

#### Certification

This Section 4.6 Request has been prepared to address the requirements of the Environmental Planning and Assessment Act, its Regulations and current NSW Land and Environment Court interpretations of this provision.

This Request is prepared in good faith to accurately describe the proposed development, its context and statement of environmental effects can be relied on.

Philip Bull

BA (Syd.) MUP (Melb.) Dip Mgt (AIM) MPIA

Principal, Civic Assessments

Date: 26/01/2022

#### **Documents Control**

Rev	Description	DATE	AUTHOR	CHECKED
Α	Reviewed	16/09/1967	PSB	PSB
В	Amend	26/01/2022	PSB	PSB

# Civic Assessments Urban Planners

Philip Bull BA (Syd) MUP (Melb) PIA 0405 535 097 philip.bull@civicassessments.com www.civicassessments.com

ABN 48680779849

### working with

5/32 Lonsdale Street, Braddon 2612 Phone Office (02) 6262 5091 or Mobile 0411 425 797 canberratownplanning.com.au

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#### **A**TTACHMENTS

1) SUMMARY ARCHITECTURAL PLANS PREPARED BY AMC ARCHITECTURE

CLAUSE 4.6 REQUEST – BUILDING HEIGHT
7 - 13 BELLEVUE ROAD AND 2 BENNEY AVENUE FIG TREE

PREPARED BY CAPITAL REGION PLANNING

### 1. INTRODUCTION

We write on behalf of ADRIA CARE LTD to provide a Clause 4.6 Requests to vary the building height control in the State Environmental Planning Policy Housing 2021 (the Housing SEPP) addressing the planning considerations under the Environmental Planning and Assessment Act 1979 (the Act).

This Clause 4.6 is lodged in respect to a Development Application (DA) for a Seniors Housing development at 7 - 13 Bellevue Road, 2 Benney Avenue and 38 - 40 Princess Highway Fig Tree (the site).

The site has an area of 13,577.4sqm and currently accommodates a place of public worship (the Croatian Catholic Church), together with associated facilities (community hall, offices, function rooms, car parking, etc). Part of the property also contains 2 residential dwellings houses. Other parts of the site include recreation spaces for users of the church and community centre.

The site is situated adjacent to the Figtree commercial area centre on the corner of Bellevue Road and the Princess Highway. See location plan below.



Figure 1: Locality Plan, Sixmaps.

The proposal is for:

- a 4 to 3 storey Residential Care Facility (RCF) comprising 102 beds;
- a 4 to 3 storey Independent Living Units (ILUs) building comprising 22 units;
- retention of the existing Croatian Catholic Church and community hall; and
- a new community plaza, ancillary parking and facilities such as a gym, wellness centre seniors' day care centre, men's shed and café.

This Clause 4.6 Request should be read in conjunction with the Statement of Environmental Effects for the proposal prepared by Capital Region Planning.

See imagery of the proposal below and summary plans attached (full archtecural plans provided with DA).



Figure 2: Site Plan, AMC Architecture

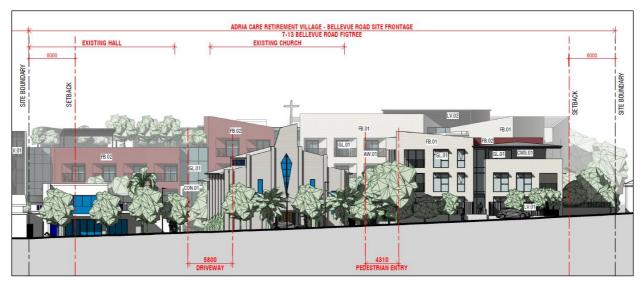


Figure 3: Proposed Buildings to Bellevue Road, Plan, AMC Architecture

### 2. The Control and the Building Height Sought

The proposal is lodged under the Housing SEPP and as such the building height provisions of the Wollongong Local Environmental Plan 2009 (the LEP) are subservient to those in the SEPP.

Pursuant to clause 4.3(2), provided below, of the LEP a 9m local building height control applies to the site.

"4.3 (2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map."

An extract from the building heigh map is provided below.



Figure 4: Extract Building Height Map, the LEP.

The local height control is superseded by the provision of the Housing SEPP, see clause 8 of the SEPP that provides (our *emphasis* added):

"8 Relationship with other environmental planning instruments

Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency."

In terms of maximum permissible building height, clause 87 of the Housing SEPP provides for the following provision (our *emphasis* added).

"87 Additional floor space ratios

- (1) This section applies to development for the purposes of seniors housing on land to which this Part applies if—
  - (a) development for the purposes of a residential flat building or shop top housing is permitted on the land under another environmental planning instrument, or
  - (b) the development is carried out on land in Zone B3 Commercial Core.
- (2) Development consent may be granted for development to which this section applies if—
  - (a) the site area of the development is at least 1,500m2, and
  - (b) the development will result in a building with the maximum permissible floor space ratio plus—

- (i) for development involving independent living units—an additional 15% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units, or
- (ii) for development involving a residential care facility—an additional 20% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of the residential care facility,

or

- (iii) for development involving independent living units and residential care facilities—an additional 25% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units or a residential care facility, or both, and
- (c) the development will result in a building with a height of **not more than 3.8m above the maximum permissible building height.**"

The site is zoned R2 Low Density and residential flat buildings are permissible. The maximum permissible building height under the LEP is 9m.

In this instance the building height control for the site is 9m + 3.8m = 12.8m under the provisions of clause 87 (c) of the Housing SEPP.

The Housing SEPP also provides for non-discretionary building height provision of 11.5m for Seniors Housing. A Non-discretionary development standard facilitates development and is not a maximum permissible building height control.

The maximum permissible building height control of 12.8m prevails over the non-discretionary development standard of 11.5m in this instance and therefore a Clause 4.6 Request is provided to the clause 87 (c) 12.8m building height control.

In this instance, the non-compliance with the 12.8m building height control concerns the new Residential Care Facility and Independent Living Units buildings.

The maximum non-compliances for each building are described in the table below.

Maximum Building Height								
Independent Living Unit Building								
	NGL	RL	Building Height (m)					
Street Facade	18.45	26.3	7.85m					
Street Facade upper step	17.24	29.84	12.60m					
Lift overrun rear	16.58	29.525	12.95m					
Rear Parapet	14.98	29.906	14.93m					
Main Parapet			12-14m					
Residential Care Facility								
North West cnr Façade	16.07	31.81	15.74m					
Lift Overrun	15.29	32.675	17.39m					
Main Parapet			12-14m					

The proposal provides for variations to the 12.8m building height control of up to 1.13m (17%) for the Independent Living building and 4.59m (36%) for the Residential Care Facility.

See summary elevation plans provided overleaf and attached plans.

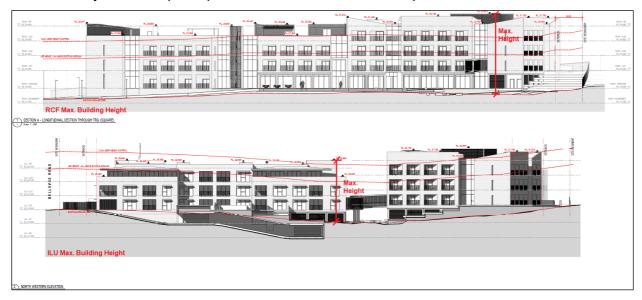


Figure 5: Maximum Building Height, AMC Architecture

### 3. The Clause 4.6 Tests

In *Initial Action Pty Ltd v Woollahra Municipal Council* [2018] NSWLEC 118, the Land and Environment Court clarified that the consent authority must form two positive opinions of satisfaction under clause 4.6(4)(a).

The first opinion of satisfaction required by clause 4.6(4)(a)(i) is that the written request must adequately address the matters required to be demonstrated by cl 4.6(3) as follows:

- that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case (see section 4.1 below); and
- that there are sufficient environmental planning grounds to justify contravention of the development standard (see section 4.2 below).

The second opinion of satisfaction required by clause 4.6(4)(a)(ii) is that the proposed development will be in the public interest because it is consistent with the objectives of the development standard that is contravened and the zone objectives.

These matters are outlined in further detail below.

## 4. Clause 4.6 Variation Request – Height

The relevant matters to consider under Clause 4.6 of the LEP are addressed below.

## 4.1 Clause 4.6 (3) (a): that compliance with the development standard is unreasonable or unnecessary in the circumstances of the case

The objectives of the building height control (Clause 4.3) are:

- "4.3 Height of buildings
- (1) The objectives of this clause are as follows—
  - (a) to establish the maximum height limit in which buildings can be designed and floor space can be achieved,
  - (b) to permit building heights that encourage high quality urban form,
  - (c) to ensure buildings and public areas continue to have views of the sky and receive exposure to sunlight.

The augmented building height control of 12.8m under clause 87 of the Housing SEPP does not have objectives and references the LEP control. Therefore, the LEP building height control objectives are assessed.

Objective (a) seeks an optimal relationship between site building height and floor space. In this instance the site's floor space control is a Non-Discretionary control of 0.87:1 that is a facilitative provision, and its purpose is to set a maximum for a particular attribute of a development whereby that scheme cannot be refused on that issue if it complies. It is not a limiting control and, in this instance, a density above the Non-Discretionary FSR control of 0.87:1 does not require a clause 4.6 Request process but rather a merit assessment of site floor space (density). In this instance a floor space just above the control of 0.9:1 is proposed.

All additional floor space is for the purpose of Seniors Housing. The new buildings have a 4-storey scale and 6m+ setbacks to all boundaries with adjoining properties.

Looking specifically to impacts on adjoining properties, and with reference to the submitted shadow diagrams (see DA-0-910 attached **Appendix 1**), we note the following:

- Any overshadowing impacts of adjoining residences are limited to the Winter Solstice between 9am and 10am ensuring a minimum of 5 hours of uncompromised solar access;
- Any overshadowing impacts of the adjoining residence garden areas are limited in the Winter Solstice between 9 am – and approximately 1pm noting that each received more than 50% solar access between 11.30 and 3pm on what are substantial rear garden areas where the shadow quickly pulls away from the immediate residence area.

The development is well serviced with ancillary uses and has excess parking to that required. Much of the activity generated by the proposed site density will be serviced internally or via walking to adjoining commercial uses.

The distribution of floor space on the site is reasonable and facilitated by the building height sought.

The bulk and scale of the proposed building is also not unreasonable, as 2-3-storey buildings would be achievable under the 9m building height control for general development and the proposed 3-4-storeys buildings are consistent with the preferential approach in the Housing SEPP for Seniors Housing. An additional 1-2 storeys are not a dramatic or overbearing change in scale.

The proposal complies with objective (a).

In terms of objective (b), the proposal is for a comprehensive site redevelopment that has been through a master-planning process, detailed consultation with the officers of Wollongong Council and reviewed by Councill's Design Review Panel

The site is also adjoining and functionally part of the Figtree commercial centre where higher building forms are allowed and expected.

The building form has also been well informed by the client, the Croatian community. The new buildings are dramatic, well-articulated and varied in form and materials and seek to create an intimate European 'old-city' feel to this space.

These various interests have been documented by well-regarded architects and a high-quality urban form is provided.

The proposal satisfies objective (b).

In terms of objective (c), the proposal provides for minimum 6m setbacks from all site boundaries, separation between the 2 new building forms and a large public square behind the existing Croatian Church and Community Hall.

The Independent Living Building will address Bellevue Road and a street setback of 8.2m is provided. The existing Croatian Church and Community Hall will maintain their current open forecourt areas to Bellevue Road.

The new buildings have acceptable shadow impacts on neighbours and also importantly allows for continuous mid-winter sun to the new public square.

Public areas will continue to have views of the sky and receive exposure to sunlight; indeed, the proposal will provide for a significant up-grade of an under-used urban site.

The proposal satisfies objective (c).

The proposal is consistent with the objectives of the local building height control.

## 4.2 Clause 4.6 3 (b): that there are sufficient environmental planning grounds to justify contravening the development standard.

There are sufficient environmental planning grounds to justify contravening the development control because the proposal is consistent with and satisfies the objectives of the height of building control, the objectives of the zone (discussed below) and the circumstances of the site, which are an amalgamated site already used for mixed use purposes adjoining the Figtree commercial centre.

The additional building height is also largely for lift and parapet elements of the new buildings that are exclusively for Seniors Housing purposes.

The proposed Seniors Housing is responding to a demonstrable community need for appropriate housing for an aging population and in a suitable location.

The 3 to 4-storey scale of the proposed building is reasonable adjoining a commercial centre and on a large master-planned site with good internal and external building setbacks.

The shadows of these building are diffuse and do not unreasonably impact adjoining lower density residential land. The worst shadows are cast onto the site, its car parking area, and the commercial area to the south.

The proposal rationalises the current number of vehicular crossings on the site from 4 to 2 and provides for well-planned parking and loading areas within basements. Currently all parking is at-grade. The parking provision is compliant in terms of the relevant planning controls. The rationalisation of driveway crossing will provide more kerbside parking on Bellevue Road.

The proposed provides for a comprehensive landscape scheme and stormwater management. The existing drained water course will be included in site landscaping and naturalised to a degree.

The environmental impacts of the proposal are reasonable, and the proposal provides for a significant improvement on existing site conditions in terms of building presentation, public domain improvements, response to housing need and site facilities.

There are good planning justifications for the variations to the site's building heigh control sought.

## 4.3 Clause 4.6 (4) (a) (ii): the proposed development will be in the public interest

The proposal is consistent with the objectives of the building height standards as described previously.

The objectives of the R2 zone are as follows:

"Zone R2 Low Density Residential

- 1 Objectives of zone
- To provide for the housing needs of the community within a low density residential environment.
- To enable other land uses that provide facilities or services to meet the day to day needs of residents."

In terms of the first zone objectives, there is a demonstrable need for Seniors Housing on the State, Regional and Local level.

The purpose of the Housing SEPP is to recognise this need and promote actual Seniors Housing projects.

At the Wollongong LGA and Figtree local level the existing population is growing and aging.

The suburb of Figtree (see 2016 ABS locality) has an older population than the average for NSW and Australia and a high percentage (relatively) of its population is born in the former Yugoslav Republic of Macedonia. This housing and residential care project is responding to an existing community need.

Most notably though is the extreme mismatch of the current housing stock to this aging population. In general, an aging population requires smaller dwellings, whereas as of the 2016 census in the Figtree locality 3.8% of the housing stock comprised bedsit or one-bedroom dwellings whereas 20.4% of households were lone person households. Not all old people living alone want to live in a bedsit or 1 bedroom dwelling; however, many do want or need this type of accommodation for affordability and convenience reasons. Now there is limited housing stock in the Figtree locality to service this demand.

This mismatch would likely create underutilisation of existing housing stock or force elderly people that do want to downsize to move away from their community.

Project population and household growth for the Wollongong LGA is provided in the table below.

Projected Population to 2041								
	2016	2021	2026	2031	2036	2041	%	
							Change	
Wollongong (C)	210,394	222,745	234,689	246,602	257,443	265,769	26%	
NSW Total	7,732,85	8,414,978	9,011,010	9,560,567	10,077,964	10,572,696	37%	
	8							
Wollongong LGA Household Type Projections								
type	2016	2021	2026	2031	2036	2041		
Couple only	19,894	21,965	23,835	25,432	26,842	28,047	41%	

Projected Population to 2041								
	2016	2021	2026	2031	2036	2041	%	
							Change	
Couple with children	24,333	25,555	26,790	27,990	29,083	29,823	23%	
Single parent	9,544	10,074	10,573	11,176	11,794	12,242	28%	
Multiple and Other family households	2,418	2,561	2,684	2,809	2,920	3,000	24%	
Total family households	56,190	60,155	63,882	67,406	70,638	73,113	30%	
Lone person	21,072	22,851	24,629	26,465	28,338	29,929	42%	
Group	4,061	4,163	4,157	4,257	4,332	4,355	7%	
Total non-family households	25,133	27,014	28,786	30,721	32,670	34,284	36%	
Total households	81,323	87,168	92,668	98,127	103,308	107,396	32%	
Source:https://www.planning.nsw.gov.au/Research-and-Demography/Populationprojections/Projections								

The strongest area of household growth is in the lone person household to 2041 (42%) then couple only (41%). Given the current demographics of the Figtree locality with strong current populations in the 40-to-60-year cohorts, this will translate to strong demand for unit living for seniors into the future.

This observation is also well known to the Council as stated in their recent housing review, see summary of key issues concerning Seniors Housing provided below:

"The population of Wollongong LGA is ageing. The projected number of residents in Wollongong LGA aged 70 years plus is projected to increase from 25,586 in 2016 to 31,845 by 2026. In 2016, the Illawarra Aged Care Planning Region had a total of 5881 total operational aged care places consisting of mixture of low care, high care, home care, restorative care places. The ratio the Illawarra achieved in 2016 was 104.7 meaning the Illawarra region has a total of 104.7 places for every 1000 people aged 70 years plus. Assuming the current ratio of 104.7 places per 1000 people remains constant through to 2026, there will be a projected shortfall of 656 places in the Wollongong LGA alone, to achieve the Australian Government National target of 125 per 1000 persons."

Additional to the above current (2016) need identified by Council research, there is also a growing and aging population that will exacerbate this need.

This proposal is responding to existing and emerging demand for Seniors Housing in the Figtree locality and LGA from.

There is demonstrable need for the type of housing proposed. The proposal directory addresses the core objective of the R2 zone – housing need.

In terms of the second objective of the R2 zone, the housing proposed is also accompanied by an array of facilities or services to meet the day to day needs of residents, in particular the existing Croatian Church and community Hall is to be retained, a large public square is to be provided behind the existing church and Hall (where there is currently an at-grade car park), and around this square a café, wellness centre, Seniors Day Care, Men's Shed and community meeting rooms are to be provided – see plan of community uses below.

<sup>&</sup>lt;sup>1</sup> Wollongong City Council 2020 Draft Housing and Affordable Housing Options Paper, officer summary when reported to Council meeting 16 March 2020.

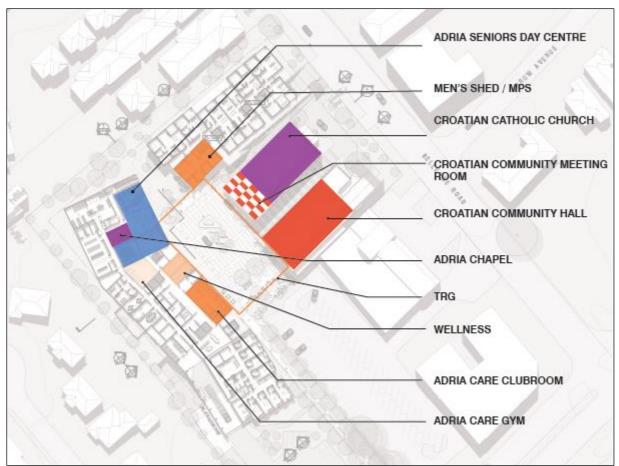


Figure 6: Community Uses Plan, AMC Architecture

The proposal will purposefully enable other land uses that provide facilities and services to meet the day to day needs of residents of this complex and the broader community.

The proposed development will become a community resource and is an ideal development in terms of the objectives of the R2 zone.

The proposal is consistent with the objectives of the R2 zone and in the public interest.

## 4.4 Clause 4.6 (4) (b): the concurrence of the Planning Secretary has been obtained.

It is assumed Council has delegation to consider the variation.

## 4.5 Clause 4.6 (5): In deciding whether to grant concurrence, the Planning Secretary must consider:

- (a) whether contravention of the development standard raises any matter of significance for State or regional environmental planning, and
- (b) the public benefit of maintaining the development standard, and
- (c) any other matters required to be taken into consideration by the Planning Secretary before granting concurrence.

In terms of the concurrence provisions of Clause 4.6, the non-compliance with the site's building height control raises no matters of significance for State or regional environmental planning.

There is no public benefit in maintaining this standard, as in this instance maintaining the standard would deny approval a regionally significant development that provides housing and

service that addresses vital community needs. It has also been demonstrated that the proposal is consistent with the building height and zone objectives. It therefore meets the public interest test within Clause 4.6.

There are no other matters relevant to the Secretary's concurrence in this instance.

#### 4.6 The 'Five Part Test'

In addition to the above requirements, Councils may choose to not only use the principles of Clause 4.6 but also the 'five-part test' established by the NSW Land and Environment Court.

Court cases dealing with applications to vary development standards resulted in the NSW Land and Environment Court setting out a five-part test for consent authorities to consider when assessing an application to vary a standard to determine whether the objection to the development standards is well founded. The 'five-part test' is outlined as follows: -

- "1. the objectives of the standard are achieved notwithstanding noncompliance with the standard:
- 2. the underlying objective or purpose of the standard is not relevant to the development and therefore compliance is unnecessary:
- 3. the underlying object or purpose would be defeated or thwarted if compliance was required and therefore compliance is unreasonable:
- 4. the development standard has been virtually abandoned or destroyed by the council's own actions in granting consents departing from the standard and hence compliance with the standard is unnecessary and unreasonable;
- 5. the compliance with development standard is unreasonable or inappropriate due to existing use of land and current environmental character of the particular parcel of land. That is, the particular parcel of land should not have been included in the zone."

In relation to point (1):-

The proposal meets the relevant objectives of the building height standard, as detailed previously. In relation to point (2):-

We would argue that this part of the test contradicts the first point in the test. We have outlined that the objectives of the standard are still met despite the alleged non-compliance with the standard. It would be unusual to find a situation where the underlying objective is not relevant to a development.

In relation to point (3):-

The proposal provides for a building height that is less than a storey above the applicable control for a building that addresses the core housing purpose of the R2 zone (need) and is consistent with the objectives of the building height control. The need that this proposal addresses (housing and facilities for an aging pollution) is also an acute need in this community and that need is growing.

It would be contrary to the standard to deny this variation.

In relation to point (4):-

Council maintains a register of variations granted and it routinely varies its building height control.<sup>2</sup>

 $<sup>{}^2\</sup>underline{\text{https://wollongong.nsw.gov.au/your-council/access-to-information/information-registers/variation-to-development-application}$ 

Most recent examples are:

- 1. DA-2021/705 a 1.7% variation to the building height control was granted for construction of community facility at 32 Foley Street GWYNNEVILLE.
- 2. DA-2021/238 a 18.94% variation to the 9m height control (9.805m approved) for a house at 105 Yallah Road YALLAH.
- 3. DA-2020/1458 a 12.25% variation to the 16m building height control (17.96m high building approved) for a residential flat building at 6 Dudley Street WOLLONGONG.
- 4. DA-2021/252 a 9.7% variation to the building height control for a house at 10 Sturt Place **BULLI**

These are the latest building height variations approved by Council.

Looking through Council's register, larger variations have been supported such as a 31% variation for DA-2019/96 for a hotel development and, directly relevant to this DA, is DA-2018/557 where a 34.7% variation was granted for a residential aged care facility at 4 Lindsay Evans Place DAPTO in a an R2 zone.

This request is consistent with how Wollongong Council administers clause 4.6.

In relation to point (5):-

The Applicant does not rely on this point as our view is the building and form of development proposed is appropriate to the site's R2 Low Density zone.

#### 4.7 Four2Five Pty Ltd v Ashfield Council decision

This clause 4.6 Request is prepared cognisant and in accordance with recent Court decisions on the proper consideration of such requests as outlined in the Four2Five Ptv Ltd v Ashfield Council decision and its recent judicial review (see [2015] NSWLEC 90). In this case the Court considered that the justification under clause 4.6(3) (b) required 'particular reference to the circumstances of the proposed development'. In practice, this means a request needs a sitespecific justification.

In this instance, the site-specific justification is that the site is an amalgamated site adjoining the Fig Tree commercial centre. The site is already largely used for commercial purposes and the existing subdivision pattern of this site (larger lots than the adjoining residential subdivision) suggests a type of usage and pattern of development different to that on adjoining R2 land.

The proposal provides for a Residential Care Facility and Independent Living Units and a variety of ancillary uses. A public square is provided and comprehensive landscape treatment to the site that will partly naturalise an existing drained watercourse.

When reviewed against current demographic need, the proposal is an ideal development for its R2 zone.

dherence to the bond housing outcome	 control would	unreasonably	hinder these	good	urban	design

### 5. Conclusion

The objectives of clause 4.6 in the LEP are:

- "4.6 Exceptions to development standards
- (1) The objectives of this clause are as follows—
  - (a) to provide an appropriate degree of flexibility in applying certain development standards to particular development,
  - (b) to achieve better outcomes for and from development by allowing flexibility in particular circumstances.."

The proposal is a good development for a Clause 4.6 Request in a general sense as the purpose of the housing sought is to address a demonstratable need for Seniors Housing. If that need is not met there will be various adverse impacts. Development responding to demonstrable housing needs warrant flexibility in terms how planning controls are administered.

The site has a maximum building height control under the Housing SEPP or 12.8m.

The new buildings are for the purpose of a Residential Care Facility and Independent Living dwellings. The non-compliances with the building height control are generally concerning lift cores, roofs and parapets to each building. In both cases the new buildings have a 4-storey scale and general building is generally compliant with the 12.8m building height control.

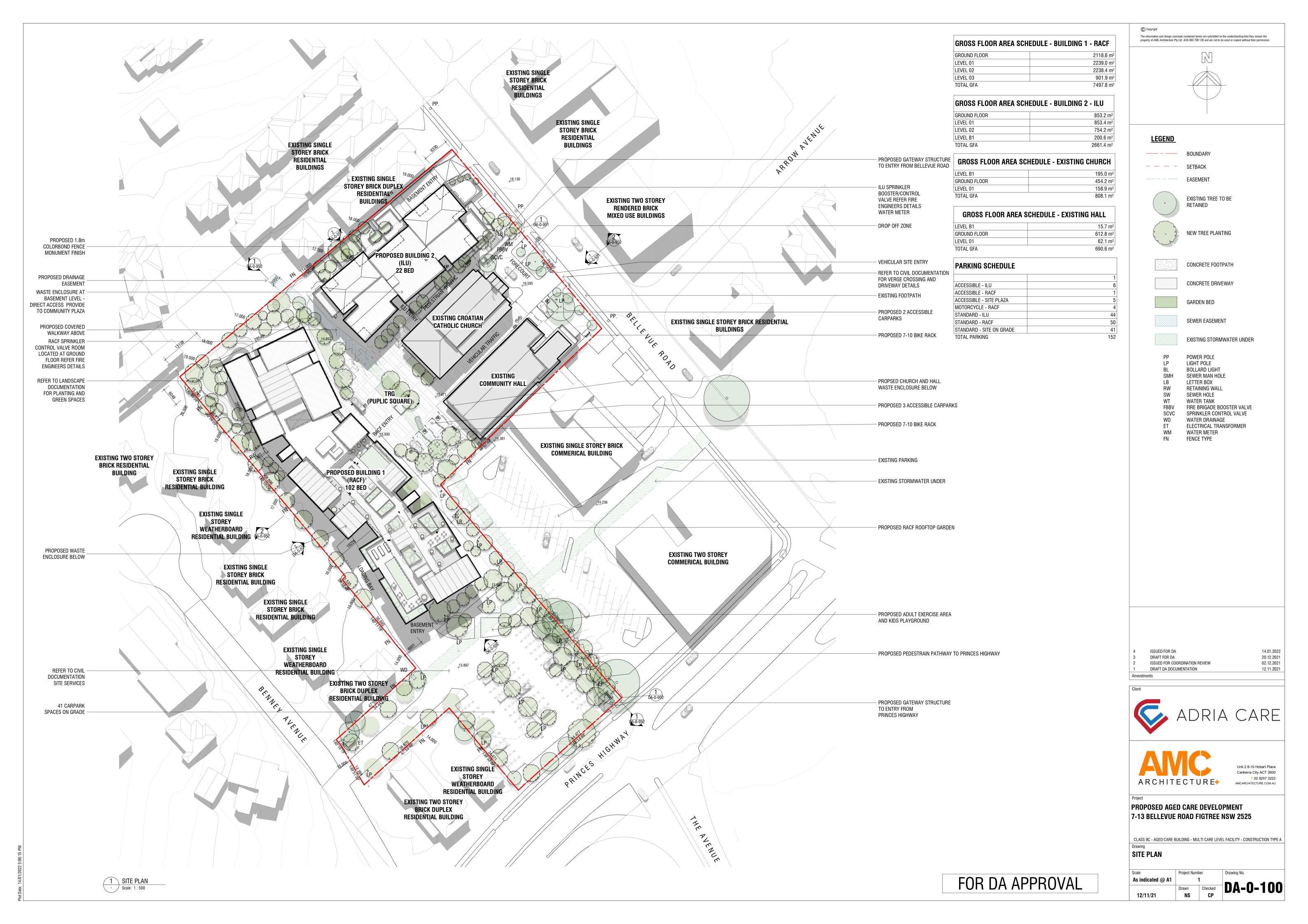
The new buildings are all setback a minimum of 6m from boundaries and has acceptable impacts on neighbours and substantially improves the amenity of the site.

There are no environmental planning grounds to justify seeking compliance with the building height control in this instance,

The proposed buildings are consistent with the objectives of the building height control and R2 zoning. There are good planning justifications to support these buildings as compliance with the control is unreasonable or unnecessary in the circumstances of the case.

Having regard to the above, it can be concluded that compliance with the building height control for this site are unreasonable and unnecessary in the circumstances of the case, and that there are sufficient environmental planning grounds to justify the non-compliances. The proposal is also in the public interest. It is consistent with the objectives of the standards as well as the objectives of the zone. A high-quality planning outcome is facilitated by approval of this Clause 4.6 Request.

**Attached** – Summary architectural plans.





3D VIEW - AERIAL VIEW BELLEVUE ROAD
Scale: 1:1



3D VIEW - AERIAL VIEW PRINCES HIGHWAY

- Scale: 1:1

ADRIA CARE

ISSUED FOR DA DRAFT FOR DA DRAFT DA DOCUMENTATION

PROPOSED AGED CARE DEVELOPMENT

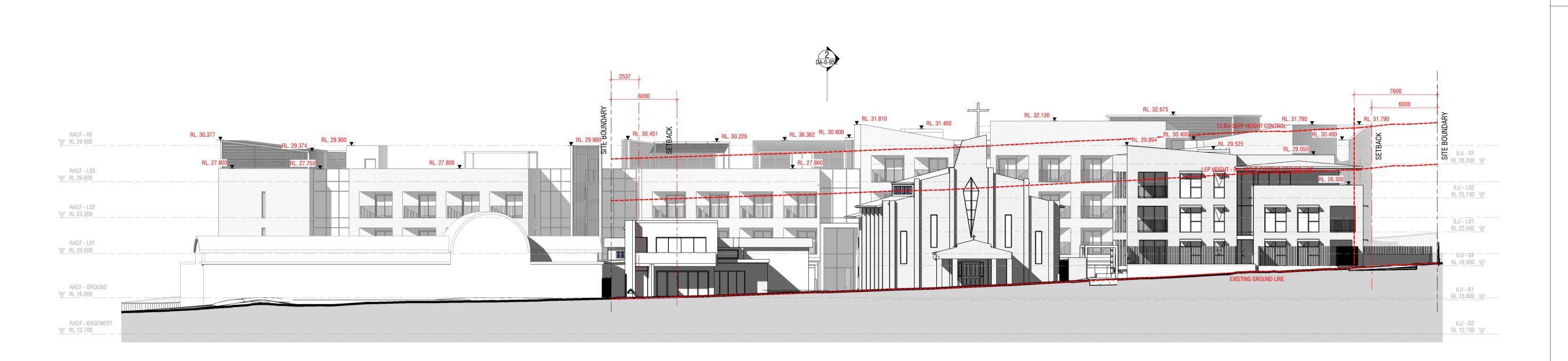
CLASS 9C - AGED CARE BUILDING - MULTI CARE LEVEL FACILITY - CONSTRUCTION TYPE A

14.01.2022 20.12.2021 12.11.2021

The information and design concepts contained herein are submitted on the understanding that they remain the property of AMC Architecture Pty Ltd ACN 092 706 128 and are not to be used or copied without their permission.

7-13 BELLEVUE ROAD FIGTREE NSW 2525

Drawing
3D PERSPECTIVES



NORTH EASTERN ELEVATION
- Scale: 1:200



NORTH WESTERN ELEVATION
Scale: 1:200

FOR DA APPROVAL

ISSUED FOR DA DRAFT FOR DA 14.01.2022 20.12.2021 12.11.2021 DRAFT DA DOCUMENTATION Unit 2 8-10 Hobart Place Canberra City ACT 2600 T 02 6257 3222 AMCARCHITECTURE.COM.AU PROPOSED AGED CARE DEVELOPMENT 7-13 BELLEVUE ROAD FIGTREE NSW 2525 CLASS 9C - AGED CARE BUILDING - MULTI CARE LEVEL FACILITY - CONSTRUCTION TYPE A **BUILDING HEIGHTS (ELEVATIONS)** 1 : 200 @ A1

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