning peak period and 52 vehicles per hour during the evening peak period.

As such, the proposed development comprising 40 ILUs and commercial areas will generate less traffic than the former private hospital by nearly half. Accordingly, Varga confirm the proposed development will not result in any unacceptable traffic implications in terms of road network capacity to the surrounding street network. Further discussion is provided in **Appendix E**.

### 5.6.2 Parking

The car parking requirements for the proposed development are specified in the Seniors SEPP as follows:

- 0.5 car spaces for each bedroom where the DA is made by a person other than a social housing provider, or
- 1 car space for each 5 dwellings where the DA is made by, or is made by a person jointly with, a social housing provider.

It is noted that the Seniors SEPP does not nominate any off-street parking rates for visitors and therefore the off-street parking rate of 1 space per 4 dwellings as specified in the LCDCP 2010 has been adopted. The off-street parking rate applicable to the commercial / retail components of the proposed development is also specified in the LCDCP 2010 as follows:

- Office / business premises – 1 space per 60m<sup>2</sup> GFA plus 1 disabled space per 10 cars (min. 1 disabled space); and



- Café / retail – 1 space per 40m<sup>2</sup> GFA plus 1 disabled space per 20 cars (min. 1 disabled space).

However, the LCDCP 2010 does not nominate an off-street parking rate for galleries / libraries, as such the above rates for retail / café land uses has been adopted.

Application of the above rates to the various components of the proposed development would yield approximately 70 off street car parking spaces. However, the proposal makes provision for a total of 76 off-street parking spaces including disabled spaces, which more than offsets the requirements specified in the Seniors SEPP and LCDCP 2010. While the proposal results in more off-street car parking than otherwise required under the relevant statutory plans and policies, Varga confirm that this will not result in any impact on the surrounding road network capacity or any appreciable increases in delays. The proposed car parking breakdown is provided in **Table 12** below and further discussion is provided in **Appendix E**.

**Table 12 Proposed basement car parking**

Land use component	Number
<b>Basement 1</b>	
Commercial / retail	8
Commercial / retail disabled	1
Seniors spaces	7
Visitors disabled	3
<b>Basement 2</b>	
Seniors Spaces	22
Visitors	5
Visitors disabled	1
<b>Basement 3</b>	
Seniors spaces	22
Visitors	5
Visitors disabled	2
<b>TOTAL</b>	<b>76</b>

Source: Varga Traffic Planning

### 5.6.3 Vehicular Access

The proposed development will provide car parking within 3 basement levels. The vehicular access arrangements have been designed to accommodate the turning swept path requirements of B99 vehicles as specified in AS2890.1. This will allow vehicles to circulate internal ramps without difficulty and to enter and exit the site in a forward direction. A series of swept analysis have also been conducted for the B85 vehicle which shows cars accessing a sample of parking spaces without difficulty.

As noted in the Traffic and Parking Assessment, the vehicular access ramp and manoeuvring area has been designed to accommodate the swept turn path requirements of trucks, allowing them to enter and exit the site in a forward direction.

## 5.7 Noise

An Acoustic Assessment has been prepared by Acoustic Logic and is included at **Appendix G**. The report assesses the potential noise impacts associated with the proposed development, including traffic noise impacts from Greenwich Road and noise emissions from the mechanical plant servicing the development. The report has been prepared with regard to the Lane Cove DCP, Australian Standards and the NSW EPA - *Noise Policy for Industry (NPII) 2017*.

Acoustic Logic have identified the nearest noise sensitive receivers (refer to **Figure 37**), including:

- Receiver 1 – commercial building located at 154 Pacific Highway, Greenwich;

- Receiver 2 – commercial building located at 130-134 Pacific Highway;
- Receiver 3 – residential dwellings located at 1, 3, and 5 Anglo Road, Greenwich;
- Receiver 4 – residential dwellings located at 4 Greenwich Road, Greenwich;
- Receiver 5 – residential dwellings located at 49 Bellevue Avenue, Greenwich; and
- Receiver 6 – residential dwellings located at 7 Greenwich Road, Greenwich.



**Figure 37 Acoustic monitoring locations**

Source: Acoustic Logic

The external noise assessment indicated that the major external noise source around the project site is traffic noise from Greenwich Road. The external noise levels were assessed using the  $65\text{dB(A)}_{\text{Leq(15 hour)}}$  during the daytime period and  $59\text{dB(A)}_{\text{Leq(9 hour)}}$  during the night time period. The calculations were undertaken considering the orientation of windows, screens and total area of glazing. Accordingly, with regard to the relevant standards Acoustic Logic have recommended various glazing systems, external wall construction techniques and entry doors to ensure internal amenity for all residents.

Further, Acoustic Logic have undertaken a review of mechanical plant equipment that will be used on the site. While detailed plant selection has not yet been undertaken, Acoustic Logic confirm that satisfactory acoustic levels will be achieved through appropriate plant selection and location, and the inclusion of duct lining, acoustic silencers and enclosures will allow for internal and external acoustic amenity.

Accordingly, Acoustic Logic confirm that the proposed development is capable of complying with the relevant acoustic controls as prescribed by the Lane Cove DCP, Australian Standards and the NSW EPA - *Noise Policy for Industry NPFI 2017*. Further discussion is provided in **Appendix G**.

## 5.8 Operational Waste Management

An Operational Waste Management Plan (OWMP) has been prepared by Elephants Foot and is included at **Appendix I**. The OWMP assesses the proposed waste management services with regard to the LCDCP 2010 and the relevant Australian Standards.

### Residential component

Elephants Foot have assessed the estimated volume of garbage and recycling waste generated by the residential component of the development as shown in **Table 13** and **Table 14** below.

**Table 13 Residential component – calculated waste generation rate**

Collection generation rate	Generated garbage (L/week)
Garbage Bin Size (L)	240
Garbage Bins per week	13.33
Garbage Collections per week	1
Total garbage bins required	14
<b>Total residential generation (L/week)</b>	<b>3,200</b>

Source: Elephants Foot

**Table 14 Residential component – co-mingled / paper product recycling generation**

Level	Recycling Generation Rate (L/unit/week)	Generated Co-mingled recycling bins per week	Total co-mingled recycling bins required
Lower ground	24	120	1
Ground	24	0	1
Level 1	24	168	1
Level 2	24	168	1
Level 3	24	144	1
Level 4	24	120	1
Level 5	24	120	1
Level 6	23	120	1
<b>Total residential generation (L/week)</b>			<b>960</b>
<b>Total collections per week</b>			<b>1</b>

Source: Elephants Foot

During the operation of the proposed development, the building manager will monitor the number of bins required for the residential component. Waste collection will be undertaken from within Basement Level 1 using Council's waste contractor and their mini garbage truck, which is similar in size to a standard SRV truck. Swept path analysis has been undertaken by Varga Traffic Planning to confirm that trucks accessing the site can do so in a forward direction.

One garbage chute will be installed with access provided on all residential levels. The residents will be responsible for walking their waste and recycling to the disposal point and placing waste down the chute and recycling into appropriate bins. The garbage chute will discharge into 240L MGBs placed on a carousel. The building manager will be responsible for monitoring the fullness of the bins on the carousel and rotating with empty bins as required.

### Retail / Commercial Component

**Table 15** below illustrates the estimated volumes of garbage and recycling generated by the retail component of the development, with a 7-day operating week assumed. The retail tenancies will share the waste storage room in Basement Level 1.

**Table 15** Calculated waste and recycling generation – retail tenancies

Type	Garbage generation rate (L/week)	Recycling generation rate (L/week)
Café	2927.46	592.51
Commercial (office)	102.48	102.48
Wellness centre	498.05	498.05
Gallery/Library	76.16	76.16
<b>TOTAL</b>	<b>3604.15</b>	<b>1269.20</b>

Source: *Elephants Foot*

The retail tenant will be provided with a retail waste room containing 240L MGBs for the collection of waste and recycling. Tenants will be responsible for their own storage of garbage and recycling during daily operations. On completion, nominated staff or cleaners will transport their garbage and recycling to the retail waste room located on basement Level 1. Accordingly, the waste generation for the retail / commercial component will require 3 x 660L waste bins and 1 x 660L recycling bin to be collected twice per week.

A private contractor will be engaged to collect the retail waste and recycling to an agreed schedule. The waste collection vehicle will enter the site from Greenwich Road and parking in the designated loading bay on Basement Level 1. The waste collection staff will collect the bins directly from the retail waste room. Access to Basement Level 1 and the loading bay has been assessed by Varga Traffic Planning. The assessment confirms the swept paths are suitable and vehicles can enter and exit the site in a forward direction.

## 5.9 Other Impacts of the Development

An assessment of the other impacts of the development have been undertaken by the relevant specialist consultants and are appended to this SEE as set out in **Table 16** below.

**Table 16** Summary of other technical assessments

Consideration	Consultant	Summary	Reference
Tree Removal	Horticultural Management Services	Horticultural Management Services have prepared a Arboricultural Impact Assessment for the proposed development. The proposal will require the removal of 13 trees due to their location within the proximity to the proposed works. While the trees assessed are in good health, they are required to be removed based on the building's configuration. Horticultural Management Services determine that these trees are suitable for removal and there are no tree / vegetation issues that would arise from the proposed development that would otherwise require a modification to the proposal.	<b>Appendix F</b>
Geotechnical	JC Geotechnics	The Geotechnical Report has assessed the subsurface profile and geotechnical conditions with the proposed development area. JC Geotechnics tested the subsurface conditions using borehole logs, and encountered asphaltic concrete, fill material, residual soil and weathered shale bedrock. Groundwater was not encountered in any of the borehole logs. JC Geotechnics have provided a number of recommendations in accordance with the relevant codes of practice and standards to be undertaken during the construction and demolition phases.	<b>Appendix J</b>
Construction Traffic Management	Varga Traffic Planning and Stevens Construction	Varga Traffic Planning and Stevens Construction have assessed the proposed construction activities on the site and traffic arrangements. As identified in the report, the construction works will be undertaken in four stages with the total approximate duration of works being 2 years, commencing in 2021 with completion anticipated to be early 2023. The CTMP establishes the works to be undertaken in each stage, access points and loading zones as well as	<b>Appendix E, Appendix P</b>



Consideration	Consultant	Summary	Reference
		<p>management measures to be established to protect the amenity of pedestrians, cyclists, residents and construction workers.</p> <p>The CTMP also establishes construction activities and associated measures necessary to facilitate the works on the site. The CTMP considers that:</p> <ul style="list-style-type: none"> <li>• Management measures would be established to ensure the safety for motorists, pedestrians and cyclists and amenity for residents;</li> <li>• If required, traffic controllers would be used to control vehicles and assist pedestrians during the works;</li> <li>• Traffic control for any pedestrian diversions or traffic controllers would be prepared in accordance with Australian Standards and RMS Guidelines.</li> </ul> <p>The CTMP concludes that the proposed measures would adequately address potential implications associated with the construction activities.</p>	
Contamination	Trace Environmental	<p>Trace Environmental have prepared a Preliminary Site Investigation (PSI). The PSI finds that no historical contaminating activities have been identified at the site which may have resulted in potential site contamination, except for possibly imported fill of unknown sources used as part of the construction of the current building and landscaping areas. Based on these observations, Trace Environmental consider that the site is able to be made suitable for the proposed development subject to the following being undertaken prior to construction:</p> <ul style="list-style-type: none"> <li>• A Hazardous Buildings Materials Survey and Detailed Site Investigation will be undertaken prior to demolition of the existing structure;</li> <li>• The chemical containers located in the basement car park should be properly disposed of at a facility licensed to receive this waste;</li> <li>• Excess soil that is generated during construction that is surplus to site development requirements must be classified in accordance with the NSW EPA and disposed of accordingly; and</li> <li>• Any imported material brought onto the site for any purpose must be validated as being suitable for the intended land use.</li> </ul>	<b>Appendix K</b>
Civil and Stormwater Arrangements	BG&E	<p>BG&amp;E have prepared a Civil Report to address the proposed OSD tank and the gross pollutant trap requirements. The OSD tank flows will be piped to the new pit and pipe network within the proposed drainage easement before discharging to Anglo Road. Hydrological modelling has also been undertaken using DRAINS software to estimate rainfall-runoff and flow for the existing scenario and development scenario and are in accordance with the Lane Cove DCP part O: Stormwater. BG&amp;E confirm that the proposed civil engineering addresses the concerns raised by Council and the requirements of the Lane Cove DCP.</p>	<b>Appendix H</b>
Infrastructure Services	Lakiss & Associates Consulting Engineers	<p>The Infrastructures Services Report confirms that based on initial investigations, the water, gas, electricity, communication and sewer infrastructure has adequate capacity to service the proposed development subject to final approval from the relevant authorities and service providers.</p>	<b>Appendix R</b>
Sustainability	Cundall	<p>A Sustainability Report has been prepared by Cundall. The Report addresses the relevant standards required</p>	<b>Appendix L, Appendix M</b>

Consideration	Consultant	Summary	Reference
		to be achieved for energy, water and thermal comfort. Cundall confirms that the proposed development will meet or exceed the BASIX minimum compliance requirements having an energy score of 25% reduction in greenhouse gas emissions, greater than 40% saving in potable water consumption and achieve better than the 6-star average HERS Star rating across the project.	
BCA	BCA Logic	BCA Logic confirm that the proposed architectural design has been assessed against the relevant provisions of the Building Code of Australia and it is considered that the development complies or is capable of complying with the Code.	<b>Appendix N</b>
Access Report	BCA Logic	BCA Logic confirm that the proposed architectural design has been assessed against the relevant provision of accessibility and complies or is capable of complying with the standards.	<b>Appendix O</b>
Crime Prevention through Environmental Design	-	The built form has been designed to ensure a large number of apartments and entries to the building face the street and have an outlook to the surrounding public domain to ensure an appropriate level of passive surveillance. The use of a secure and lockable entry system to the building and each individual apartment will offer residents the opportunity to see who approaches their dwelling without the need to open their door. Further, through the inclusion of active ground floor uses including a café and library / gallery fronting Greenwich Road, this will provide an active street frontage and further passive surveillance.	-

## 5.10 Social and Economic Impacts

The proposed development will provide much needed additional aged care to meet the needs of seniors housing in the locality. Specifically, the proposal will:

- Provide for much needed self contained seniors housing in a location close to services and facilities;
- Help meet the strategic need for additional housing diversity including the provision of seniors housing in an accessible location;
- Provide onsite communal open space to enable social interaction amongst residents;
- Increase the provision of community services and connections to the community; and
- Provide additional jobs during both the construction and operational phases of the proposed development.

## 5.11 Site Suitability and Public Interest

The proposed development is considered suitable for the site and in the public interest as:

- The site can appropriately accommodate the proposed development while balancing environmental and design consideration and preserving the amenity of neighbouring properties;
- It will cater for the ageing population and provide capacity for existing residents in the Lane Cove LGA to age in place and provide an increased supply and diversity of housing that meets the needs of seniors;
- It will provide a built form that has been architecturally designed commensurate with the surrounding environment;
- The architectural design will deliver a high quality building, which will support safe and secure aged living environment; and
- The site be adequately managed to ensure no impact to surrounding properties.

## 6.0 Conclusion

The proposed development seeks approval for an 8 storey seniors housing development comprising 40 independent living units, commercial / retail floor space on the ground level as well as an accessible rooftop. The proposed development has a number of significant benefits, specifically it will support ageing in place allowing members of the local and wider community access to aged care in a highly accessible location. The proposal also delivers a high quality architectural design that integrates with the local area and contributes to the public domain and urban design of Greenwich Road.

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:

- is generally consistent with the aims and objectives of the Seniors SEPP and other relevant State Environmental Planning Policies as well as the LCLEP 2009 and LCDCP 2010;
- will increase supply of seniors housing commensurate to forecasted demand within the LGA and improve the quality of seniors housing stock available within the LGA;
- is carefully designed to provide a contextual response to the site setting and minimise bulk and scale impacts to adjoining properties;
- provides a quality architectural design that will contribute to a safe and active environment;
- includes supporting technical studies which confirm that the environmental impacts associated with the proposal are generally positive and will not give rise to any adverse impacts; and
- is suitable for the site and is in the public interest.

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.