

## Site Compatibility Certificate Application

4-12 Neringah Avenue South, Wahroonga

Submitted to the NSW Department of Planning,  
Industry and Environment

On behalf of HammondCare

28 June 2021 | 2210216



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## 1.0 Introduction

This Site Compatibility Certificate (SCC) application has been submitted to the NSW Department of Planning, Industry and Environment (DPIE) to demonstrate compatibility of the proposed development of part of the site at 4-12 Neringah Avenue South, Wahroonga (the Site), for the purposes of seniors housing that seeks additional floor space in accordance with the provisions of Clause 45 of the *State Environmental Planning Policy (Housing for Seniors and People with a Disability) 2004* (Seniors Housing SEPP).

The purpose of the SCC application is to facilitate the preparation of a Development Application (DA) to be lodged with Ku-ring-gai Council for the redevelopment of Neringah Hospital for a seniors housing development with new palliative care facilities. This SCC application describes the Site, its environs, the proposed development concept, and demonstrates that the proposed development massing and envelope is compatible with the surrounding land uses, having regard to the criteria specified in Clauses 25, 26 and 45 of the Seniors Housing SEPP.

This SCC has been prepared by Ethos Urban on behalf of HammondCare and should be read in conjunction with the information contained within and appended to this report (see Table of Contents).

### 1.1 Background

HammondCare is an independent Christian charity that specialises in dementia and aged care, palliative care, rehabilitation and older people's mental health. They are committed to supporting people of low or no financial means as part of their mission and are recognised both nationally and internationally as being one of Australia's most innovative health and aged care providers. They offer hospital care, residential aged care, and community services across NSW, QLD, ACT and VIC, and Dementia Support Australia nationwide.

HammondCare is listed as an Affiliated Health Organisation under Schedule 3 of the Health Services Act 1997, meaning it is recognised as part of the public health system. Section 13(3) of the Act cites the principal reason for recognising affiliated health organisations is to enable certain non-profit, religious, charitable or other non-government organisations and institutions to be treated as part of the public health system where they control hospitals, health institutions, health services or health support services that significantly contribute to the operation of that system. Accordingly, HammondCare is best defined as a health care provider and plays an important role in the public health care system.

This project has been initiated as part of HammondCare's overarching vision to revitalise their existing palliative care facilities at Neringah Hospital, which have reached the end of their usable life and are no longer fit for purpose, as well as providing additional seniors housing to address key demographic trends that are prevalent in northern Sydney. By 2031, the number of people aged 65 or older in northern Sydney is expected to increase to 18% (approximately 1.3 million people) of the population and the need for specialist dementia care is estimated to double in NSW by 2051. At the current occupancy of 5% of 65+ residents in seniors housing, the projected ageing population equates to demand for an additional 65,000 new aged care spaces in the next 10 years. The overarching objective of this project is to provide a range of seniors housing typologies at the site to enable this demographic to continue to live well and maintain independence as they age via access to appropriate support and care.

### 1.2 The Proposal

This SCC application relates to the redevelopment of an existing seniors housing / health services facility development at 4-12 Neringah Avenue South, Wahroonga. Specifically, the proposal is for a development comprising two new buildings which will include a mix of self-contained dwellings, residential aged care facilities and palliative care beds. An indicative concept scheme has been prepared in support of this SCC application to demonstrate the suitability of the site for the proposal which will comprise of approximately:

- 60 self-contained dwellings;
- 9 residential aged care facility beds;
- 18 palliative care beds (Schedule 3 health services facility)
- The provision of 90 car parking spaces within basement levels;

- Associated amenities; and
- Site works, landscaping, and public domain works.

### 1.3 Pre-Lodgement Consultation

On 9 June 2021, the applicant and the project team met with DPIE following the development of the current concept scheme to discuss HammondCare's overall vision for the site, the preliminary architectural concept scheme as well as the potential to submit a SCC application to facilitate additional floorspace pursuant to Clause 45 of the Seniors Housing SEPP. Key matters raised during the meeting included:

- The compliance of the surrounding area with the relevant provisions of Clause 26 of the Seniors Housing SEPP, principally, the gradient of the pathway known as 'Archdale Walk' between the Site and Wahroonga Shopping Village;
- The suitability of the proposed use and scale of the concept in its surrounding context;
- The facilitation of palliative care services in accordance with the *State Environmental Planning Policy (Infrastructure) 2007* (Infrastructure SEPP); and
- The provision of a publicly accessible through-site link.

These matters have been addressed throughout this report and are supported by accompanying technical information.

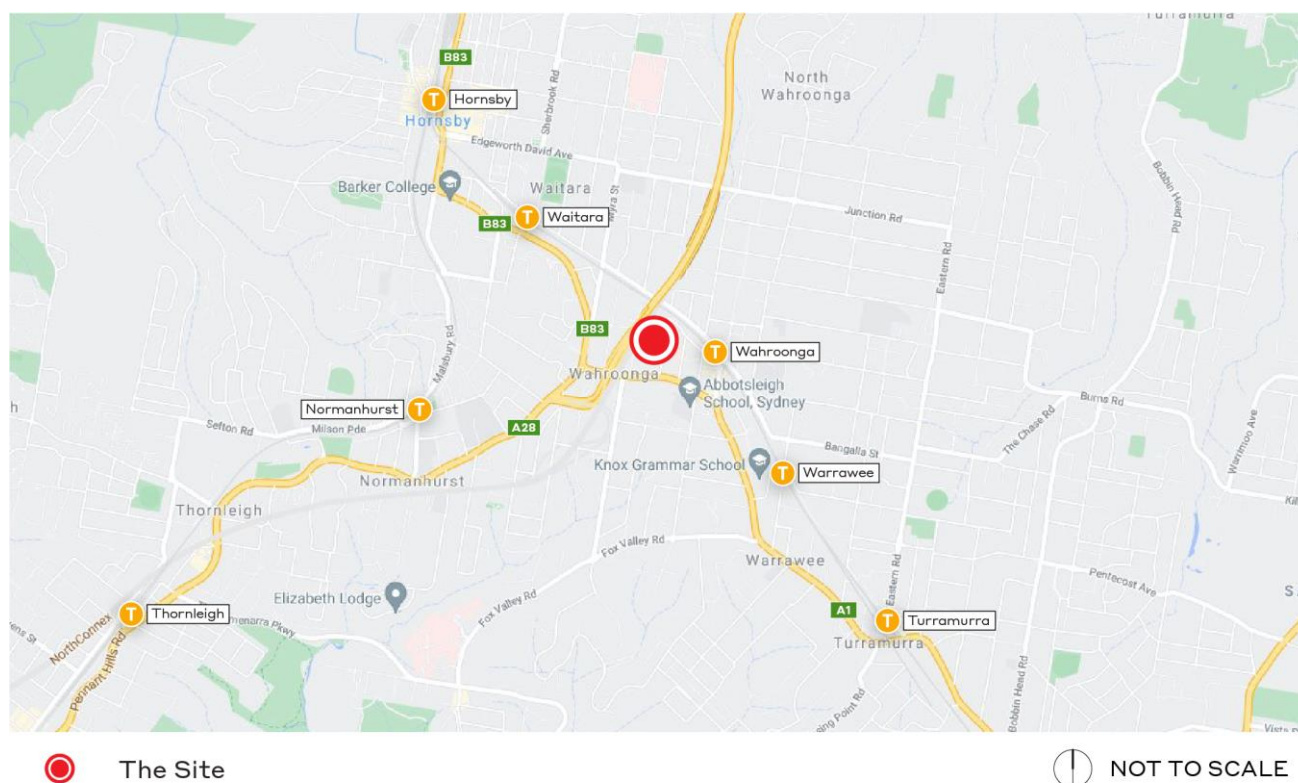
A pre-lodgement meeting was also requested with Ku-ring-gai Council on 25 May 2021, however, due to COVID-19 restrictions, it was advised that only written advice could be provided by August 2021. Notwithstanding, the SCC application will be referred to Council as part of the assessment process and a formal pre-DA will be held prior to the submission of the future DA.

## 2.0 Site Context

The Site is located at 4-12 Neringah Avenue South, Wahroonga, within the Ku-ring-gai Council Local Government Area. The Site is legally described as:

- Lot 1 in DP960051 (2 Neringah Avenue South, Wahroonga);
- Lot 1 in DP1199937 (4-10 Neringah Avenue South, Wahroonga); and
- Lot 52 in DP2666 (no street address).

The site is located approximately 300m West of Wahroonga Train Station and 100m North of the Pacific Highway, with the M1 Pacific Motorway being approximately 200m to the West of the site. Approximately 2km Northwest is the suburb of Hornsby, a major commercial centre servicing the Northern suburbs of Greater Sydney. The locational context of the Site is shown in **Figure 1**.



**Figure 1 Context Map**

Source: Ethos Urban

## 2.1 Site Description

The Site is bound by Neringah Avenue South to the East and Woonona Avenue to the West, and is predominantly surrounded by a mix of medium to high density residential development, with a number of low density dwellings also interspersed throughout the surrounding vicinity. The site has a total area of approximately 10,770sqm. The part of the site that is proposed to be developed for the purposes of 'Vertical Villages' is located in the Eastern portion of the site and has an area of approximately 6,490sqm, as shown in **Figure 2** below.





**Figure 2** Aerial view of the site, with the area of the proposed development also outlined in blue

Source: Nearmap, Ethos Urban

The site currently comprises three main buildings. The western portion of the site, fronting Woonona Avenue, contains the 4 storey 'Wahroonga' building, which is currently utilised as the primary location for residential aged care facility beds and associated amenities. To the South of the Wahroonga building, is the locally heritage listed 'Woonona Cottage'; a single storey former dwelling that is now utilised by HammondCare for on-site administration purposes. The existing residential aged care facility has a GFA of 3,736sqm and Woonona Cottage has a GFA of 265sqm.

The eastern portion of the site, which is the subject of this SCC application, is currently occupied by 'Neringah Hospital,' a Schedule 3 health services facility that comprises HammondCare's existing palliative care facilities as well as hospital administration areas. This building is four storeys in height and has a GFA of 3,736sqm. Adjacent to the Neringah Hospital building are two car parks – one to the North and one to the South, and a small multi-purpose building of approximately 100sqm that is currently utilised by hospital and HammondCare staff.

**Figures 3-8** show the existing development on site.





**Figure 3** The existing 4 storey 'Wahroonga' building on site, viewed from Woonona Avenue looking East

Source: Ethos Urban



**Figure 4** The existing 'Neringah Hospital,' viewed from the car park looking North

Source: Ethos Urban



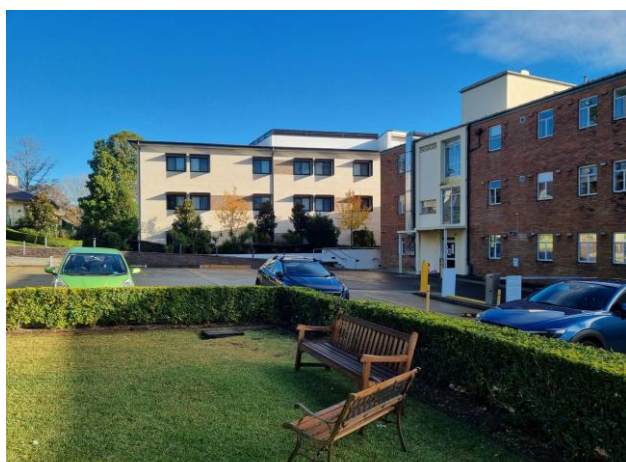
**Figure 5** The local heritage listed 'Woonona Cottage' on site, viewed looking West

Source: Ethos Urban



**Figure 6** The existing multi-purpose building, viewed looking South

Source: Ethos Urban



**Figure 7** Interface between the Southern carpark, Neringah Hospital and Wahroonga Building, viewed looking West

Source: Ethos Urban



**Figure 8** Existing carpark to the South of Neringah Hospital, viewed looking Southeast

Source: Ethos Urban



## 2.2 Description of Surrounding Environment

### Development to the North

To the North of the Site, a recently completed 5 storey residential flat building known as 'The Sirius' is located at 14-18 Neringah Avenue South. As well as this, there is also a variety of other low to medium density residential dwellings located before the North Shore Rail corridor, which is situated approximately 150m to the North of the Site.

### Development to the East

To the East of the Site, across Neringah Avenue South, are more medium density residential flat buildings, which are traversed by 'Archdale Walk,' a pathway that leads to the nearby Wahroonga Shopping Village and Wahroonga Train Station. Wahroonga Shopping Village contains all the required services under the Seniors Housing SEPP such as shops, bank service providers, retail and commercial services, community services and recreational facilities. A detailed breakdown of the available infrastructure and services is provided in **Section 5.3** of this report.

### Development to the South

To the South West of the Site, at 1 Woonona Avenue, is a two storey residential dwelling, whilst the main feature is the local heritage listed Sydney Water Reservoir, which fronts onto the Pacific Highway, approximately 150m to the South of the Site.

### Development to the West

To the West of the Site is a variety of low to medium density residential dwellings, as well as the primary school campus of Abbotsleigh Girls School at 22 Woonona Avenue.

Figures 9-12 detail the development surrounding the Site.



**Figure 9** 7 Neringah Avenue South (east of site), viewed looking East

Source: Ethos Urban



**Figure 10** 'The Sirius' residential flat building, located at 14-18 Neringah Avenue South (north of site), viewed looking West

Source: Ethos Urban



**Figure 11** Sydney Water Reservoir (south of site), viewed from Neringah Avenue South looking Southwest

*Source: Ethos Urban*



**Figure 12** Townhouses located at 15-17 Woonona Avenue (north west of site), viewed from the site looking Northwest

*Source: Ethos Urban*

### 3.0 Proposed Concept

#### 3.1 Description of Proposal

The future development proposes seniors housing and palliative care services across two buildings ranging from 4-5 storeys, comprising of approximately:

- 9 residential aged care facility beds which will be integrated with the existing facility;
- 18 palliative care beds (Schedule 3 health services facility);
- 60 self-contained dwellings;
- 90 parking spaces within basement parking areas; and
- Associated amenities, landscaping and public domain works.

Architectural Plans showing the indicative concept have been prepared by Bickerton Masters (BMA) and are provided at **Appendix A**. A general Site Plan of the proposal is shown at **Figure 13**.

The proposed concept has been informed by a detailed site analysis that has considered all applicable built form and natural environment opportunities and constraints. As a result, the buildings have been positioned and articulated to maximise their integration with the surrounding built and natural character as well as minimise the potential for any adverse impacts on neighbouring residents and the internal amenity of the site. This is discussed in further detail in **Sections 5-6** below.



**Figure 13** Proposed Site Plan

Source: BMA



A numerical overview of the proposed development is provided below in **Table 1**.

**Table 1 Numerical summary of the indicative development concept**

Component	Description
Site Area	6,490sqm
Gross Floor Area	<ul style="list-style-type: none"> <li>Self-contained dwellings: 6,025sqm</li> <li>Residential aged care: 870sqm</li> <li>Palliative care: 1,330sqm</li> <li>Community Facilities: 1,350sqm</li> <li>Ancillary services/other: 800sqm</li> </ul> <p><b>Total: 10,600sqm</b></p>
Building Height	17.5m (maximum, height is variable in accordance with the stepped nature of the roofline)
Floor Space Ratio	1.6:1
Number of self-contained dwellings	<ul style="list-style-type: none"> <li>North Building: 27</li> <li>South Building: 33</li> </ul>
Parking spaces	<ul style="list-style-type: none"> <li>North Building: 27</li> <li>South Building: 63</li> </ul>
Deep Soil	2,630sqm (29%)

It is noted that the proposal will deliver a building height that is in accordance with the definition provided in Clause 3 of the Seniors Housing SEPP. Height is interpreted as:

***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.*

As well as this, the proposal will deliver a floor space ratio that has been calculated with consideration to the definition of gross floor area provided in Clause 45(4) of the Seniors Housing SEPP. This clause interprets it as:

*(4) In calculating the **gross floor area** for the purposes of subclause (2), the floor space used to deliver on-site support services (other than any floor space used to deliver communal or residents' living areas) is to be excluded.*

### 3.2 Landscaping

The proposal will seek to retain significant trees along the periphery of the site boundary, to maximise both tree canopy cover as well as screening along property boundaries for privacy and enhanced streetscape. As well as this, additional trees will be planted along the Northern site boundary at the site of the current car park in order to provide further privacy screening for the adjacent townhouse development at 15-17 Woonona Avenue as well as the residential flat building at 14-18 Neringah Avenue South. It is noted that 3 trees are proposed to be removed to facilitate the delivery of the Southern building. This is discussed further in **Section 5.2**.

Large trees will also be planted within the building setback areas along Neringah Avenue South with the principal function of mitigating the visual bulk and scale of the proposed development when viewed from the street, as well as to contribute to the distinct bushland character of the surrounding locality.

The proposed development will also provide a through-site link for the HammondCare community in the form of a green spine that is proposed to bisect the two proposed buildings before then joining the pedestrian pathway that currently exists between the Wahroonga building and Woonona Cottage. This will provide a green, pedestrian through-site link between Neringah Avenue South and Woonona Avenue which will not be secured and will be appropriately landscaped to deliver an element of visual amenity as well as to break up the visual bulk and scale of the proposal when viewed from the street.

A Concept Landscape Design detailing proposed landscaping works has been prepared by Taylor Brammer Landscape Architects and is provided at **Appendix B**. Landscaping is also discussed in further detail as part of the compatibility analysis provided in **Section 5.2** and **5.3**. An extract of the proposed concept landscape design is also provided below in **Figures 14** and **15**.



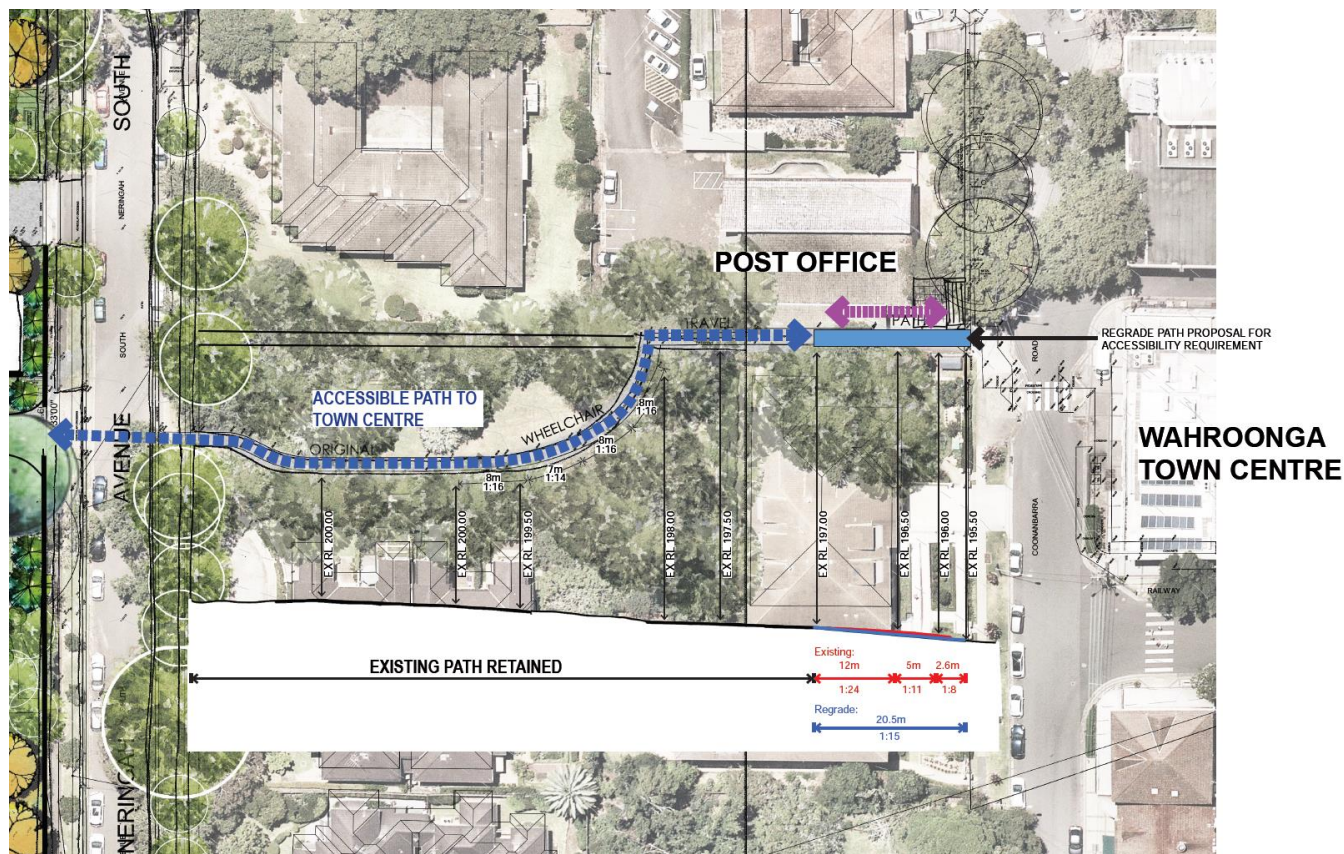
**Figure 14** Extract of concept landscape design

Source: Taylor Brammer Landscape Architects

### 3.3 Public Domain Works

To ensure compliance with the relevant provisions of Clause 26 of the Seniors Housing SEPP relating to 'suitable access pathways,' the development will include the upgrade of the eastern end of 'Archdale Walk' to be compliant with all associated pathway gradient provisions, as this is the primary pathway for residents to access Wahroonga Shopping Village (refer to **Figure 15**). These gradients are also discussed in further detail as part of an assessment of Clause 26 of the Seniors Housing SEPP in **Section 5.3**.





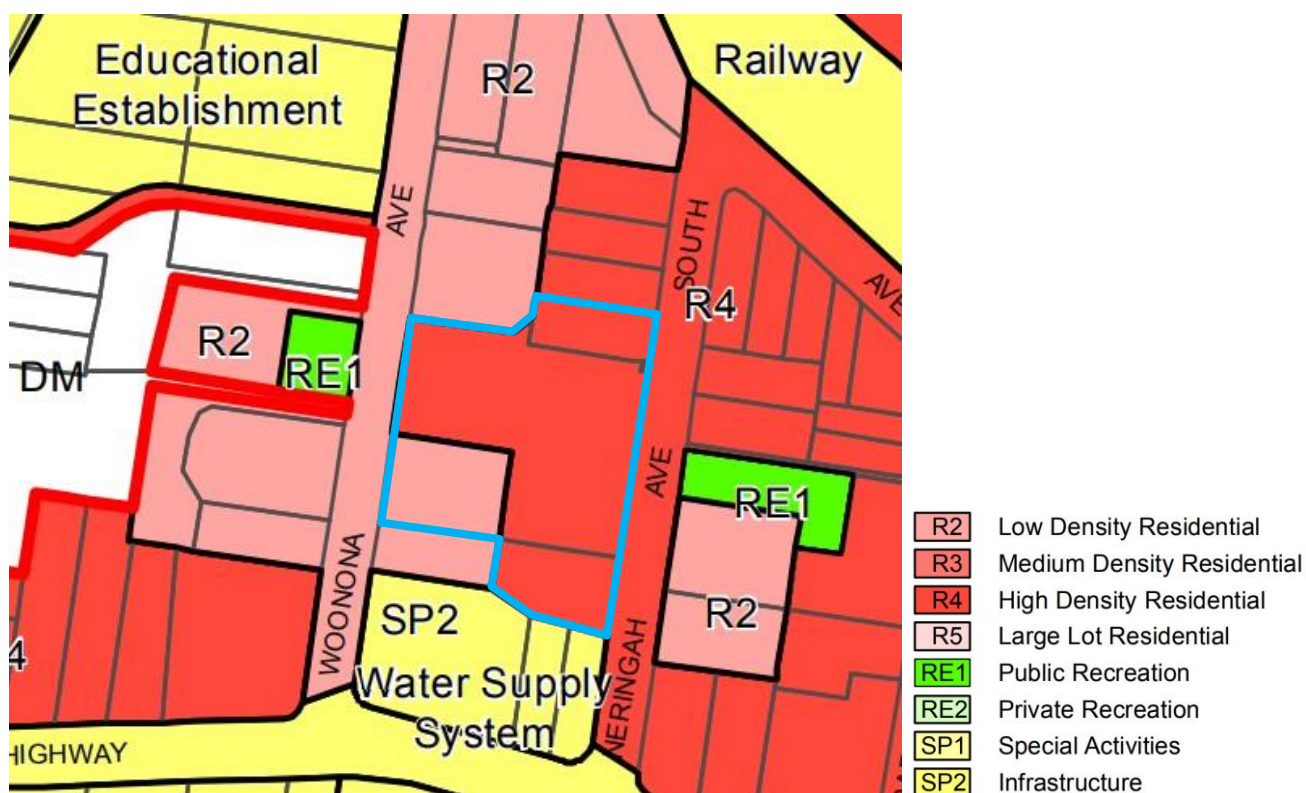
**Figure 15** Extract of pathway upgrade concept

Source: Taylor Brammer Landscape Architects

## 4.0 Relevant Planning Legislation

### 4.1 Ku-ring-gai Local Environmental Plan 2015

The *Ku-ring-gai Local Environmental Plan 2015* (Ku-ring-gai LEP) is the primary Environmental Planning Instrument controlling development on the site. The site is zoned as R4 – High Density Residential under the Ku-ring-gai LEP. A zoning extract is shown at **Figure 16**. It is noted that there is a portion of the site zoned as R2 – Low Density Residential, which contains the local heritage listed ‘Woonona Cottage.’ By virtue of this, this portion of the site is not subject to the future development.



**Figure 16** Extract from the Ku-ring-gai LEP Land Zoning Map

Source: Ku-ring-gai Council and Ethos Urban

The relevant planning considerations under the Ku-ring-gai LEP are listed below in **Table 2**.

**Table 2** Planning considerations under the Ku-ring-gai LEP

Control	Comment	
Clause 2.2 – Land Use Zoning	It is noted that both seniors housing and health service facilities are not permissible within the R4 – High Density Residential. Notwithstanding, the proposal is permissible at the site in accordance with the Seniors Housing SEPP and the Infrastructure SEPP. This is discussed in further in <b>Section 4.3</b> and <b>Section 4.5</b> .	
Clause 2.3 – Zone objectives	The proposal is consistent with the objectives of this zone given that it will provide additional housing types within a high density development environment, on land that is in close proximity to services that meet the day today needs of residents.	
Clause 4.3 – Height of Buildings	Maximum building height of 17.5m	The maximum height of buildings does not exceed 17.5m.
Clause 4.4 – Floor Space Ratio	Maximum FSR of 1.3:1 (1.8:1 pursuant to the Seniors Housing SEPP)	The proposed FSR is 1.6:1, which is compliant with the provisions of the Seniors Housing SEPP. Refer to <b>Section 5.1</b> .



## 4.2 Ku-ring-gai Development Control Plan 2015

**Table 3** below provides a summary of the key built form controls applying to the site according to the Ku-ring-gai Development Control Plan 2015. It is noted that the DCP controls are for residential flat buildings (RFB's) as there are no controls that specifically relate to seniors housing or the subject site. Accordingly, the controls do not strictly apply to seniors housing development, however, have been used as guidance for built form and massing envelopes which demonstrates the compatibility of the proposal with the desired character of the area. A further analysis of the proposal's built form and massing is provided in **Section 6.1**.

**Table 3 Summary of key built form controls according to the Ku-ring-gai Development Control Plan 2015**

Control	Comment
<b>Building Setbacks</b>	
<b>Street frontage</b> <ul style="list-style-type: none"> <li>10m from street boundary.</li> <li>A further 2m articulation zone behind the street setback is to be provided with a max. 40% of this zone to be occupied by the building.</li> </ul>	The proposed massing largely complies with this control. It is noted that a small portion of the Northern building will have a <10m street frontage which is consistent with the existing hospital building at this part of the site.
<b>Side setback</b> <ul style="list-style-type: none"> <li>6m for all levels up to the fourth storey, 9m to the fifth storey and above.</li> <li>Driveways are to be set back 6m from the side boundary within the street setback.</li> </ul>	The proposed massing complies with these side setback controls as shown on the indicative concept scheme at <b>Appendix A</b> and the proposal will utilise existing driveways for vehicular access.
<b>Side and rear setback where adjoining land which is zoned differently for lower density residential development</b> <ul style="list-style-type: none"> <li>9m up to the fourth storey, 12m for the fifth storey and above (applies to boundary adjoining R2 zoned land)</li> </ul>	A small portion of the site adjoins R2 zoned land in the North western corner of the site and the future development application will demonstrate how the proposal responds to this interface. The indicative building envelopes step the building mass away from this interface at Level 1 and again at Level 3 so that it is no closer to the neighbouring property than the existing residential care facility.
<b>Adjoining a heritage item</b> <ul style="list-style-type: none"> <li>Minimum 12m separation between the buildings of the Heritage Item and the development</li> <li>Development with building mass above 8m high is to be stepped back a further 6m from the Heritage Item</li> </ul>	The proposed massing responds to the adjacent heritage items, Woonona Cottage and the Sydney Water Reservoir, through increased building setbacks up to 12m (with further separation provided at upper levels). <b>Section 6.2</b> below and the Heritage Impact Statement provided at <b>Appendix D</b> includes further detail on the proposal's response to surrounding heritage amenity.
<b>Building Separation</b> <ul style="list-style-type: none"> <li>12m between habitable rooms/balconies up to 4 storeys</li> </ul>	The North building will provide a minimum 8m separation zone to the Wahroonga building, however, the massing provides for at least 12m separation between habitable rooms as shown in the following plan extracts.



Control	Comment
	  <p>Ground</p> <p>Level 1</p>
<b>Building storeys</b> <b>Maximum number of storeys for the site is five (based on the LEP height limit of 17.5m).</b>	Each building will contain a maximum 5 storeys at any one point of the site.
<b>Deep Soil</b> <ul style="list-style-type: none"> <li>The minimum deep soil area is 50% of the site (for sites larger than 1,800m<sup>2</sup>).</li> </ul>	<p>Approximately 29% of the site will comprise deep soil landscaping which is considered appropriate for a seniors housing development and when compared to the ADG which requires a minimum of 15% deep soil area. It is also noted that pursuant to Clause 50 of the Seniors Housing SEPP, a consent authority cannot refuse consent to an application made for self-contained dwellings where the deep soil zone is at least 15% of the total site area.</p> <p>The development also seeks to retain significant trees and provides opportunities for additional vegetation, as shown on the Concept Landscape Plan at <b>Appendix B</b>.</p>

#### 4.3 State Environmental Planning Policy (Infrastructure) 2007

Clause 57 of the Infrastructure SEPP relates to the development of health services facilities. It identifies that health services facilities are permissible with consent in a number of prescribed zones:

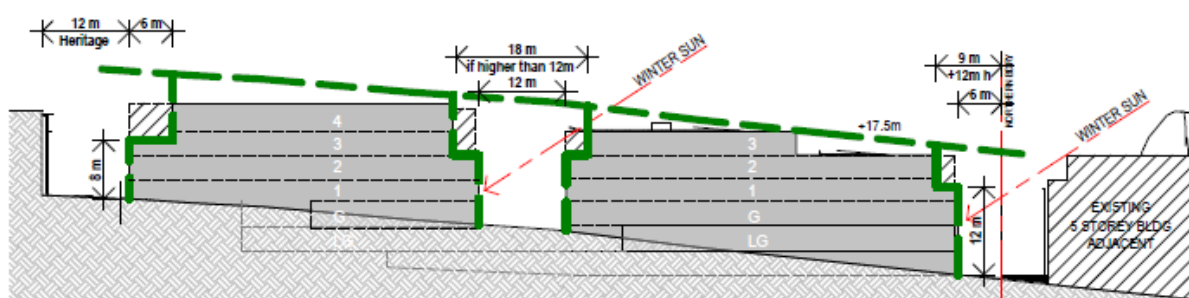
*57 Development permitted with consent*

*(1) Development for the purpose of **health services facilities** may be carried out by any person with consent on land in a prescribed zone.*

One of these prescribed zones is R4 – High Density Residential, meaning that health services facilities are able to be developed on the site by any person with consent. Since part of this proposal includes 18 palliative care beds, and health services facilities are prohibited under the Ku-ring-gai LEP framework, this aspect of the development will be pursued in accordance with the provisions of the Infrastructure SEPP as part of a future DA. It is noted that as the use is not a use listed at Clause 57(2)(b) of the SEPP, a Site Compatibility Certificate pursuant to provision (3) of the Clause is not required. Irrespective, it is noted that the relevant part of the site is already used for palliative care beds and this proposal will simply replace and upgrade these facilities.

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

The design principles as set out in the *State Environmental Planning Policy No. 65 – Design Quality of Residential Apartment Development* (SEPP 65) have been considered in the development of the indicative concept for the self-contained dwellings and a SEPP 65 Report will be submitted as part of a future DA submission to Ku-ring-gai Council. This report will consider the consistency of the proposal in respect of the self-contained dwellings with the key considerations of the Apartment Design Guide (ADG), with particular reference to factors such as solar access and cross ventilation. It is noted that the proposed massing of the indicative concept sets up the development to achieve high levels of internal amenity through careful consideration of building orientation, separation and slope (as demonstrated at **Figure 17**).



**Figure 17** Section of indicative building massing

Source BMA

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

### 4.5.1 Application of Seniors Housing SEPP

Clause 4(1) of the Seniors Housing SEPP identifies land to which the SEPP applies, being land within NSW that is zoned primarily for urban purposes, but only if:

- (a) *development for the purpose of any of the following is permitted on the land—*
  - (i) *dwelling-houses,*
  - (ii) ***residential flat buildings,***
  - (iii) *hospitals,*
  - (iv) *development of a kind identified in respect of land zoned as special uses, including (but not limited to) churches, convents, educational establishments, schools and seminaries, or*

The site's R4 zoning permits residential flat buildings, and as such the provisions of the SEPP apply.

Clause 45(1) of the Seniors Housing SEPP identifies land to which the 'Vertical Villages' provisions apply, being land on which development for the purposes of residential flat buildings is permitted. As such, the Site is able to pursue the floor space bonus associated with this clause via a Site Compatibility Certificate (refer to **Section 5.1**).

### 4.5.2 Requirements for a Site Compatibility Certificate

Clause 24 of the Seniors Housing SEPP applies to a DA made for the purpose of seniors housing which involves buildings having a floor space ratio that would require the consent authority to grant consent under Clause 45 'Vertical Villages.' Clause 24(2) outlines that a consent authority must not consent to a DA to which Clause 24 applies unless it is satisfied that the relevant panel (in this case the Sydney North Planning Panel) has certified in a current Site Compatibility Certificate that, in their opinion:

- (a) *the site of the proposed development **is suitable for more intensive development**, and*
- (b) *development for the purposes of seniors housing of the kind proposed in the development application is compatible with the surrounding environment having regard to (at least) the criteria specified in clause 25 (5) (b).*

Accordingly, this SCC application has been prepared to demonstrate that the Site is suitable for more intensive development, and that the proposal is compatible with the surrounding land uses. The proposed concept, pending the issuing of an SCC, will form the basis of a future DA to Ku-ring-gai Council.

Clause 25(5)(a)-(b) of the Seniors Housing SEPP lists criteria for the consideration of the Panel prior to issuing an SCC. This criteria is addressed in **Section 5.2** of this report.

Clause 25 (6) also states that the relevant panel may refuse to issue a SCC if it considers that the development is likely to have an adverse effect on the environment. The proposed concept will not have an adverse effect on the environment, as outlined throughout this report, and also specifically addressed in **Section 5.2**.

#### **4.5.3 Consistency with Aims of the Seniors Housing SEPP**

Clause 2(1) of the Seniors Housing SEPP identifies the following aims of the policy. It states as follows:

- (1) This Policy aims to encourage the provision of housing (including residential care facilities) that will—*
- (a) increase the supply and diversity of residences that meet the needs of seniors or people with a disability, and*
  - (b) make efficient use of existing infrastructure and services, and*
  - (c) be of good design.*

The Seniors Housing SEPP identifies a number of means to achieve these objectives, which are contained in the subsequent Clause 2(2). Specifically,

- (2) These aims will be achieved by—*
- (a) 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, and*
  - (b) setting out design principles that should be followed to achieve built form that responds to the characteristics of its site and form, and*
  - (c) ensuring that applicants provide support services for seniors or people with a disability for developments on land adjoining land zoned primarily for urban purposes.*

The subject proposal of this SCC application is consistent with the aims of the Seniors Housing SEPP as it:

- Provides flexibility in the application of the applicable FSR standard for the site to provide for additional housing for seniors and/or people with disabilities;
- Provides for an additional 60 self-contained dwellings and 9 residential aged care rooms on site, thereby increasing the current supply and diversity of seniors housing typologies which will meet the future demands in the Ku-ring-gai LGA;
- Will revitalise the existing palliative care services currently provided as part of Neringah Hospital; and
- The proposed concept demonstrates a design led solution to the site which is capable of accommodating the proposed scale of development.

Accordingly, through the application of the Vertical Villages floor space, this application will facilitate a development which increases the supply and diversity of seniors housing (and associated health care services), makes efficient use of existing infrastructure (both on site and external) and is capable of achieving a high standard of design.



## 5.0 Statement on Compatibility Criteria

This section of the report provides a Statement of Compatibility demonstrating the Site's suitability for more intensive development, having particular regard to the matters for consideration in Clauses 45, 25 and 26 of the Seniors Housing SEPP.

### 5.1 Clause 45 Criteria (Seniors Housing SEPP)

Clause 45 of the Seniors SEPP provides for up to an additional 0.5:1 FSR on top of the base FSR for the site of 1.3:1 under the Ku-ring-gai LEP 2015. This means that subject to the development meeting the requirements of Clause 45, a maximum FSR of 1.8:1 is available for the site. As outlined in **Section 6.1**, a design led approach to the site has resulted in this development pursuing a FSR of approximately 1.6:1.

Clause 45 requires that a consent authority may only grant consent to a development application made pursuant to this chapter if:

(...)

- (i) *the proposed development will **deliver on-site support services** for its residents, and*
- (ii) *at least **10% of the dwellings** for the accommodation of residents in the proposed development **will be affordable places**, and*

*(b) the applicant identifies, to the satisfaction of the consent authority, which of the dwellings for the accommodation of residents in the proposed development will be set aside as affordable places.*

The Seniors Housing SEPP defines 'on-site support services' as:

*on-site support services, in relation to residents of seniors housing, means—*

- (a) 3 meals a day provided on a communal basis or to a resident's dwelling, and*
- (b) personal care, and*
- (c) home nursing visits, and*
- (d) assistance with housework.*

HammondCare will make all the aforementioned on-site support services available to residents as required. HammondCare is also a registered charity which specialises in providing health care services to the elderly and those that are financially disadvantaged. Of note, across HammondCare's facilities:

- 45% of aged care recipients are low income or disadvantaged;
- 50% of inpatients and outpatients are public patients; and
- 15% of seniors living residents benefit from affordable options.


As part of the future DA, HammondCare will designate at least 10% of the self-contained dwellings to be affordable places, in line with their charitable vision to provide health care services to people irrespective of their financial situation. The location of each of the 'affordable' self-contained dwellings within the proposed development will be detailed as part of a future DA to Ku-ring-gai Council.

As such, the proposal demonstrates that each of the criteria required in accordance with Clause 45 is capable of being complied with.

### 5.2 Clause 25 Criteria (Seniors Housing SEPP)

Clause 25(5)(b) of the Seniors Housing SEPP requires that a Site Compatibility Certificate must not be issued unless it is demonstrated that the proposed development is compatible with the surrounding land uses having regard to (at least) the criteria outlined within Clause 25. **Table 4** provides a response to each criterion in Clause 25(5)(b), demonstrating the proposal's consistency with this Clause of the SEPP.

**Table 4 Assessment of the proposal against Seniors Housing SEPP Clause 25(5)(b)**

Clause 25(5)(b) criteria	Assessment for the proposed concept
<p>(i) 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,</p>	<p>There are no known environmental hazards that would preclude development pursuant to the Seniors Housing SEPP. It is noted that the site is not identified as either flood or bushfire prone land under the Ku-ring-gai LEP. An assessment of contamination in accordance with the requirements of SEPP 55 will be undertaken for the DA, however, the site is currently used for the purposes of seniors housing and a hospital and therefore the ongoing use of the site for these purposes is appropriate.</p> <p>The proposed setbacks from Neringah Avenue South, adjoining properties and heritage items will also facilitate extensive tree planting and landscaping around the proposed buildings, which will serve a dual function of creating a visual buffer between the proposed development and surrounding dwellings, as well as complement the existing bushland canopy that occupies the streets in the surrounding area.</p> <p>As detailed in the Architectural Plans, 3 trees are proposed to be removed in the Southern portion of the site, in the location of the future South building. Notwithstanding this, it is noted that this removal is simply reflective of normal development processes and is not linked to the additional floor space sought as part of this proposal, with the overall impact on the natural environment being negligible, particularly when considering the extensive tree planting that is proposed which will act to offset this.</p> <p>It is also noted that a small portion of the Northeastern corner of the site is mapped as containing significant vegetation (refer below image) according to Ku-ring-gai Council. Accordingly, the indicative development scheme has been designed so as to facilitate the retention and integration of this vegetation into the development's landscape design. Significant trees in this area will be retained, with there being no associated impact on the natural environment.</p>  <p>As well as this, the provision of a 'green spine' between the two proposed buildings will enhance the scenic appearance of the site as it will act to further integrate with the surrounding bushland, as well as provide a functional through site link that will not be secured.</p> <p>The concept landscape design provided at <b>Appendix B</b> details these landscaping considerations in further detail.</p>
<p>(ii) the impact that the proposed development is likely to have on the uses that, in the opinion of the relevant panel, are likely to be the future uses of that land,</p>	<p>It is noted that the site has been used for hospital and seniors living purposes since 1955, and as aforementioned, Neringah Hospital is a Schedule 3 health services facility, being part of the public health system, and is therefore an integral part of Northern Sydney's health system. As such, the proposal to revitalise and expand the existing facilities on site will not have an impact on the future uses of the site.</p>

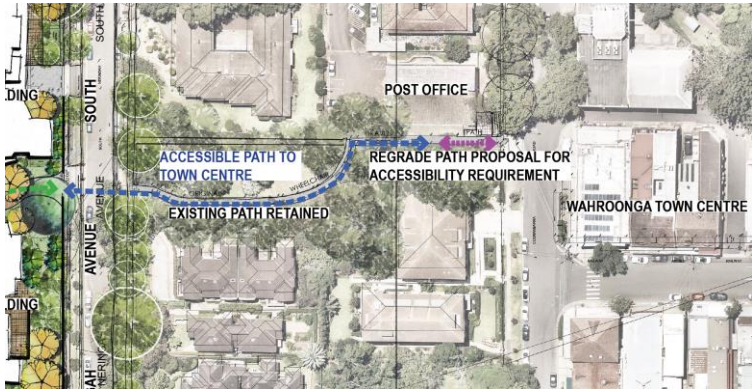
Clause 25(5)(b) criteria	Assessment for the proposed concept
	As well as this, the proposed development is compatible with the future use of neighbouring land by virtue of its compliance with key development standards such as height and number of storeys, as well as its consistency with the growing trend of additional higher density development occurring in the surrounding locality. As such, the proposal is not anticipated to impact upon the future of the area as a high density residential development neighbourhood.
<i>(iii) the services and infrastructure that are or will be available to meet the demands arising from the proposed development (particularly, retail, community, medical and transport services having regard to the location and access requirements set out in clause 26) and any proposed financial arrangements for infrastructure provision,</i>	<p>The site is located approximately 200m away from Wahroonga Shopping Village, which contains a variety of services in accordance with the requirements identified by Clause 26 of the Seniors Housing SEPP. This is discussed in further detail below in <b>Section 5.3</b>. Wahroonga Train Station is also located approximately 350m away which provides direct access to destinations along the North Shore Rail Line including Hornsby, Chatswood and North Sydney.</p> <p>It is also noted that as a result of the site's existing use, it has access to all necessary services including electrical, gas, water and telecommunications, which can be augmented as required to accommodate the proposal.</p>
<i>(iv) in the case of applications 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 and special uses in the vicinity of the development,</i>	<p>The site is zoned R4 – High Density Residential with immediately adjacent properties being zoned as either R4 or R2 – Low Density Residential. The Reservoir to the South of the site is zoned as SP2 – Infrastructure, however the proposal is not anticipated to have any impact on the reservoir by virtue of the proposed development being appropriately set back from the shared boundary and the land use of the site remaining as it currently operates.</p> <p>The proposed development is considered to have a positive impact on the open space to the east and west of the site due to the through-site link which will improve connectivity to these parks (as well as upgrading Archdale Walk for equitable access). It is noted that the development will not result in any adverse impacts such as overshadowing to these parks.</p>
<i>(v) 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,</i>	It is reiterated that the proposal is a design led solution that has been initiated to simultaneously revitalise the existing hospital and aged care facilities on site as well as deliver a development outcome that integrates with both the existing and future built form character of the surrounding locality. An assessment of the key built form considerations is provided below in <b>Section 6.1</b> .
<i>(vi) if the development may involve the clearing of native vegetation that is subject to the requirements of section 12 of the Native Vegetation Act 2003—the impact that the proposed development is likely to have on the conservation and management of native vegetation,</i>	The Vegetation Act 2003 was repealed in August 2017 and replaced by the Biodiversity Conservation Act 2016. The development will not result in any clearing of significant vegetation that would trigger an assessment under this Act.
<i>(vii) the impacts identified in any cumulative impact study provided in connection with the application for the certificate, and</i>	At the time of preparing this SCC application, there are no other site compatibility certificate applications within a one kilometre radius of the subject site. As such, no further consideration is required for this clause.

### 5.3 Clause 26 Criteria (Seniors Housing SEPP)

Clause 26 of the Seniors Housing SEPP requires that a consent authority not consent to a DA for seniors housing unless it is satisfied that residents of the proposed development will have access that complies with a number of requirements in subclause (2). An assessment of the proposed concept's compliance with the requirements of Clause 26(2) is provided in **Table 5** below.

**Table 5 Assessment of Proposal against Seniors Housing SEPP Clause 26(2)**

Clause 26 Criteria	Assessment for the proposed concept
<i>(1) A consent authority must not consent to a development application made pursuant to this Chapter unless the consent authority is satisfied, by written evidence, that residents of the</i>	<p>The Site has adequate access to all aforementioned services, which are all located in Wahroonga Shopping Village. Of note, the following key services are accessible:</p> <ul style="list-style-type: none"> <li>Shops such as retail, supermarket, post office, take away restaurants, cafes, legal services.</li> </ul>

Clause 26 Criteria	Assessment for the proposed concept
<p><i>proposed development will have access that complies with subclause (2) to—</i></p> <p><i>(a) shops, bank service providers and other retail and commercial services that residents may reasonably require, and</i></p> <p><i>(b) community services and recreation facilities, and</i></p> <p><i>(c) the practice of a general medical practitioner.</i></p>	<ul style="list-style-type: none"> <li>• Bank services including a Westpac and Commonwealth Bank branch.</li> <li>• General Practitioner, dentist and physiotherapy services.</li> </ul> <p>It is also noted that a variety of services will be provided on site, including medical services as part of Neringah Hospital as well as recreational facilities.</p> <p>Further to these services, Wahroonga Train Station is also located adjacent to the shopping village, connecting the site with key commercial centres across metropolitan Sydney.</p>
<p><i>(2)(a) the facilities and services referred to in subclause (1) are located at a distance of not more than 400 metres from the site of the proposed development that is a distance accessible by means of a suitable access pathway and the overall average gradient for the pathway is no more than 1:14, although the following gradients along the pathway are also acceptable—</i></p> <p><i>(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,</i></p> <p><i>(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,</i></p> <p><i>(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time,</i></p>	<p>As is detailed in the concept landscape design, a small section of 'Archdale Walk' – the primary pedestrian pathway between the site and Wahroonga shopping village, is non-compliant with the aforementioned gradient provision, having a gradient of 1:8 for a length of 2.6m.</p> <p>As a result, the future development will upgrade this section of the pathway to be compliant with the relevant gradient provisions. At this stage of the design process, the identified option is to extend and regrade the Eastern end of the ramp to minimise the gradient and ensure the entire pathway is compliant (as shown below).</p> <p>It is proposed that this outcome would be facilitated by a condition of consent of the future DA to Ku-ring-gai Council.</p> 
<p><i>(b) in the case of a proposed development on land in a local government area within the Greater Sydney (Greater Capital City Statistical Area)—there is a public transport service available to the residents who will occupy the proposed development—</i></p> <p><i>(i) that is located at a distance of not more than 400 metres from the site of the proposed development and the distance is accessible by means of a suitable access pathway, and</i></p> <p><i>(ii) that will take those residents to a place that is located at a distance of not more than 400 metres from the facilities and services referred to in subclause (1), and</i></p> <p><i>(iii) that is available both to and from the proposed development at least once between 8am and 12pm per day and at least once between 12pm and 6pm each day from Monday to Friday (both days inclusive),</i></p> <p><i>and the gradient along the pathway from the site to the public transport services (and from the public transport services to the facilities and services referred to in subclause (1)) complies with subclause (3),</i></p>	<p>As noted previously, Wahroonga Train Station is located approximately 350m away adjacent to Wahroonga Shopping Village, and it is also noted that upgrade works are currently being carried out at the station which include the provision of an accessible lift from the overpass to the platforms. This will further improve accessibility of the site to the broader Sydney region.</p>

Clause 26 Criteria	Assessment for the proposed concept
<p>(3) For the purposes of subclause (2) (b) and (c), the overall average gradient along a pathway from the site of the proposed development to the public transport services (and from the transport services to the facilities and services referred to in subclause (1)) is to be no more than 1:14, although the following gradients along the pathway are also acceptable—</p> <p>(i) a gradient of no more than 1:12 for slopes for a maximum of 15 metres at a time,</p> <p>(ii) a gradient of no more than 1:10 for a maximum length of 5 metres at a time,</p> <p>(iii) a gradient of no more than 1:8 for distances of no more than 1.5 metres at a time.</p>	<p>The facilities referred to in Subclause (1) are within 400m of the site itself.</p> <p>As such, an access compliance analysis in relation to subclauses (2) and (3) is not required for the purposes of demonstrating compliance with Clause 26.</p>

#### 5.4 Clause 27 Criteria (Seniors Housing SEPP)

Clause 27 of the Seniors Housing SEPP provides for seniors housing developments in bushfire prone land. The site is not mapped as being bushfire prone by Ku-ring-gai Council, and as such, a consent authority can grant consent to a seniors housing development on the land.

#### 5.5 Clause 28 Criteria (Seniors Housing SEPP)

Clause 28 of the Seniors Housing SEPP details provisions in regards to ensuring that all seniors housing will be appropriately serviced by drinking and waste water infrastructure. Given the existing use of the site will remain as is, adequate water infrastructure will continue to be provided on site, and can be augmented as required to accommodate the proposal.

#### 5.6 Summary

In accordance with the analysis provided in **Section 5.2** and **5.3**, the proposal is considered to be compatible with the site's characteristics and the surrounding locality given that:

- The development will provide an appropriate level of on-site support services and affordable dwellings in accordance with Clause 45 of the Seniors Housing SEPP.
- The proposal's design led solution with respect to the massing (refer to **Section 6.1**), bulk and scale of the buildings will not have any adverse impacts on the natural environment, heritage amenity or the current and future character of the surrounding locality, in accordance with Clause 25 of the Seniors Housing SEPP.
- Through a future condition of consent, the development will provide appropriate access to services in a manner consistent with Clause 26 of the Seniors Housing SEPP, thus satisfying all relevant criteria in relation to access and services.
- The Site is not bushfire prone (Clause 27) and has ready access to all required services (Clause 28).



## 6.0 Key Assessment Matters

Key assessment matters are discussed in further detail in the sections below. A more detailed analysis of the key considerations of Clause 25(5)(b)(v) of the Seniors Housing SEPP is also provided in **Section 6.1**.

### 6.1 Built Form

The proposed massing is the result of a design led solution that has been developed to simultaneously revitalise the existing facilities on site, as well as deliver a development outcome that integrates with both the existing and future built form character of the surrounding locality.

Importantly, the scale of the development has been derived from a detailed site analysis of its opportunities and constraints, rather than a numeric FSR standard. This is evident from the BMA concept scheme package included at **Appendix A** and the fact that the proposal does not seek to simply maximise the FSR of the development, rather it proposes a FSR of approximately 1:1.6 out of a maximum available FSR of 1:1.8. Accordingly, the proposal achieves the design principles specified in Division 2 of the Seniors Housing SEPP as outlined in detail below.

There is also a substantial need for additional seniors housing in the northern Sydney region where the number of people aged 65 or older is expected to increase to 18% (approximately 1.3 million people) of the population and the need for specialist dementia care is estimated to double in NSW by 2051. At the current occupancy of 5% of 65+ residents in seniors housing, the projected ageing population equates to demand for an additional 65,000 new aged care spaces in the next 10 years. This proposal seeks to address some of this demand by increasing the quantum and range of seniors housing accommodation provided at a site which has a demonstrated ability to accommodate it.

Principally, Clause 33 of Division 2 of the Seniors Housing SEPP details the following built form considerations:

**Table 6 Clause 33 Considerations**

Criteria	Assessment
<b>33 Neighbourhood amenity and streetscape</b>	
<i>The proposed development should—</i> <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 proposal is consistent with the scale of the R4 High Density Residential zoning of the site and responds to the landscaped character of the area through generous landscaped setbacks and a through-site link. In this regard, the indicative concept establishes the framework for the future buildings and landscaping to contribute to the quality and identity of the area.
<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, and</i>	Refer to <b>Section 6.2</b> below. The development has been designed in consideration of the surrounding 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>	Refer to <b>Section 6.1.1</b> below.
<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>	The predominant massing of the site is setback in accordance with the DCP controls and the existing RFB to the north of the site. A minor component of the Northern building has a reduced setback which reflects the existing footprint of the Neringah Hospital building and aligns with the heritage listed Sydney Water Reservoir to the South and is therefore in sympathy with its context.
<i>(e) embody planting that is in sympathy with, but not necessarily the same as, other planting in the streetscape, and</i>	A Concept Landscape Plan has been prepared to demonstrate how the landscape design will integrate with planting in the



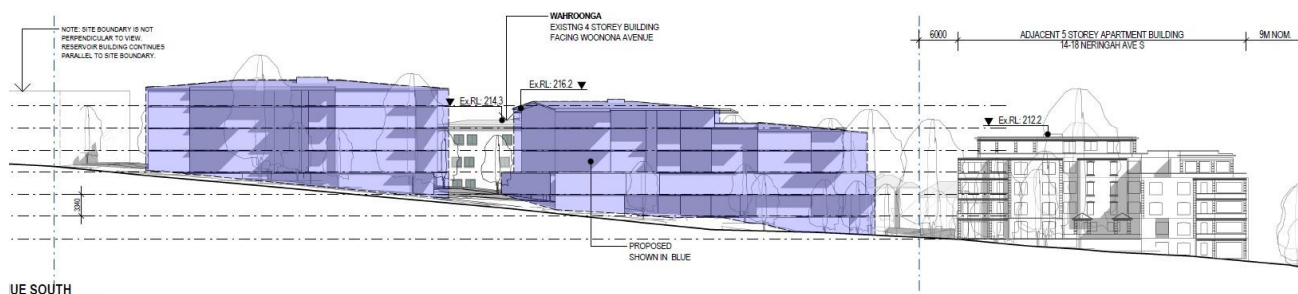
Criteria	Assessment
	streetscape. The proposal seeks to retain existing significant trees and embellish these with additional new plantings.
(f) retain, wherever reasonable, major existing trees, and	The proposed massing has been situated to avoid significant trees. This will be further detailed as part of the future DA.
(g) be designed so that no building is constructed in a riparian zone.	No building is proposed within a riparian zone.

### 6.1.1 Clause 33(c)

As detailed in **Section 3.0** and **Section 4.0**, the proposal's setbacks have been designed to generally comply with the provisions of the Ku-ring-gai DCP's RFB controls, to reflect the predominant surrounding land use of the area. The proposed massing is also compliant with the LEP height control of 17.5m (noting the Seniors SEPP definition of height) and the 5 storey height control of the DCP. This ensures that the development is in-keeping with the scale and character of the surrounding area and provides sufficient building separation to mitigate impacts such as privacy and over shadowing.

An extract of the Neringah Avenue elevation plan is provided below in **Figure 18** which highlights the proposal's consideration of surrounding development character, principally, the adjacent residential flat building known as 'The Sirius' and the heritage listed Sydney Water Reservoir. The elevation demonstrates that the proposed massing will sit comfortably within the existing streetscape and character of the area. The proposed massing has been designed and articulated to create a built form that corresponds with the natural topography of the site and concentrates the massing in the centre of the site, where it has the least impact on surrounding developments. The north facing slope of the site has also been used to maximise internal solar access for the future seniors housing.

The provision of a publicly accessible green spine and through site link between the two proposed buildings will also provide public benefit in the form of visual and physical connectivity with the surrounding area, as well as act to minimise the visual bulk and scale of the development when viewed from the public domain.



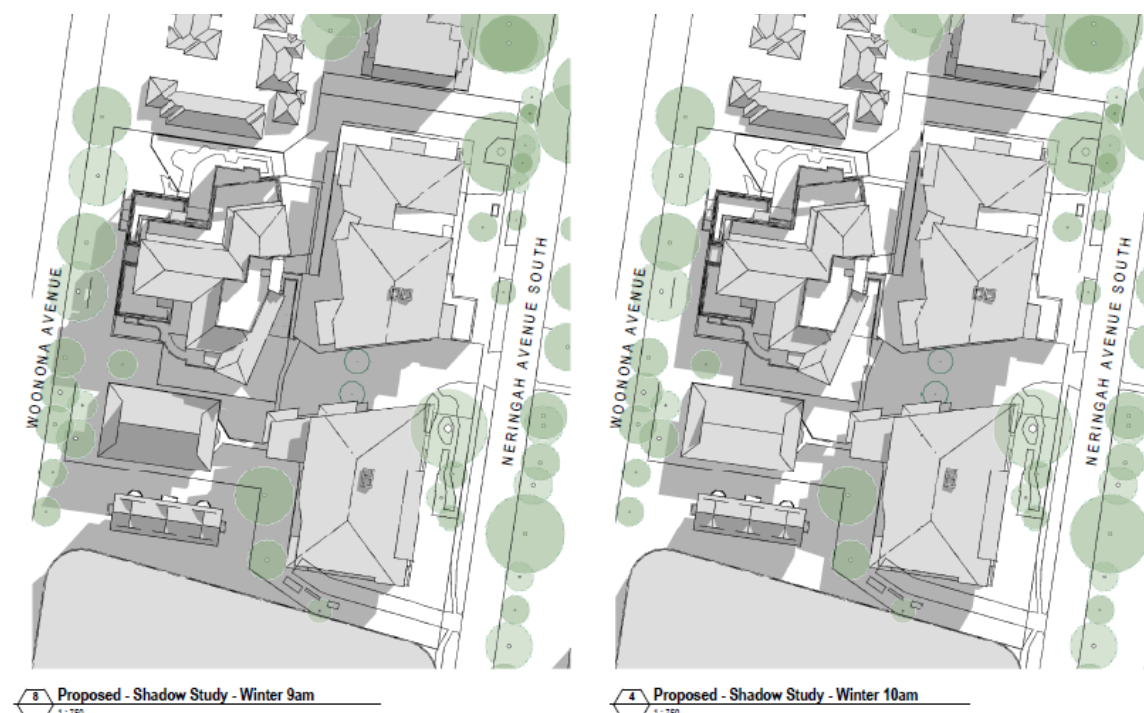
**Figure 18** Extract from the elevations diagram

Source: Bickerton Masters

### Solar Access

In respect to solar access, shadowing diagrams depicting both existing and proposed shadow impacts are included in the architectural plans package (**Appendix A**) which demonstrate that the shadowing is largely confined to existing buildings and other areas of the site. There will be no significant shadowing to surrounding residential properties to the east or west, nor areas of open space.

Whilst it is acknowledged that there will be some shadowing impacts to the adjoining residential dwelling at 1 Woonona Avenue, these impacts only occur in the early morning, and shortly after 10am there will no additional impact caused by the proposed built form (refer to **Figure 19**). Furthermore, it is noted that this shadowing is not driven by the proposal's additional floor space and is simply reflective of the inevitable shadowing that would occur as a result of any adjacent development.



**Figure 19** Extract of shadow diagrams

Source: Bickerton Masters

## Privacy

Privacy for adjoining development, particularly to the North, will be achieved with appropriate building setbacks (in accordance with the guidance of the ADG and DCP) and landscaping that provides screening at property boundaries. As is detailed in the Concept Landscape Design at **Appendix B**, two large trees will be planted at the interface between the site and the townhouses at 15-17 Woonona Avenue, which will create screening between these two developments. It is considered that this will result in an enhanced outcome to the current privacy screening between 15-17 Woonona Avenue and the existing Wahroonga building. Privacy will also be provided to 1 Woonona Avenue by virtue of existing and proposed vegetation at the interface between the South building and the property boundary. Furthermore, the future design of the buildings will seek to maintain privacy through treatments such as orientation of dwellings and offsetting windows.

## Conclusion on Built Form

As such, the built form of the proposal has been specifically designed to maintain high levels of neighbourhood amenity and residential character by virtue of due consideration of applicable planning controls as well as appropriate measures to mitigate the perception of building bulk and scale. Accordingly, the proposal is consistent with the provisions of Clause 33(c) of the Seniors Housing SEPP.

## 6.2 Heritage

### 6.2.1 'Woonona Cottage'

Due to the existence of a local heritage item on site and the adjacent heritage listed Sydney Water Reservoir, a Heritage Impact Statement (HIS) has been prepared by NBR Architecture and is provided at **Appendix D**. It is noted that the siting, arrangement and articulation of each of the proposed buildings has been specifically designed with consideration to the site to ensure the proposed massing responds appropriately to this heritage interface.

The HIS acknowledges that the proposed development does not involve any internal or external alterations to Woonona Cottage, and that the positioning of the South building to the eastern portion of the site will not detract from the architectural fabric, form and character of Woonona Cottage. The inclusion of a landscaped interface within the setback between the Cottage and South building, which is compliant with the Ku-ring-gai DCP controls, will also create a visual buffer between the developments. Additionally, the siting of the proposal at the rear of the Cottage will ensure that primary views of the front façade will not be impacted.

The statement also notes that the proposed through site link will increase pedestrian movement within the site, and its function as both a physical and visual buffer will ensure that Woonona Cottage will remain visible to and from other areas of the site.

Principally, with respect to the proposed increase in permissible FSR, the statement details that this will be acceptable from a heritage perspective, as the development's design led consideration of other key built form characteristics such as height, setbacks and landscaping will deliver an outcome whereby the curtilage, setting and views of the cottage are retained.

### 6.2.2 Surrounding heritage items

The HIS also provides an assessment of surrounding heritage items, including the Sydney Water Reservoir, as well as two residential dwellings on Woonona Avenue known as 'The Briars' House and 'Warrina' House. Overall, the statement concludes that the proposed development will not have any impact on views to these items, nor their legibility in the surrounding context, by virtue of their separation from the subject site and the proposal's design led built form solution.

Accordingly, the proposal's additional floor space will not hinder its ability to present a development outcome that is sympathetic to the heritage character of Woonona Cottage as well as surrounding heritage items and will continue to provide a high quality built form outcome compatible with this setting.

## 6.3 Traffic and Parking

The traffic and parking assessment prepared by McLaren Traffic Engineering (provided at **Appendix C**) concludes that the proposed development will not have an adverse effect on any nearby intersections and can be readily accommodated within the existing road network, with minimal impacts expected in terms of traffic flow efficiency, residential amenity and road safety. Principally, the assessment notes that the level of service at surrounding intersections will not be altered as a result of the proposal, with the road network continuing to operate at a high level of service.

With respect to parking, the assessment details that compliance with Council's DCP requirements would require 82 parking spaces. It is noted that the proposal includes 90 spaces, and as such the requirement is satisfied. Notwithstanding this, Clause 50 of the Seniors Housing SEPP details standards that cannot be used to refuse consent, including the following:

*(h) **parking:** if at least the following is provided—*

*(i) 0.5 car spaces for each bedroom where the development application is made by a person other than a social housing provider, or*

*(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.*

According to this metric, the proposal is only required to provide 33 parking spaces and 1 ambulance space. The proposal is therefore not limited by its ability to provide adequate parking, in accordance with both DCP and SEPP provisions.

As such, it can be concluded that the additional FSR sought as part of this SCC application will not give rise to any adverse traffic or parking impacts.

## **6.4 Site suitability and the public interest**

The site's existing use as a residential aged care facility and Schedule 3 hospital results in the site remaining suitable for the proposed upgraded and expanded facilities. As well as this, the proposal's well informed design will integrate with the surrounding built form, resulting in a development outcome that mitigates any adverse environmental impacts and will contribute positively to the surrounding locality.

As supported by the consultant reports appended to this application, the proposal will result in the following community benefits to both future intended occupants as well as surrounding residents:

- Provision of an increased supply and diversity of accommodation that meets the needs of seniors and/or people with a disability;
- Improved facilities and amenities for HammondCare in their pursuit to deliver the best possible aged care and medical services to their patients;
- Improved environmental and connectivity outcomes for the site by virtue of the accessible through site pedestrian link and concept landscape design; and
- A development outcome that will integrate with the neighbouring locality and not give rise to any undue adverse environmental impacts.

## 7.0 Conclusion

This SCC application is submitted to the NSW Department of Planning, Industry and Environment in accordance with the Vertical Village provisions of Clause 45 of the Seniors Housing SEPP. The purpose of the SCC application is to facilitate the preparation of a Development Application for the construction of a seniors housing development with palliative care facilities, which will comprise 2 buildings including approximately 60 self-contained dwellings, 9 residential aged care facility beds and 18 palliative care beds.

This project has been initiated as part of HammondCare's overarching vision to revitalise their existing palliative care facilities at Neringah Hospital, which have reached the end of their usable life and are no longer fit for purpose, as well as providing additional seniors housing to address key demographic trends that are prevalent in northern Sydney. By 2031, the number of people aged 65 or older in northern Sydney is expected to increase to 18% (approximately 1.3 million people) of the population and the need for specialist dementia care is estimated to double in NSW by 2051. At the current occupancy of 5% of 65+ residents in seniors housing, the projected ageing population equates to demand for an additional 65,000 new aged care spaces in the next 10 years. The overarching objective of this project is to provide a range of seniors housing typologies at the site to enable this demographic to continue to live well and maintain independence as they age via access to appropriate support and care.

Having had regard to the environmental assessment contained in this report, and the accompanying technical studies appended, it is considered that the site is evidently suitable for more intensive development than currently provided for by the Ku-ring-gai LEP 2015. A design led approach has been taken to the development which seeks a built form outcome that contextually fits with the surrounding locality, having regard to the existing streetscape, environment and surrounding land uses.

Accordingly, pursuant to Clause 24(2) of the Seniors Housing SEPP, the Panel may be satisfied that:

- The site of the proposed development is suitable for more intensive development; and
- Development for the purposes of seniors housing of the kind proposed in the development application is compatible with the surrounding environment.