

Our Ref: 16229

29 October 2020

The Secretary
NSW Department of Planning and Environment
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SYDNEY NSW 2000

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ATTENTION: Mr Jim Betts

Dear Mr Betts,

RE: APPLICATION FOR SITE COMPATIBILITY CERTIFICATE FOR PROPOSED NEW SENIORS HOUSING DEVELOPMENT AT NO. 266 LONGUEVILLE ROAD, LANE COVE

This Supporting Statement for the third Site Compatibility Certificate (SCC) has been prepared for Australian Unity Limited by Gary Shiels & Associates Pty Ltd (hereafter referred to as GSA Planning). GSA Planning has expertise in Urban Design, Environmental & Traffic Planning.

This statement is to accompany this SCC submission to the NSW Department of Planning, Industry & Environment (DPIE) for a proposed new Seniors Housing Development at No. 266 Longueville Road, Lane Cove. This application has been made following an initial SCC provided design guidelines that were complied with and a second SCC required the total redesign of the proposal. This third SCC has been prepared at a time when seniors housing is sought after in the locality, the NSW Government is looking for "shovel ready projects" and this community needed project could be commenced in the short term.

The proposal is for a seniors housing development comprising three interconnected buildings that contain the following:

- A 70-bed residential aged care facility;
- 82 self-contained dwellings for seniors;
- Support facilities for residents including a gym, lounge, multi-purpose room, men's shed, salon and outdoor recreational facilities;
- Basement car parking for 122 vehicles;
- Publicly accessible facilities including an auditorium and shop; and,
- Publicly accessible landscaped park fronting Longueville Road and a walkway/link to the existing nearby golf course.

On **6 July 2017**, an SCC for the site was **granted by the Department**, after which a Development Application was lodged to Lane Cove Council in 2017 for a seniors housing development. Following the notification period, meetings with Council, the Independent Assessor and representatives of the adjoining property at No. 268 Longueville Road were held. Design amendments to the DA were subsequently made in response to these meetings and the Independent Assessor's written feedback following this meeting and lodged with Council.

On **11 July 2018**, the DA was presented at the Sydney North Planning Panel (SNPP) who recommended changes and improvements. The amended DA was re-advertised and is currently in the process of being assessed, with a view to the DA being presented at the SNPP in September 2019.

As it had been more than two years since the SCC was issued and the DA has yet to be determined, the current SCC has expired. Accordingly, we requested that our SCC be renewed or a new certificate be granted. Council advised that a new SCC application was required.

On **8 August 2019**, a second SCC application was lodged at the NSW DPIE. This submission endeavoured to highlight that a number of changes had been made to the proposal in response to requests made by the Sydney North Planning Panel (SNPP). These changes, which included:

- an increased setback on the southern boundary of 1m and a 2m landscape strip;
- a further assessment of the ecological relationship with the E2 zone;
- a further site investigation pursuant to SEPP 55; and
- a view assessment from the nearby golf course, East Ridge and Richardson Street West.

A more detailed summary of the Panel request for information is contained later in this submission (see Section 2). Importantly, the SNPP did not request that the building be lowered or that there were any issues relating to height and the Clause 4.6 that accompanied the application.

The applicant embarked on a substantial redesign exercise in order to embrace all of the requests identified by the SNPP. All of these changes were brought together in an amended set of architectural drawings.

However, in **May 2020**, the NSW DPIE released the second SCC report, that may not have had the benefit of the numerous changes requested by the SNPP, and the amendments to the architectural drawings. Notwithstanding that, the second SCC report recommended that the building be lowered to RL 62.80 AHD, effectively reducing the height of building by two storeys for most of its length and one storey at the street. This recommendation was subsequently endorsed by the SNPP. Effectively, this determination is tantamount to a refusal or a total redesign, potentially rendering the project non-viable.

The proposal relies on the provisions under the State Environmental Planning Policy (Housing for Seniors or People with a Disability) (SEPP) 2004 and the R4 High Density Residential zone in the Lane Cove Local Environmental Plan (LEP) 2009. An SCC is required as the proposal is a vertical village and located on land adjoining land zoned primarily for urban purposes under Clause 24 of the SEPP and it relies on the bonus floor space ratio (FSR) provisions under Clause 45 of the SEPP.

The site is ideally located adjoining public open space and in proximity of the Lane Cove Village. The proposal has been designed to provide the opportunity for Lane Cove residents to age in place and remain connected to the community. The proposal has also been designed to activate the street, improve connectivity between the public and private domain, contribute to the village atmosphere of Lane Cove and promote the health and well-being of residents.

This document is divided in five sections which include a Site and Context Analysis; A Description of the Proposal; a Strategic Justification, a Statement on the Site Compatibility Criteria; and a Conclusion.

1.0 SITE AND CONTEXT ANALYSIS

1.1 The Site

The subject site is located approximately 6km north-west of the Sydney CBD, 800m from the Lane Cove Plaza, 2.87km to Chatswood Shopping Centre and is located within the Local Government Area (LGA) of Lane Cove (see Figure 1). The site in its entirety is located on the eastern side of Longueville Road, between Richardson Street West and River Road West and is known as No. 266 Longueville Road, Lane Cove.



Figure 1: Location Map

The site comprises three parcels of land described as Lot 1 in DP 321353, Lot 1 in DP 1227921 and Lot 2 in DP 1227921 (see Figure 2 on the following page). The site is irregular in shape and has a northern boundary of approximately 147m, an eastern frontage to heavy landscaping and the Lane Cove Golf Course of approximately 81m, a southern boundary of approximately 83m and a combined western frontage to Longueville Road of approximately 103m, providing a total development area of approximately 9,204m².

The site has a north to south fall of 0.85m along Longueville Road, and a west to east fall of almost 18m near the eastern most edge of the development area. Beyond the eastern edge of the development site, there is a further fall to the east of approximately 10-11m to the golf course.

The site is occupied by two disused bowling greens, which were created by the placement of fill forming two level areas. A bitumen car parking area is located at the north western corner of the site. A single and two storey brick and weatherboard building with a pitched roof is located near the south western corner of the site. This building currently appears vacant, but was previously occupied by the Lane Cove Music and Cultural Centre (see Photographs 1 to 3 on the following page).

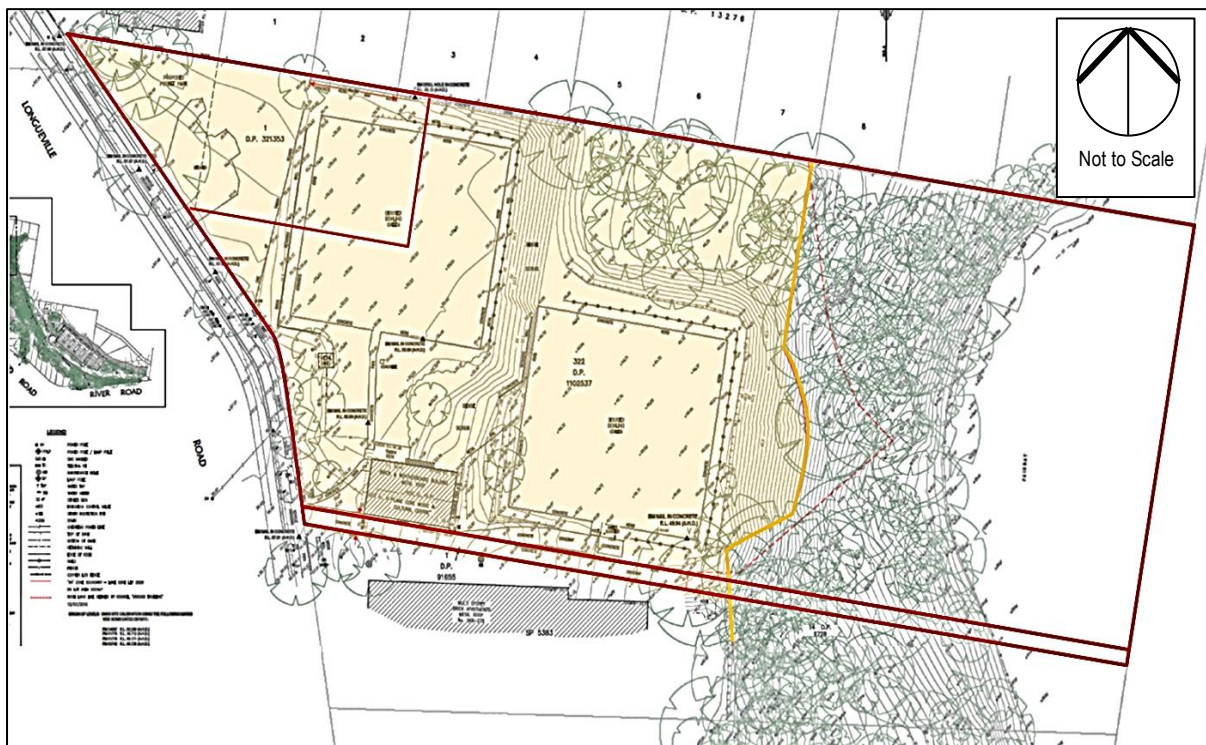


Figure 2: Survey Plan

 The Site



Photograph 1: The site (bitumen car parking area), as viewed from Longueville Road.



Photograph 2: The site and Music and Cultural Centre, as viewed from the upper bowling green, looking south.



Photograph 3: The lower bowling green and rear of the Music and Cultural Centre, as viewed from the eastern end of the bowling green towards the west

Landscaping on the site comprises a mix of lawn areas and dense scrub around the bowling greens and a grove of trees located to the north of the lower bowling green (see Photographs 4 and 5).

Vehicular access to the site is from one of two driveways off Longueville Road. Pedestrian access to the site is from a concrete path from Longueville Road which leads to the existing building. From this building, a separate concrete path provides pedestrian access to the upper bowling green.



Photograph 4: The grove of trees on the northern portion of the site, as viewed from the east, looking west.



Photograph 5: Dense scrub, as viewed from the northern grove, looking south.

1.2 The Surrounding Context

Development in the surrounding area comprises a mix of single and two storey free standing dwelling houses, multi storey residential flat buildings, a Buddhist temple and recreational facilities.

Development to the North

To the north are a residential flat building at Nos. 250-252 Longueville Road and single and two storey freestanding dwelling houses at Nos. 42-58 Richardson Street. The rear boundaries of these properties share a boundary with the subject site and the eastern end of Richardson Street provides access to part of the golf course. Further to the north are multi storey residential flat buildings along Longueville Road.

Development to the East

To the east of the development site is dense bushland on steep topography that leads down towards the Lane Cove Golf Course. Further to the east is a mix of single and two storey dwelling houses with pitched roofs, located on the eastern side of the golf course.

Development to the South

To the south is Nos. 268-270 Longueville Road, a part three and part four storey face brick and concrete residential flat building with a flat roof, located above a garage level. This property is known as 'Timbertops' and shares a driveway along its northern boundary with the subject site. Further to the south are two and three storey residential buildings, a service station and single and two storey commercial buildings.

Development to the West and South West

To the west at No. 231 Longueville Road is a large brick building with a pitched roof and a car parking area. This building is occupied by the Shinnyo-En Buddhist Temple. To the south west is a single storey dwelling house that appears to be occupied by a physiotherapist. Also to the south west is the Longueville Sporting Club which contains two bowling greens, a fitness centre and bistro.

Images of the surrounding development in the locality are shown in Photographs 6 to 12 on the following page.



Photograph 6: Development to the north at Nos. 250-252 Longueville Road.



Photograph 7: Example of development to the north at No. 44 Richardson Street.



Photograph 8: Development to the east - Lane Cove Golf Course, as viewed from the eastern edge of the subject site.



Photograph 9: View from the golf course, looking west towards dense bushland (subject site is located behind bushland).



Photograph 10: Development to the south at Nos. 268-270 Longueville Road as viewed from the shared driveway



Photograph 11: Development to the south at Nos. 268-270 Longueville Road, as viewed from the subject site.



Photograph 12: Development to the west at No. 231 Longueville Road.

2.0 DESCRIPTION OF THE PROPOSAL

2.1 Background to The Proposal

In **October 2015**, Lane Cove Council sought Expressions of Interest (EOI) for the re-development of Council owned land at No. 266 Longueville Road for the purpose of a Seniors Living development under a long term lease arrangement. In June 2016, Australian Unity was selected as one of four organisations to participate in a bid for the redevelopment of the site. In December 2016, Council advised Australian Unity that it was the successful bidder for the redevelopment.

On **8 May 2017**, an SCC was lodged with the Department of Planning and Environment (DP&E) for a new seniors housing development comprising a mix of 70 residential aged care beds, 93 independent living units, two levels of basement car parking for 148 vehicles and associated facilities. The development comprised three interconnected buildings separated by communal open space and included a public park, a new pedestrian link to the adjacent golf course and extensive landscaping. On 6 July 2017, an SCC was issued by the DP&E.

On **19 July 2017**, a Development Application (DA117/2017) was lodged with Lane Cove Council for a seniors housing development comprising 70 residential aged care beds, 90 independent living units/self-contained dwellings and basement car parking for 137 vehicles. Recreational facilities were proposed for residents, together with communal courtyards. The DA included publicly accessible facilities such as a café or retail use, a new landscaped public park fronting Longueville Road and a landscaped through-site link along the northern boundary, connecting the park to the existing nearby golf course.

Following the notification period, meetings with Council and representatives of the adjoining property at No. 268 Longueville Road (known as 'Timbertops') were held and the applicant received written feedback from the Independent Assessor. As a result, a number of modifications were made to the DA plans, in order to improve amenity for surrounding development and clarify the design. This included the relocation of the top floor (Level 7) from Building C to the centre of the development in Building B. This would enable the main roof level at the rear to be similar to the roof at the Longueville Road frontage. As the site falls dramatically from Longueville Road to the eastern boundary, the proposal breached the LEP height limit of 62.80 AHD. The breach was necessary to achieve the internal floor to ceiling heights and allow for roof services. This was supported in an amended Clause 4.6 Variation to a Development Standard.

On **11 July 2018**, the DA was considered at the SNPP at Lane Cove Council, with the Independent Assessor's report recommending approval subject to conditions (Reference No. 2017SNH069 – 117/2017). At the conclusion of this meeting, the Panel resolved to defer its decision to seek additional information and requested that the applicant submit amended plans which would include an increased setback on the southern boundary, additional articulation to the southern elevation and an additional landscaped strip between the site and the adjoining Timbertops land.

The amendments and additional information requested by the SNPP is summarised below:

- Detailed site investigation under SEPP 55
- Independent peer review of traffic assessments
- Assessment of ecological impact to ensure development does not significantly impact flora and fauna on the site and adjacent E2 zone
- Assessment of visual impact from golf course, east ridge line and Richardson St West
- Plans and supporting information provided to the Department for the Site Compatibility Certificate
- Calculation of GFA/FSR based on SEPP
- Drawings that reflect an increased setback on the southern boundary by 1m with no decrease on the northern side, and a 2 metre landscaped strip towards Timbertops for landscape screening
- Based on ecological assessment, eastern boundary to be adjusted is required.

The amended DA was lodged in April 2019, was re-notified and subsequently reviewed by the Independent Assessor.

The first SCC expired on **6 July 2019**. As the amended **DA is still in the process of being assessed**, Council has advised that a new SCC application is required.

On, or about, **8 August 2019**, the second SCC was lodged with NSW Planning Industry and Environment.

In **May 2020**, the NSW DPIE provided their SCC report, recommending the lowering of the building to 62.8 AHD, effectively resulting in the loss of two storeys and a considerable amount of accommodation proposed for seniors. The recommendation was subsequently adopted by the SNPP and the project has not proceeded any further until now.

Accordingly, this third SCC application is re-presented to the NSW DPIE with a request that the history of this application and the design efforts made by the applicant be taken into account in the preparation of the third SCC report.

2.2 The Proposal

The amended proposal currently before Council is for construction of a Seniors Housing Development comprising 70 residential aged care beds, 82 self-contained dwellings and associated facilities. The proposal will comprise three partially interconnected buildings that are separated by communal open space, will be located above two levels of basement car parking and are described as follows:

- Building A – a part three and part five storey structure that has an appearance of part two and part three storeys from Longueville Road. This building contains 20 independent living units, auditorium and shop that is accessible by the public;
- Building B – a part six and part seven storey building containing communal facilities; 32 independent living units and 53 residential aged care beds;
- Building C – a six storey building containing 30 independent living units and 17 residential aged care beds;
- Basement parking, comprising two levels with 122 car parking spaces;
- A public park at the north western corner of the site;
- A new landscaped pedestrian link along the northern boundary; and
- Site embellishment and extensive landscaping.

Importantly, amendments were made to the proposal that may not have been evident to the assessor preparing the second SCC report.

The proposal was modified to meet the requirements of the SNPP. These included the provision of additional setbacks from the southern boundary, increased articulation to the southern elevation and additional landscaping and landscaped screening between the proposal and the residential flat building to the south.

Details of the proposal are shown in architectural plans and documents prepared by Thomson Adsett Architects and submitted separately. A general site plan of the proposal and an indicative floor plan is shown in Figure 3.



Figure 3: Proposed Site Plan

2.3 Overview – Numeric Provisions of the Proposal

A general description and numeric overview of the proposed Seniors Housing development is shown in Table 1.

TABLE 1: NUMERIC OVERVIEW OF THE PROPOSAL		
Site Area		
Development Site Area		9,204m ²
No of Rooms/ Independent Living Units		
Residential aged care facility rooms (RACF)		70 rooms (total)
Independent Living Units (ILU)		82 units (total)
Studios		6
1 bedroom ILUs		4
2 bedroom ILUs		72
Gross Floor Area		
Total		14,472.38m ²
Floor Space Ratio		
Total		0.572:1
Building Height (measured to existing ground line)		
<i>Note: some levels are located below existing ground line</i>		
Building A		2-6 storeys 63.40 AHD and 64.93 AHD
Building B		6-7 storeys 67.01 AHD and 67.76 AHD
Building C		6 storeys 63.40 AHD and 66.80 AHD
Setbacks		
Front (Longueville Road)		8m
Side (North)		12m-25m
Side (South)		Up to 10.7m for the floors above ground level
Rear (to eastern edge of development site)		11.86m to ground truthing line
Open Space and Landscaping		
Internal courtyards (communal)		Courtyard 1 - 443m ² , Courtyard 2 - 505m ²
Rooftop Terraces (communal)		289m ²
Public Park		730m ² approx.
Public link to golf course		1,350m ² approx.
Car Parking		
No. of Car Parking Spaces		122
Loading Area		105m ²

3.0 STRATEGIC JUSTIFICATION AND PRELIMINARY ENVIRONMENTAL PLANNING EVALUATION

This section provides a brief outline on the consistency with regional and local strategies and the relevant key statutory and non-statutory provisions that apply to the site.

3.1 Consistency with Regional and Local Strategies

3.1.1 Greater Sydney Region Plan – A Metropolis of Three Cities

The Greater Sydney Region Plan – A Metropolis of Three Cities was released by the Greater Sydney Commission in 2018 and applies to the site. This document outlines the overarching plan for the future of the Sydney Metropolitan Area over the next 40 years (to 2056). The Plan contains numerous goals which include the provision of world-class service and transport, housing choice to accommodate varied needs and lifestyles, the creation of healthy and connected communities, and protection of the natural environment.

North District Plan

The North District Plan is one of five plans developed by the Greater Sydney Commission and sets out the vision for growth and development in the North District, which covers a number of local government areas, including Lane Cove. The intention of the district plan is to provide a bridge between the local planning provisions developed by Councils and the long term metropolitan planning for Greater Sydney.

In addition to the growth of jobs in key centres and investment in transportation infrastructure, the District Plan projects a substantial demographic change. In particular, the District Plan estimates a 47% increase in the number of people aged 65-84 in the locality and an 85% increase in people aged 85 and over, between 2016 and 2036. This will require more diverse housing choice, affordable housing and increased social infrastructure.

The proposed development will be consistent with the vision for the North District. This is achieved by providing a diversity of housing choice for seniors which include residential care beds, and a mix of studio, one and two bedroom self-contained units, some of which contain guest rooms/studies. A number of these units will also be nominated as affordable housing. The proposal will facilitate social inclusion by providing a range of recreational services and facilities within the development, and some of these such as the shop and auditorium will be available to the public. In addition, the proposal will retain the existing bushland on the eastern side of the site and provide a public park and walkway between Longueville Road and the existing golf course.

3.1.2 Lane Cove Local Environmental Plan (LEP) 2009

The subject site is zoned R4 High Density Residential under Council's LEP 2009, gazetted 19 February 2010 (see Figure 4 on the following page). The site is not a heritage item and is not in a heritage conservation area. However, the site is located opposite a heritage item identified as a Masonic Temple at No. 231 Longueville Road.

A summary of our assessment of the proposed development currently being assessed against the provisions of the LEP is also outlined in Table 2 on the following page.

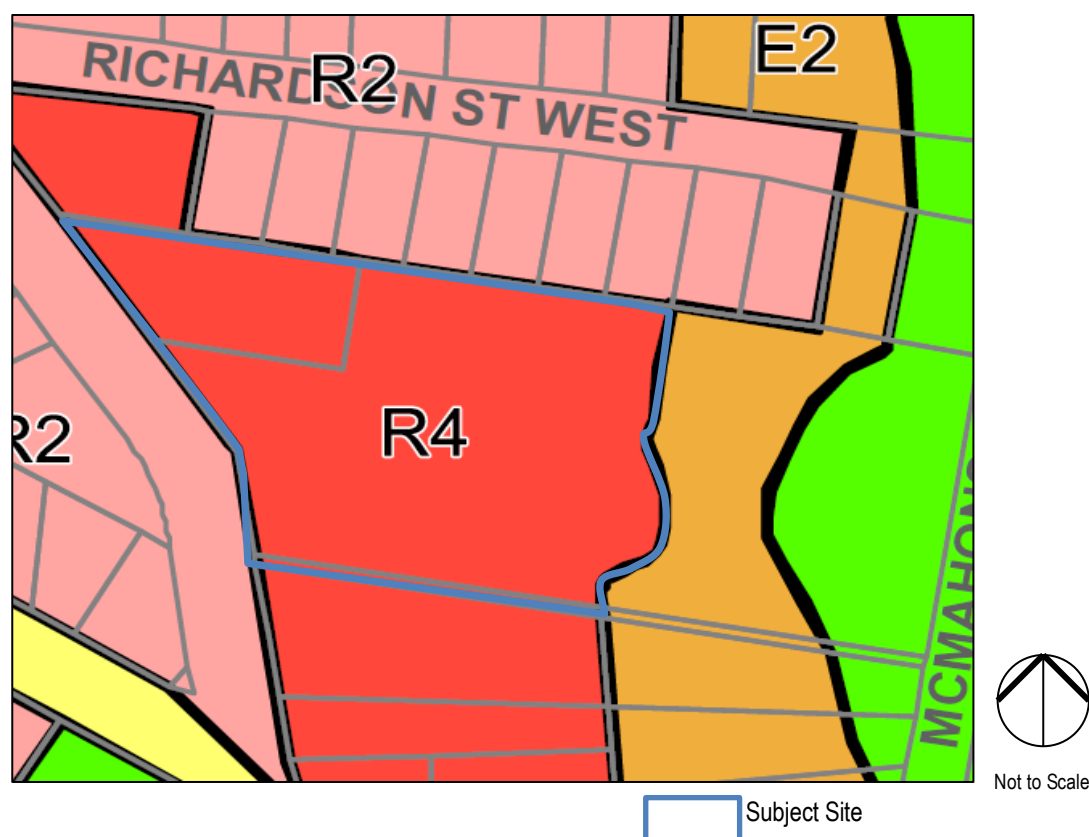


Figure 4: Zoning Map

TABLE 2: PROJECT DATA / COMPLIANCE – LANE COVE LEP 2009			
Site Area: 9,204m ²			
LEP Provisions		Complies / Comments	
Permissibility	R4 High Density Residential	Seniors Housing is permissible with development consent (pursuant to SEPP Housing for Seniors)).	
Heritage Item	The site is not a heritage item	N/A	
Conservation Area	NO	N/A	
Within the vicinity of Heritage Item	YES	General Heritage Item of Local significance – Item 182 - <i>Masonic Temple at No.231 Longueville Road.</i> A Heritage Impact Statement was prepared and accompanied the DA	
Development Standard	Requirement	Proposal	Complies
Building Height (Max)	62.8 AHD	Building A roof – 63.40 AHD and lift overrun 64.93 AHD Building B roof – 67.01 AHD and lift overrun 67.76 AHD Building C roof – 63.40 AHD and lift overrun 66.80 AHD	NO Supported in a Clause 4.6 Exception to Development Standard
Floor Space Ratio (Max)	1.1:1 Bonus 0.5:1 may apply under SEPP (Housing for Seniors)	1.572:1	YES

The proposal breaches the LEP height standard of 62.80 AHD, to accommodate appropriate internal ceiling heights, provision of lift overruns and other associated structures and to relocate the additional storey from Building C (presented in the original DA) to the middle of the site in Building B. In our opinion, the proposal will continue to satisfy the objectives of the height standard and will not have unreasonable impacts on adjoining development. A justification under Clause 4.6 of the LEP has been provided as part of the amended DA submission currently before Council.

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

State Environmental Planning Policy (SEPP) Housing for Seniors or People with a Disability 2004 (as amended) was gazetted on **28 September 2007**, came into force on **12 October 2007** and applies to the site and the proposal.

The proposed 70 residential aged care facility (RACF) beds and 82 self-contained dwellings (independent living units) for seniors will be designed to meet the relevant standards and provisions of the SEPP. Residents will have access to a range of on-site facilities, including an art room, auditorium, gymnasium, library, activity room, men's shed and communal courtyards. The proposal is on a site that is in proximity of shops and services in the Lane Cove Village and is designed to satisfy the relevant design principles. These include neighbourhood amenity and streetscape, privacy, solar access, stormwater, crime prevention, accessibility and waste management.

The proposal also relies on the Clause 45 of the SEPP, which enables development to exceed the maximum permitted FSR by a bonus of 0.5:1, provided that on-site support services will be provided to residents and at least 10% of the dwellings will be affordable places. The applicant has confirmed as part of the current DA submission before Council that it will provide on-site services and 10% affordable places.

3.1.4 State Environmental Planning Policy (SEPP) No. 55 – Remediation of Land

SEPP No. 55 – Remediation of Land was gazetted on 28 August 2005 and applies to the whole of the State. Clause 7(1) requires the consent authority to consider whether land is contaminated prior to the consent of development on that land. A preliminary investigation revealed that there may be varying degrees of contamination in selected areas of imported fill within the site.

In July 2018, the SNPP requested that a detailed site investigation under SEPP No. 55 Remediation of Land be prepared to demonstrate that the site is suitable for residential development.

Accordingly, a Stage 2 Detailed Environmental Site Investigation was prepared by LRM Global and lodged with Council for review. LRM Global stated that the report satisfies the conditions as required to achieve compliance with SEPP No. 55. The report concluded that based on the soil and groundwater data, the site is considered suitable for the proposal with no risk to human health following the disposal of fill material on the site. This document is currently being considered by the Independent Assessor.

3.1.5 State Environmental Planning Policy (SEPP) No. 65 Design Quality of Residential Flat Development

SEPP No. 65 Design Quality of Residential Apartment Development was gazetted on 26 July 2002 and may apply to the component of the development that includes self-contained dwellings. The design principles have been considered in the proposed seniors housing development and a SEPP 65 document has been prepared by Thomson Adsett Architects as part the DA submission. This report will indicate that the proposal is satisfactory in terms of the nine principles, being Context, Built Form & Scale, Density, Sustainability, Landscape, Amenity, Safety, Housing Diversity & Social Interaction and Aesthetics.

The report will also consider the compliance of the proposal in respect of the independent living units with the key considerations of the Apartment Design Guide (ADG). Based on the information provided, the following comments are provided in respect of the key controls:

- All the units comply with the minimum requirements for internal area and are capable of complying with the majority of private open space requirements;
- 60% of the independent living units will be cross ventilated; and
- 74% of the units will receive at least 2 hours direct sunlight between 9am and 3pm in living and private open space areas.

In our opinion, the proposal will adequately satisfy the provisions of SEPP No.65 as well as the relevant controls contained in the Apartment Design Guide.

3.1.6 Lane Cove Development Control Plan (DCP) 2010

The Lane Cove DCP came into force on 22 February 2010. The DCP applies to the site and the proposed development. Part C of Council's DCP contains specific controls relating to Residential Localities. The subject site is identified as Locality 7 – 266 Longueville Road.

The compliance of the proposal against the site specific and general controls in the DCP are summarised below.

TABLE 3: LANE COVE DEVELOPMENT CONTROL PLAN 2010			
Site Area: 9,204m ² (The R4 Zoned Land)			
Provision	Requirement	Proposal	Complies/Comments
Height	62.8 AHD maximum level	Building A roof – 63.40 AHD and lift overrun 64.93 AHD Building B roof – 67.01 AHD and lift overrun 67.76 AHD Building C roof – 63.40 AHD and lift overrun 66.80 AHD	NO Supported in a Clause 4.6 Exception to Development Standard
Floor Space Ratio	1.1:1 Additional 0.5 may be permissible under SEPP Seniors Living (Total 1.6:1)	1.572:1	YES
Building Separation	12m – up to 4 storeys 18m – 5 storeys and up	>12m to north boundary (no survey data for the houses on the north) >25m at Building C Min 13.1m from the south (measured to closest corner of Timbertops)	Partial compliance. Appropriate on merit
Building Depth	Maximum 18m depth excluding balconies	Approx 15.9m – 22m excluding balconies	Variation sought given privacy, solar access and ventilation provisions are met.
Front Setback	8m	Generally 8m at and above street level.	YES
Side setback (southern)	6m up to 4 storeys Additional 3m setback for 5 th and above.	Setback greater than 6m on all levels. More than 9m at upper levels	YES
Side setback (northern)	12m	12m – 25m	YES
Rear setback	6m up to 4 storeys 9m for 5-8 storeys	11.86m from ground truthing line to edge of habitable space	Partial compliance. Appropriate on merit

Vehicle Entry	Limited to one access point. Utilise existing egress/easement.	One access point to porte cochere and one exit point	Refer to Architectural Plans and Traffic Report
Car parking	Provide underground car parking. Soft landscaping to be utilised above car parking.	Underground car parking provided. Some landscaping provided over	YES
Building Orientation/Length	Max 40m oriented towards Longueville Road.	Building length is angled and less than 40m fronting Longueville Road	YES
Views and Vistas	Maintain views through to North Sydney and native bushland.	Setbacks maintain some views	YES
Pedestrian Connection/Through-site link	Through-site pedestrian connection to Longueville Road in accordance with AS1428.1.	Through site pedestrian connection is provided	YES Able to comply as part of DA submission
	Pathway set back minimum of 2m from northern boundary.	Pathway set back minimum of 2m from northern boundary.	YES
	Minimum pathway width is 2m.	Pathway is approximately 2m in width.	Able to comply
Landscaping/Public Park	Retain native bushland and provide landscaped buffer to golf course.	Majority of native bushland to the east is to be retained	YES
	Provide green link and lineal park from Longueville Road. Improve natural surveillance, visibility and security.	Green link and lineal path from Longueville Road is provided	YES.
Landscaping buffer to southern boundary	Provide landscape buffers between 268 Longueville Road and dominant building forms on site.	Landscaping provided within the southern setback	YES
GENERAL PROVISIONS			
Provision	Proposal		Complies/Comments
Building with frontage to Longueville Road must be read as max 3 storey.	Longueville Road frontage appears as part 2 and part 3 storey (set back)		YES
Buildings at rear of the site no higher than those with frontage to Longueville Road.	The proposal has a height that is compatible with Timbertops		Appropriate on merit
Development should step down the site and respond to topography of land.	Building C step down occurs only as the additional top level has been relocated to Building B		Variation sought as part of DA
Buildings at interface of the bushland are to have upper level setbacks of 3m above four storeys.	No setback above four storeys		Appropriate on merit. Variation sought as part of DA
Locate private and public open space at interface of the bushland and golf course.	Private and public open space is provided at the interface of bushland and golf course		YES
Utilise varying external materials and architectural embellishments. Articulate, modulate and emphasise building form.	Varying materials and architectural modulation and detail will be proposed		YES
Orientate building to improve privacy. Limit opportunities for overshadowing.	Building separation and setbacks from adjoining development are proposed to maintain privacy and limit overshadowing		YES
Accessible pathways should include covered elements, landscaping and greenery.	Pathways are designed to include landscaped elements		YES
Integrate lighting into the public domain. Improve natural surveillance, visibility and security.	Lighting in the public domain will be provided		Able to comply
Reduce visual prominence of underground car parking through landscaping.	Basement car parking below street level and not readily visible		YES
Allow for possible roof gardens.	Roof gardens proposed to selected areas		YES
Seniors Living accommodation should ensure good solar access and well configured open space to the public domain that is easily accessible.	The configuration of buildings will enable rooms and units to have solar access. Courtyards provide a connection to the public domain where practicable		YES
Internal configurations meet the requirements of SEPP Seniors Living 2004, Seniors Living Policy, Urban Design Guidelines for Infill Development 2004.	Proposal is capable of satisfying the relevant requirements of the Seniors living policies and guidelines		Able to comply

Private balconies above ground floor minimum of 10m ² with dimension of 3m. Private balconies to one bedroom apartments above ground floor should be minimum 6m ² with dimension of 2m.	Majority of 2 bedroom unit balconies above ground level are >10m ² . Majority of 1 bed unit balconies are >6m ²	Communal courtyards provide additional recreational areas where variations to the private open space occur.
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3.1.7 Draft Strategy for an Age Friendly Lane Cove: 2018 – 2023

The Strategy for an Age-Friendly Lane Cove 2018 – 2023 is the second strategy developed, following Council's membership into the World Health Organisation (WHO) Global Network of Age-Friendly Cities and Communities. In consultation with the community and guidelines developed by WHO, Council has developed an Action Plan for the next five years.

The Action Plan would assist Council in creating an environment that will promote active ageing and increased community engagement. Under the title of "Housing", the goal under the Action Plan states, inter alia:

to increase the opportunities for older people to access appropriate and affordable housing options, including residential aged care without leaving Lane Cove

The proposal will assist Council in achieving its housing goals by providing a seniors housing development which contains a residential aged care facility and a diversity of self-contained units, some of which will be nominated as affordable places. This development contains a number of recreational facilities and is well located near public transport and other services in Lane Cove.

3.2 Public Interest

Lane Cove is experiencing a progressively ageing population. ABS Census data indicates that the Lane Cove LGA is experiencing an increase in the number of people over 65 years of age, from 12.5% of the population in 2006 to 13.2% in 2011. The North District Plan estimates a substantial increase in the number of people in the 65-84 and 85+ age brackets over the next 20 years. Accordingly, there will be an increasing demand for aged care accommodation.

In our opinion, a seniors housing development on the subject site will have substantial social and economic benefits within the Lane Cove municipality and wider community. The proposal will enable residents of the Lane Cove community and surrounding areas to access a wide range of aged care and self-care accommodation, in a location that has access to primary bus routes and alternate forms of transport. The building provides high quality "Ageing In Place" accommodation which is in limited supply in the Lane Cove LGA.

Additionally, future residents will have access to on-site cultural and recreational facilities. This is in addition to the existing retail, commercial, health, recreational, community, cultural and transport services in the nearby Lane Cove Village and surrounding suburbs.

The proposal will also provide employment opportunities during its construction and operational stages and the influx of new residents in the locality will also have commercial benefits for local business operators. For the reasons stated above, it is our opinion that the proposed development is in the public interest.

4.0 STATEMENT ON THE SEPP COMPATIBILITY CRITERIA

This section outlines how the site is suitable for more intensive development and whether the proposed seniors housing development is compatible with the surrounding environment. The NSW Department of Planning and Environment identifies five criteria which are to be considered as part of the SCC application. The criteria and our response will be outlined in the following paragraphs.

Criteria 1: The natural environment (including known significant environmental values, resources, or hazards), and the existing uses and approved uses of land in the vicinity of the proposed development

Response: The natural topography of the site involves considerable fall from west to east. Parts of the site were filled with imported material and benched in order to create the existing bowling greens.

The proposal will remove the existing fill and undertake excavation to accommodate the development, including car parking. The majority of this excavation will occur away from the site's boundaries and neighbouring properties. A geotechnical report was prepared as part of the DA submission, which included recommended excavation and basement construction techniques to avoid adverse impacts on adjoining land and structures. The above-ground structures will also be set back to allow for extensive planting in the form of trees, shrubs and groundcover throughout, which will provide a landscaped buffer between the site and adjoining residential development to the north and south and complement the existing bushland on the east, which will be retained.

Extensive areas of publicly accessed open space will be provided in the form of a public park with frontage to Longueville Road and a landscaped walkway/through-site link along the site's northern boundary which will provide a future pedestrian connection between the park and the golf course to the east. Communal courtyards for the residents will be provided within the development to assist with social inclusion.

The proposed landscaping will enhance scenic appearance of the site when viewed from the street and surrounding development, and provide functional outdoor recreational spaces for residents and visitors alike.

A landscape plan prepared by Taylor Brammer Landscape Architects forms part of this application and is submitted separately.

Criteria 2: The impact that the proposed development is likely to have on the uses that are likely to be the future uses of the land

Response: The proposal will be located on underutilised and underdeveloped Council owned land that has been earmarked for redevelopment to improve the social and community outcomes for the locality. The proposed seniors housing development will operate under a long term lease arrangement and has been designed to reflect this through the provision of well-designed rooms, self-contained units that generally satisfy the requirements of the Apartment Design Guide, provision of staff facilities, recreational facilities and outdoor spaces. The proposal will include a public park and through-site link which will also be maintained for the life of the development.

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

Response: The site is located approximately 800m away from the Lane Cove Village, which contains a wide range of social, retail, commercial, medical, community and recreational services. A bus stop is located on the eastern and western sides of Longueville Road, in front of the site. This provides direct access to regular public transport services along Longueville Road via Sydney Buses Route Nos. 253 and 254. These services have bus stops well within 400m of the facilities in and around the Lane Cove Village, from which there are connecting bus services to Chatswood, North Sydney and surrounding suburbs.

Within the development, facilities such as games rooms, gym, salon, library, and communal indoor and outdoor open space will be provided to enhance the social, cultural and physical well-being of its residents. As the site is within an established area, electricity, telephone, water and sewerage are also readily available and can be suitably connected and upgraded as required to suit the development.

Criteria 4: In the case of application in relation to land that is zoned open space or special uses – the impact that the proposed development is likely to have on the provision of land for open space or special uses in the vicinity of the development

Response: The subject site is zoned R4 – High Density Development and is located adjacent to land on the eastern side which is zoned E2 – Environmental Conservation under the Lane Cove LEP. There are no Special Use zones adjoining the site. In our opinion, the proposal is not likely to result in adverse impacts on the adjoining E2 zoned land. Excavation and construction methods recommended by geotechnical and other consultants will be employed to avoid site disturbance on adjoining properties. The existing vegetation on the E2 zoned site will be retained to enhance the landscaped character of the area and the eastern portion of the new pedestrian walkway that will connect with the golf course will be designed to ensure that there is minimal disturbance to any existing significant planting.

Criteria 5: Without limiting any other criteria, the impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing uses, approved uses and future uses of land in the vicinity of the development

Response: The site is located in an area that contains a mix residential building types, a golf course, Buddhist Temple, and some nearby commercial uses. The proposal will make a positive contribution to the locality by providing seniors housing in a highly accessible area and will be of a built form that addresses the street, provides access to the facilities for public use and is compatible with the uses of surrounding development.

When viewed from Longueville Road, the proposal will appear as a part two and part three storey development which is contextually compatible with development in the locality. As the existing bushland to the east of the development site will be retained, the proposal will be largely screened when viewed from the golf course. By providing three separate built forms with central courtyards and setbacks of up to 25m, there is a high degree of articulation and opportunities for substantial landscaping.

The provision of a shop and auditorium will promote integration with residents of the facility and the general public. The inclusion of a public park and through site link on the northern side will provide additional recreational facilities, provide visual connectivity with the communal courtyards within the development and create a more engaging public/private interface.

Three dimensional images that show the proposed streetscape and internal courtyards are shown in Figure 5 and Figure 6 on the following page.

The proposed built form is also unlikely to result in unreasonable amenity impacts on adjoining development. In respect of solar access, shadow diagrams have been prepared by Thomson Adsett architects, which indicate the extent of solar access available to both the proposed development and adjoining properties. While there will be solar impacts as a result of the proposed development, this is inevitable, given the adjoining site has not been developed to its potential. Notwithstanding this, the overall built form location, setbacks and height have been designed to ensure solar impacts are minimised and maintain compliance with the ADG and DCP. More detailed shadow diagrams form part of the DA submission.



View from North West in Longueville Road



View from South West in Longueville Road

Figure 5: 3D Street Images of the Proposal



Courtyard View



Southern Façade, as Viewed from the Driveway Between the Site and Timbertops



Eastern View from the Driveway, Showing Relationship Between the Proposal and Timbertops

Figure 6: 3D Images of the Proposal

Privacy for adjoining developments to the north and south will be achieved with building setbacks and landscaping and careful location of windows. Within the proposed development, privacy will be maintained through building separation and provision of screens and careful placement of windows. An Acoustic Report that formed part of the DA submission assessed the acoustic impact of the proposal on surrounding development and included measures to mitigate any acoustic impacts. View impact reports were also prepared as part of the original and amended DA submission. The reports concluded that while parts of the proposal will be visible from the street, the proposal would not be easily visible from the golf course to the east, due to the presence of heavy vegetation. In addition, the reports concluded that the amended proposal would not create significant view loss, with the additional level over Building B not causing significant impacts on the streetscape, or the loss of valued view items from adjoining properties when assessing the proposal under the planning principles of *Tenacity Consulting vs. Warringah Council*, compared to a fully compliant building.

A Traffic Report was prepared by Varga Traffic Planning as part of the amended DA to examine the traffic, parking and access implications of the proposed development, and respond to the issues raised by a peer review and neighbourhood submissions following notification. This document is submitted separately.

The traffic report concluded that the site is feasible for the proposed development and that traffic and parking effects will be manageable.

5.0 CONCLUSION

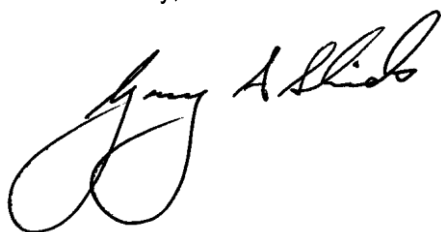
In our opinion, the proposed seniors housing development will provide high quality accommodation and extensive services for seniors, will activate the street and have a built form that will complement the surrounding development in Lane Cove.

The proposal complies with the FSR standard under the SEPP Housing for Seniors and complies with the majority of provisions under the Lane Cove DCP. While the proposal breaches the height standard under the LEP, the proposal has been designed to minimise amenity impacts on adjoining development and is an appropriate design response given the unusual site constraints. As important, the proposed development will respond to the relevant goals set out in the GSC document *The Greater Sydney Region Plan* in respect of accommodation and services for senior persons.

Submitted with this application are architectural drawings prepared by Thomson Adsett and Landscaping Plans prepared by Taylor Brammer along with supporting documentation and/or drawings from landscape, environmental and traffic consultants.

We look forward to a favourable recommendation for a Site Compatibility Certificate, which will facilitate a smooth passage of the DA and will have benefits for the community. Please do not hesitate to contact our office on 9362 3364 if you require any clarification or additional information.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Gary A Shiels', with a large, stylized initial 'G'.

Dr Gary A Shiels
MANAGING DIRECTOR