

SITE COMPATIBILITY CERTIFICATE

ELANORA COUNTRY CLUB SENIORS
HOUSING



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SA6283
PREPARED FOR ELANORA COUNTRY CLUB



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1. INTRODUCTION

This report supports an application to the NSW Department of Planning and Environment (DPE) for a Site Compatibility Certificate (SCC) under Clause 24 of *State Environmental Planning Policy (Housing For Seniors and People with a Disability) 2004* (the Seniors SEPP).

The application relates to the site of the Elanora Country Club, 154-156 Elanora Rd, Elanora Heights, being legally described as Lot 2 DP538508, Lot 1 DP201384, Lot 8 DP22281 and Lot 145 & 146 DP22670. The site is located within the Northern Beaches Local Government Area.

A SCC is required to be issued by the Minister prior to the lodgement of a DA with a Local Council for seniors housing on land that is zoned primarily for urban purposes upon which specific development types are permissible, including existing registered clubs where the proposed seniors development is not permissible under the relevant environmental planning instrument.

The subject site is zoned RE2 Private Recreation under the Pittwater Local Environmental Plan (LEP) 2014 and prohibits seniors housing in the form of independent living units (or 'self-contained dwellings', namely 'in-fill self-care housing' as they are defined in the Seniors SEPP). Therefore, this SCC application has been made to demonstrate the site is suitable for seniors housing and development consent can be sought for seniors housing.

The site compatibility criteria required to be assessed are addressed in Section 6 of this report, and relate to:

- The natural environment.
- Impacts on the likely future uses of the land.
- Availability of services and infrastructure.
- Impact that the bulk, scale, built form and character of the proposed development is likely to have on the existing, approved or future uses of the land in the vicinity of the development.

In summary, this application seeks certification for the following:

- The use of the site for seniors housing.
- A maximum of 46 seniors independent living units (or self-contained dwellings' as they are defined within the Seniors SEPP.

This SCC application does not seek development consent for the seniors housing development, but rather provides a contextual assessment that confirms that the future development of the site for seniors housing is appropriate. This SCC demonstrates the proposed land use is compatible with the surrounding context and any environmental impacts will be minor and can be appropriately managed. Following the issue of the SCC, a DA will be lodged with Northern Beaches Council seeking consent for the proposed seniors housing development within the parameters assessed and approved by the SCC.

2. SITE AND LOCALITY

2.1. SITE FEATURES AND DETAILS

The site has the following characteristics:

- The Elanora Country Club is located at 154-156 Elanora Road, Elanora Heights NSW 2101.
- The overall site has an area of 56.26 hectares, which comprises mostly of the Elanora Country Club Golf Course (the site area of the proposed Seniors housing is approximately 1.72 hectares).
- The legal description of the site is Lot 2 DP538508, Lot 1 DP201384, Lot 8 DP22281 and Lot 145 & 146 DP22670.
- The site consists of:
 - A two storey clubhouse
 - An 18 hole golf course
 - Two bowling greens
 - Tennis courts
 - At grade car park and surplus land

Figure 1 – The Subject Site



Source: SIX Maps

- The site is located on the periphery of a residential and rural residential area, and is located to the rear of the dwellings on Elanora Road. The northern boundary is adjacent to Wilga Street.
- The site is undulating, with manicured landscaping and vegetation, typical of a golf course.
- The site perimeter is vegetated on all sides, with the Garigal National Park on the southern boundary.
- The site has one vehicle entry and exit point via a single access road off Elanora Road.

Figure 2 – View of the site looking South West.



Source: CM+A

Figure 3 – View of site, looking North.



Source: CM+A

Figure 4 – View looking South East across Narrabeen Lagoon, towards the South Pacific Ocean



Source: CM+A

Figure 5 – Elanora Country Club House



Source: CM+A

Figure 6 – View looking East along the Elanora Country Club access road, with the site on the right.



Source: CM+A

Figure 7 – Entrance to Elanora Country Club, from Elanora Road



Source: TTPP

2.2. LOCAL CONTEXT

The surrounding context is summarised in the table below:

Table 1 – Site Description

Direction	Land Use
North	<ul style="list-style-type: none"> • Directly to the north of the site is Wilga Street, and market gardening / rural residential dwellings. • Further north of the site is the suburb of Ingleside and the Ku-ring-gai Chase National Park.
South	<ul style="list-style-type: none"> • To the south of the golf course is the eastern most portion of the Garigal National Park and Deep Creek, which drains into Narrabeen Lagoon.
East	<ul style="list-style-type: none"> • Directly to the east of the site is the suburb of Elanora Heights, characterised by low density residential dwellings. • Nearby is the Elanora Heights local neighbourhood centre, located near the intersection of Powder Works Road and Kanang Road. • Further to the east is North Narrabeen, which comprises low density residential dwellings, several schools and open space.
West	<ul style="list-style-type: none"> • To the west of the site is a small area of rural residential lots. • Beyond these lots is the Garigal National Park.

Figure 8 – Location Plan



Source: Urbis

3. OUTLINE OF PROPOSED DEVELOPMENT

Elanora Country Club, the owners and operators of the site, seeks to develop a portion of the site for seniors housing (independent living units), complemented by the existing golf club facilities.

A Concept Plan prepared by CM+A is included at Appendix A and Figure 9 below, demonstrates the indicative built form of the proposed development. As shown, the seniors housing component will comprise the following elements:

- Maximum of 46 apartments in a 2 - 3 storey form.
- The proposed dwellings will provide a mix of apartment types, ranging from 150sqm to 180sqm.
- All independent living units will be built to fully comply with AS1425 Design for Access and Mobility and AS4299 Adaptable Housing.
- The number of bedrooms in each dwelling will be determined through detailed design in the DA process.
- Private parking will be provided for each apartment, with detailed design in the DA process.
- Associated landscaping of the surrounding grounds.
- A new access road along the eastern boundary of the site will connect to Illuka Avenue to provide secondary access in accordance with the recommendations from the Traffic Report (Appendix B).
- The concept will require vegetation removal to accommodate the housing in accordance with the Bushfire Assessment Report (Appendix C) and Ecologist Assessment Report (Appendix D).

Figure 9 – Seniors Housing Concept Plan



Source: CM+A

4. STRATEGIC PLANNING CONTEXT

4.1. STRATEGIC PLANS

A number of reports and strategies have been prepared that identify the demand for seniors housing within the northern beaches region. The NSW State Government and Warringah Council have prepared a number of strategic planning policy framework documents that address housing and social needs of the northern beaches community, including seniors housing. These needs are included in the following studies:

- A Plan for Growing Sydney (May 2014)
- Draft North District Plan (November 2016)
- SHOROC Spatial Analysis Report 2011
- Pittwater 2025 – Our Community Strategic Plan

The above studies and strategies are summarised below.

4.1.1. A Plan for Growing Sydney

A Plan for Growing Sydney, released in December 2014, is the NSW Government's plan for the future of the Sydney Metropolitan Area over the next 20 years. The Plan provides key directions and actions to guide Sydney's productivity, environmental management, and liveability – including the delivery of housing, employment, infrastructure and open space.

This Plan sets out actions that will deliver these goals for Sydney. Each goal has a number of priority areas (directions which provide a focus for the actions). The actions include:

- accelerating urban renewal across Sydney at train stations, providing homes closer to jobs;
- growing a more internationally competitive Sydney CBD;
- growing Greater Parramatta as Sydney's second CBD;
- transforming the productivity of Western Sydney through growth and investment;
- enhancing capacity at Sydney's Gateways – Port Botany, Sydney Airport and Badgerys Creek Airport;
- delivering the infrastructure that is needed;
- promoting Sydney's arts and culture, tourism and entertainment industries;
- protecting our natural environment; and
- managing long-term growth.

The Greater Sydney Commission is the dedicated new body with the responsibility to drive delivery of the Plan, and will be responsible for updating the Plan to align with the new District Plans. A Plan for Growing Sydney applies to the Sydney Metropolitan Area and focus' on providing more housing, with a greater choice of dwelling types in well-serviced locations. This will help meet changing household needs. The site is proximate to a 'Strategic Centre' of Dee Why, providing access to facilities and services.

Of relevance to the proposed development at Elanora Country Club is the following in the Plan:

- **Direction 2.3 – Improve housing choice to suit different needs and lifestyles.**

Housing choice is also increasingly about ‘universal housing’ that allows people to stay in their home as they age. Demographic projections of households provide the best indication of the total level of housing supply Sydney needs. These projections indicate an additional 664,000 new dwellings will be required in Sydney over the next 20 years (by 2031). The proposed provision will assist in contributing to this provision and increase of ILUs within the northern beaches.

- **Action 2.1.1 - Accelerate Housing Supply and Local Housing Choices**

Within Action 2.1.1 - Accelerate Housing Supply and Local Housing Choices, the policy states that the sub regional planning will drive the supply and choice of housing. The District Plans are anticipated in the first half of 2016 and will establish a framework to increase the supply of homes including those tailored to the needs of older people and people with a disability.

The policy also seeks to identify how the new metropolitan strategy can ensure an adequate supply of adaptable and accessible housing for older people. Individual developments should recognise and accommodate an aging population where practical to assist in meeting the demand for housing.

Further, the Seniors SEPP is the mechanism to facilitate the supply of seniors housing rather than specifically prescribing permissibility in the Warringah LEP 2011.

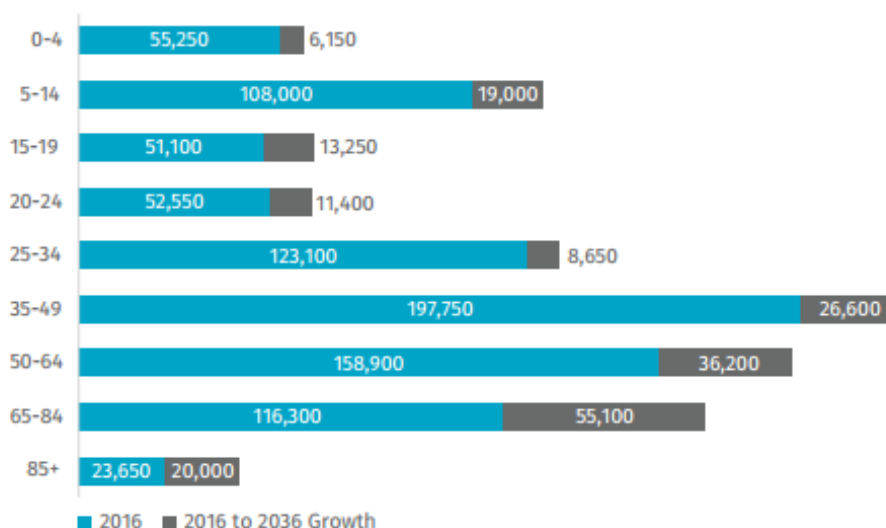
The proposed development on the subject site, for seniors housing, is aligned with the current approach of the NSW Government which identifies the need for additional housing that can be provided in existing urban areas, and ensures social inclusion to meet the needs of older people.

4.1.2. Draft North District Plan

The Northern Beaches Local Government Area (LGA) is located in North District of Greater Sydney, and the Draft North District Plan was prepared by the Greater Sydney Commission. The district will see a changing and increasing population over the next 20 years, with a significantly higher proportion of people over 65 and over 85.

Figure 10 – North District projected population growth by age group.

Figure 4-1: North District projected population growth by age group (2016 – 2036)



Source: Department of Planning & Environment, 2016 New South Wales State and Local Government Area Population and Household Projections and Implied Dwelling Requirements 2016 to 2036, NSW Government, Sydney

Source: North District Plan – Greater Sydney Commission

Relevant priorities raised in the Plan include:

- Improving housing choice, housing diversity and support planning for adaptable housing and aged care.
- Create opportunities for more recreation and community facilities.
- Foster cohesive communities in the North District.

The proposal will increase housing supply and choice the seniors of Northern beaches LGA. Also, it provides the opportunity for an active lifestyle for seniors within a small community.

4.1.3. SHOROC Spatial Analysis Report

This report was prepared to provide evidence-based analysis that was used as the basis to inform and support the 'Shaping Our Future' regional strategy adopted by Pittwater, Manly, Warringah and Mosman Councils.

This report found that the ageing population will be retiring hence demand will increase as they wish to stay in the region. This demand will increase the opportunities for the provision of Senior's Housing within the LGA. It notes that any options for meeting future growth through planning of the entire Council area will be addressed through various Council planning approaches, including through the Warringah Housing Strategy.

4.1.4. Pittwater 2025 – Our Community Strategic Plan

The Pittwater 2025 Community Strategic Plan (Local Plan) outlines the community's aspirations and desires to shape Pittwater's future. The Local Plan identifies strategic directions to ensure these aims can be met.

Council has adopted an overarching vision, underpinned by five key directions and twelve strategies to plan for the changing area until 2025. The Land Use & Development strategy promotes quality and diverse housing in harmony with Pittwater's landscape and lifestyle.

The strategy does not directly address seniors housing within its strategy, however it does acknowledge the requirement for balancing land uses and meeting the State Government's targets for local housing growth over the next 20 years.

5. STATUTORY FRAMEWORK

5.1. STATE ENVIRONMENTAL PLANNING POLICY (HOUSING SENIORS AND PEOPLE WITH A DISABILITY) 2004

State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004 (the Seniors SEPP) permits development on certain land for housing for seniors and people with disabilities. Clause 15 of the SEPP allows seniors housing to be carried out with consent on land zoned primarily for urban purposes.

The type of Seniors Housing proposed by the development is defined as self-contained dwellings, defined under the SEPP as:

self-contained dwelling is a dwelling or part of a building (other than a hostel), whether attached to another dwelling or not, housing seniors or people with a disability, where private facilities for significant cooking, sleeping and washing are included in the dwelling or part of the building, but where clothes washing facilities or other facilities for use in connection with the dwelling or part of the building may be provided on a shared basis.

Clause 23 of the Seniors SEPP includes special provisions for the development of seniors housing on land used for an existing registered club. This clause requires that the club use is distinctly separate from the senior's development, and that appropriate protocols are in place to manage misuse and abuse of gambling by senior's residents. As identified on the indicative concept plan, the seniors housing subject to the SCC application is separated from the Club. The detailed DAs to follow will be required to address detailed design matter and appropriate protocols to minimise harm associated with gambling.

Clause 24 requires that a site compatibility certificate (SCC) be obtained from the DPE for seniors housing on land that is used for the purposes of an existing registered club where the proposed development is not permissible under the relevant environmental planning instrument. As such, a SCC is required for the proposed development.

Clause 25(5)(b) lists criteria be addressed in an application for a SCC. These criteria are addressed, in respect to the proposed development, in Section 6 of this report.

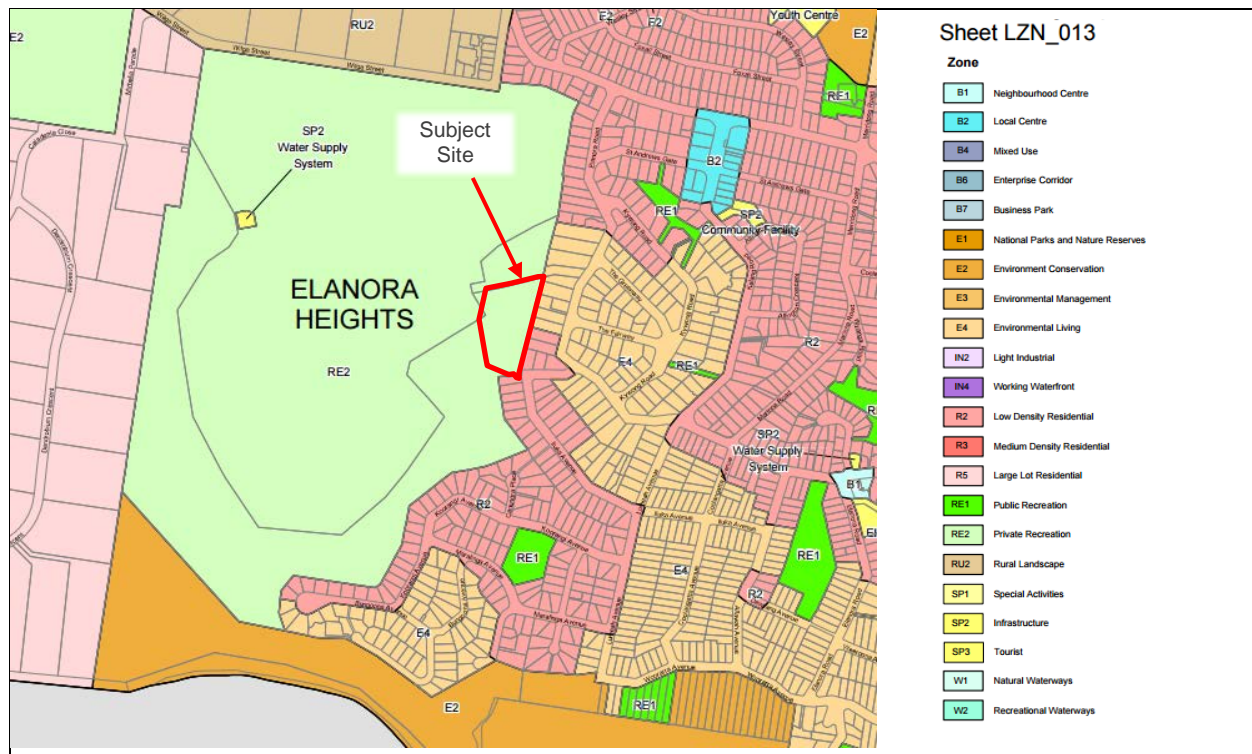
The contextual assessment and satisfaction of the various criteria under Clauses 24 and 25 of the Seniors SEPP within this SCC application provides the basis for a positive assessment of the proposed development that will be articulated in further detail in the relevant DA documentation required to be submitted to Northern Beaches Council following SCC approval.

5.2. PITTWATER LOCAL ENVIRONMENTAL PLAN 2011

5.2.1. Zoning

The site is located within the Northern Beaches LGA (Formerly within Pittwater Council). Therefore, the Pittwater Local Environmental Plan 2011 remains the current principle planning instrument applying to the site. The site is zoned RE2 Private Recreation and is adjacent to land zoned R2 Low Density Residential. Refer to the zoning map below.

Figure 11 – Pittwater LEP Land Zoning Map



The objectives of the RE2 Private Recreation zone are:

- To enable land to be used for private open space or recreational purposes.*
- To provide a range of recreational settings and activities and compatible land uses.*
- To protect and enhance the natural environment for recreational purposes.*
- To allow development of a scale and character that is appropriate to the nature of its recreational use and is integrated with the landform and landscape.*

The proposal is consistent with the RE2 Private Recreation zone objectives for the following reasons:

- The proposed seniors housing development has been specifically designed to complement the natural features of the site and is compatible with the surrounding residential and recreational uses and the prevailing character of the area.
- The proposed seniors housing is associated with the Elanora Country Club and will have access to the substantial supply of private open and recreational space as part of the Country Club Golf Course, tennis courts and bowling greens.
- The provision of significant gardens and the retention of certain trees on site will enhance and protect the natural environment on site.

5.2.2. Building Height

The maximum building height applicable to the subject site is 8.5m. Any future development application will address compliance with the applicable building height control.

6. SITE COMPATIBILITY CERTIFICATE

Clause 25(5)(b) of the Seniors SEPP contains the 'heads of consideration' to be addressed in a SCC application. These are listed below:

25 (5) The Director-General must not issue a site compatibility certificate unless the Director General:

(b) is of the opinion that the proposed development is compatible with the surrounding land uses having regard to (at least) the following criteria:

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.

The impact that the proposed development is likely to have on the uses that, in the opinion of the Director-General, are likely to be the future uses of that land.

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.

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,

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.

If the development may involve 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.

Each of these heads of consideration is addressed in turn below, in respect to the proposed development.

6.1. THE NATURAL ENVIRONMENT

6.1.1. Ecological

- The proposal comprises the establishment of seniors housing in the eastern portion of the site, currently containing native vegetation.
- An Ecological Constraints Assessment undertaken by Ecoplanning (Appendix D) identified the development will impact on existing native vegetation, categorised as 'partial' and 'full'.
- The partial impacts are specific to the APZ minimum setback Inner Protection Zone (IPZ). The full impacts are specific to the proposed building envelope, which includes the units and access roads.
- The assessment has identified three threatened species within the study area, being the Rosenberg's Goanna, Eastern Pygmy-possum and the Square-tailed Kite. No additional threatened species were identified during the assessment. However, it has been assessed there is a 'moderate' or 'high' likelihood of additional threatened species occurring in the area.
- No threatened flora was recorded in the subject site, however may occur in other sections of the study area.
- Based on the assessment, the proposal has the potential to impact on three threatened species under the *Threatened Species Conservation Act*.
- However, the assessment concludes that the proposed development is likely to be compatible with a seniors housing development and the impacts to the aforementioned species can be appropriately managed or mitigated. In order to manage or mitigate these impacts the Ecological Constraints Assessment recommends quantifying and assessing these impacts through the following potential pathways:
 - The preparation of a Species Impact Statement (SIS) to accompany a development Application.
 - Preparation of a Biobanking Statement

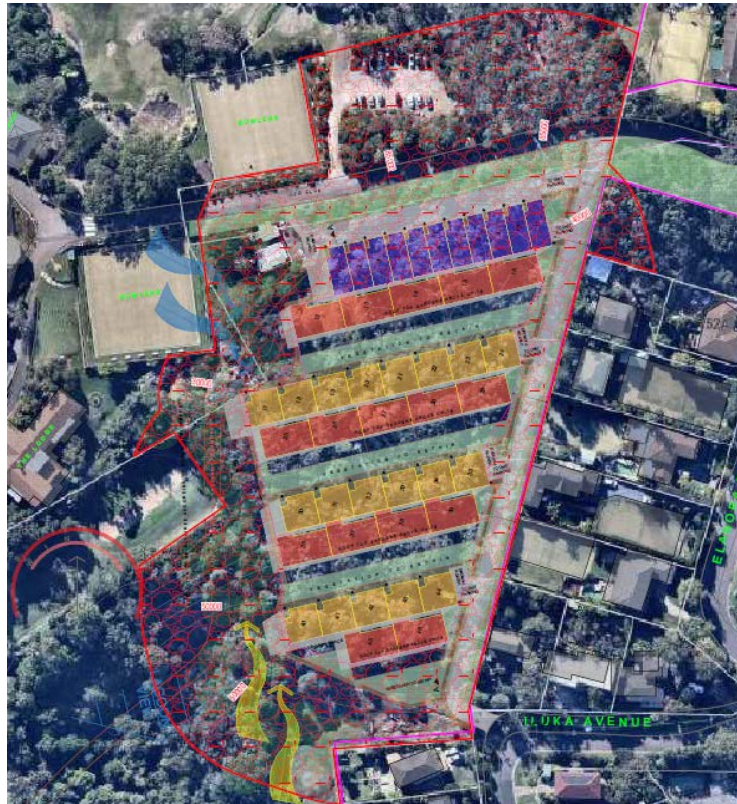
- These two options are outlined in Appendix D.

These assessment methods will be undertaken prior to lodgement of a DA to ensure that any potential impacts on the identified species are quantified and the appropriate mitigation and management measures are detailed as part of the application.

6.1.2. Bushfire

- A Bushfire Assessment undertaken by BCBHS has identified the site as being affected by possible bushfire impact as determined from the local Bushfire Prone Land Map as prepared by Council and the Rural Fire Service.
- The vegetation posing a hazard to the development site was found to be located to the north, northeast, south and west of the retained vegetation in Elanora Country Club grounds (overall site).
- The vegetation posing a hazard varies, ranging from scrub to trees 5 – 15 metres in height, as described in the bushfire assessment report.
- The slope and topography of the site was assessed to determine potential bushfire behaviour and the required Asset Protection Zones.
- The highest Bushfire Attack Level to the building footprints was determined to be 'BAL 12.5'. The future buildings will be required to comply with Section 3 and BAL 12.5 under Section 5 of AS3959 – 2009 and Appendix 3 under PBP 2006.
- Asset Protection Zones have been developed based on bushfire modelling achieving a radiant heat impact of no more than 10 kW/sqm at a building footprint. The required APZ's are listed in Section 7.05 of the Bushfire Assessment Report and the APZ Constraints mapping is shown in Figure 12 below.
- The nominated APZs around the proposed development site are proposed to be maintained in accordance with the requirements for an APZ (Inner Protection and Outer Protection Area) as described in the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'.

Figure 12 – Bushfire Prone Land Map



Source: BCBHS

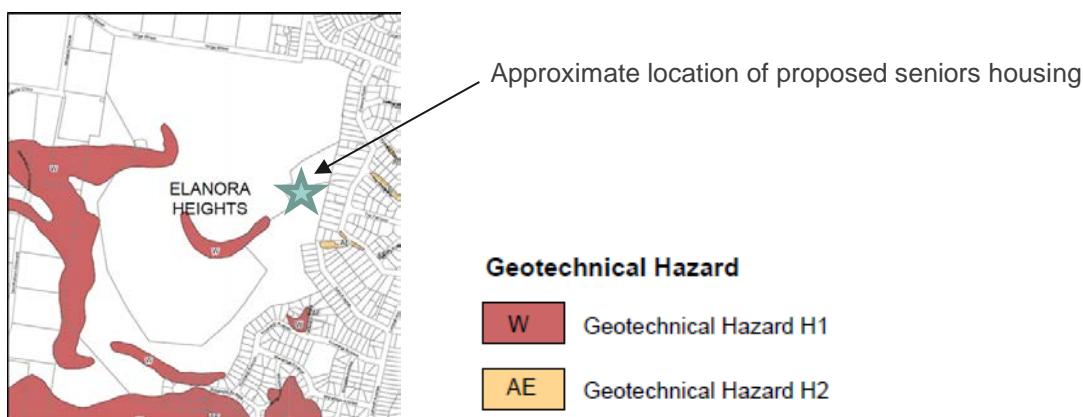
- BCBHS has made recommendations for the management of potential bushfire risk including firefighting water supply, adequate access and egress to the site, and the requirement for a fire trail along the western boundary of the development. These management measures will be incorporated into any future development application.
- In summary, BCBHS has identified at the strategic level the future seniors living development will not result in an unsatisfactory impact to surrounding existing development or fire services. The site also has the capacity to comply with the requirements of PBP 2006, and provide a satisfactory level of bushfire protection to the subject development.

6.1.3. Geotechnical Hazard

The Seniors SEPP specifically excludes land described in Schedule 1 (Environmentally sensitive land). The SEPP states that 'land' identified in another environmental planning instrument as a 'natural hazard' is considered environmentally sensitive.

Pittwater Local Environmental Plan 2014 identifies areas within the site as containing a 'geotechnical hazard'. Review of the Concept Plan indicates that portions of the site within the same lot as the proposed seniors housing are identified as a 'geotechnical hazard' as show in Figure 2.

Figure 13 - Extract of Pittwater Council Geotechnical Hazard Area H1 mapping



Legal advice has been obtained from Mills Oakley as to whether the partial affectation by this map will mean that the whole site is ineligible for development pursuant to the SEPP. In summary it finds that:

- The map is quite clear in identifying which land is affected by geotechnical hazard. It does not attempt to colour the whole of the site as red/ beige. As such, only those specific areas are 'described' by the map as being subject to a natural hazard.
- Given the specificity with which the map identifies those areas, it would be difficult to allege that the intention of the planning controls was to identify the whole site as being a hazard.
- There is a well-established body of case law which says that the use of the term "land" in planning instruments and the Environmental Planning and Assessment Act 1979 itself are concerned with the concept of land as a "topographical entity", not as "a bundle of rights". Accordingly, ownership is really irrelevant.

Accordingly, the Concept Plan shows that the proposed seniors housing avoids any development on those areas that are directly shown on the geotechnical map and this must be the case in order for the SEPP to apply. To avoid doubt, where possible this should also include areas for the purposes of drainage or footpaths or recreation or the like.

A Geotechnical Report (Appendix F) has been prepared by Douglas Partners to demonstrate that the site can be made suitable for seniors housing. The report provides a range of recommendations to manage any risk associated with the subsurface conditions of the site. The matters considered relevant to the development include:

- Confirmation the proposed development is outside of the Geotechnical Hazard Area H1 identified on the (former) Pittwater Council mapping.
- The involvement of excavation during construction will cause noise and vibration. However, the unit construction will be in excess of 20m from the nearest residential properties and therefore has a “rare” likelihood of adversely affecting the structures of the adjoining residences.
- The construction of the new access road may require excavation into bedrock to achieve acceptable grades. This excavation will be close to the adjoining residence and the report makes recommendations for excavation methods to reduce excavation induced vibration if required.
- Appropriate control measures and methodology for excavation on site, including excavation support, material disposal and batter slopes.
- Recommended design solutions for retaining structures and foundations.

6.1.4. Flooding

The SEPP also identifies ‘floodways’ or ‘high flooding hazard’ as environmentally sensitive land. Parts of the site are identified in the Pittwater Overland Flow Mapping and Flood Study - October 2013 as a major flood hazard and legal advice was sought from Mills Oakley as to whether this excluded the land from the SEPP. The advice is provided in full in Appendix B and in summary concludes that while Pittwater Council have previously taken a different view, legal precedence has found that the designation must be within the LEP itself in order to exclude the operation of the SEPP.

Notwithstanding, specialist advice on flooding and stormwater management has been prepared by TTW as shown in Appendix E. The advice includes:

- Identification of existing stormwater management services within the site, including various discharge points and infrastructure to convey water.
- Catchment analysis to understand what catchments affect the areas where development is proposed. A rational method analysis was undertaken for the 100-year flow for the predevelopment and post development scenarios across the catchments affecting the area of works.
- Confirmation the site is not flood affected and no additional flood studies will be required.
- Recommendations for pits, pipes, swales and onsite detention to control additional stormwater flows.

6.2. EXISTING AND APPROVED USES

- The surrounding locality reflects the zoning under the Pittwater LEP 2014, and is characterised by low density residential uses to the east and rural residential uses to the north and west as shown below in Figure 8.
- The proposed seniors housing is compatible with the character of the area and at the interface with the low density residential area to the east.
- The site is primarily used for private recreation purposes, which are of a nature that adverse environmental impacts (noise and odour) are unlikely to occur.
- There are no known relevant approvals within the immediate vicinity of the site that would be compromised by the proposed development.

Figure 14 – Surrounding Land Use Characteristics



Source: Six Maps

6.3. IMPACT ON THE LIKELY FUTURE USE OF THE LAND

6.3.1. A Plan for Growing Sydney

- A Plan for Growing Sydney does not identify any specific uses on the subject site or the land immediately surrounding.
- The proposal is consistent with the goal of the plan to increase housing choice and allows the local aging population who choose to downsize their homes to remain within the Blacktown area (see Direction 2.3).

6.3.2. Draft North District Plan

- The Draft North District Plan does not identify any specific uses on the subject site or the land immediately surrounding.
- The proposal is consistent with the priority to accelerate housing supply, choice and the provision of adaptable housing for ageing in place. The provision of 30 self-contained dwellings will improve the housing choice and diversity for seniors in the Pittwater area, whilst the quality, facilities and amenity of the proposed Seniors Housing Village will afford future residents with an excellence place to live.

6.3.3. Pittwater Local Environmental Plan 2014

- A range of suitable land uses are permissible within the RE2 Private Recreation zone.
- The proposal does not alter the primary use of the site, being a Golf Course and other outdoor recreation uses associated with the Country Club.
- A significant proportion of the vegetation on site will be retained across the site will protect the natural environment on site.
- It is considered that the proposed use of the site for seniors housing will have minimal significant impacts on the future use of the site or of surrounding sites.

6.3.4. Continued use as a club site

The Elanora Country Club has a long-standing history in the local area, occupying the subject site since 1928. The Club has two significant buildings, being 'The Lodge' and 'The Pavilion'. The Lodge comprises 8 double and twin rooms available to members of the Country Club, for weekend stays. The Pavillion provides dining to its members in a small restaurant.

The club is committed to continuing to provide recreational facilities to its members and the wider community through the provision of the golf course, bowling greens, tennis courts and food offering.

The diversification of uses (including the provision of seniors housing) on the site strengthens the ongoing future of the Country Club, and provides the opportunity for future residents to form a close community within the club.

The proposed seniors housing component of the development, and the distinctly separate function of both the club use and the seniors housing will not result in any significant impact on the future use of the site for registered club and community uses.

6.4. THE AVAILABILITY OF SERVICES AND INFRASTRUCTURE (PARTICULARLY RETAIL, MEDICAL, COMMUNITY AND TRANSPORT)

6.4.1. Public and Private Transport

The SEPP establishes a number of access requirements which must be met by seniors housing development. Specifically, the SEPP requires that residents of the proposed development must have access to:

- Shops, bank service providers and other retail and commercial services that residents may reasonably require, and
- Community services and recreation facilities, and
- The practice of a general medical practitioner.

In order to comply with this requirement, these facilities must be located within 400m from the site accessible by a suitable access pathway with specific gradient requirements.

The nearest facilities to the site are located at a distance in excess of 400m from the site. However, the SEPP states that for sites within the Sydney Statistical Division the access requirements can be satisfied if there is a public transport service available to the residents which:

- Is located within 400m from the development and accessible by a suitable access pathway, and
- Will take residents to a place located within 400m from the facilities and services, and
- Is available at least once to and from the development between 8am and 12pm per day and between 12pm and 6pm each day from Monday to Friday (both days inclusive),
- The gradient along the pathway from the site to the public transport services (and from the public transport services to the facilities and services) comply.

A desktop review indicates that current public transport services in the area do not meet this requirement. A bus service capable of carrying at least 10 passengers and which meets these requirements will therefore be required as part of the proposed development. The details and management for the ongoing operation of a bus service for the site will be included in any future DA lodged with Council.

As shown in Figure 14, Elanora Heights Village is located approximately 700m from the site. The main street for the village centre is Kalang Road which contains a variety of retail, medical and recreation amenities.

6.4.2. Retail, Food and Groceries

- There are no shopping centres, supermarkets or significant retail facilities located within 400m of the site. There is however a bakery, IGA supermarket, newsagents, cafes and hairdressers located in Elanora Heights Village.
- Any future DA will set out the details of a bus service to be available to residents proving transport between the site and proximate services and amenities.
- The Warriewood Square is located 3.5 km to the east.
- The Westfield Warringah Mall is located approximately 8km to the south.

6.4.3. Banks and Post Offices

- There are no banks or post offices located within a 400m radius of the subject site.
- The nearest Post Office is located in the Elanora Heights Village, approximately 700m from the site.
- Any future DA will set out the details of a bus service to be available to residents proving transport between the site and proximate services and amenities.
- A bank service provider means 'any bank, credit union or building society or any post office that provides banking service'. The post office provides some financial services which are considered to satisfy this requirement.

6.4.4. Libraries

- There are no libraries located within a 400 metre radius of the subject site.
- Mona Vale Memorial Library is located within the Northern Beaches Council building, near the intersection of Barranjoey Road and Pittwater Road, Mona Vale.
- In addition to book lending services, the library provides CDs, DVDs and magazines. It also provides a home library service for people who are homebound.

6.4.5. Community Centres and Senior Citizens Clubs

- There is a range of social clubs in the area providing entertainment, classes and courses.
- The Elanora Heights Community Centre is located within 800m of the site, on Kalang Road. The centre is suitable for functions, classes, meetings and small exhibitions.

6.4.6. Medical Practitioners and Hospitals

- There are no medical practitioners or hospitals within 400m of the site.
- The nearest pharmacy and Medical Centre are located in the nearby Elanora Heights Village.
- Any future DA will set out the details of a bus service to be available to residents proving transport between the site and proximate services and amenities.

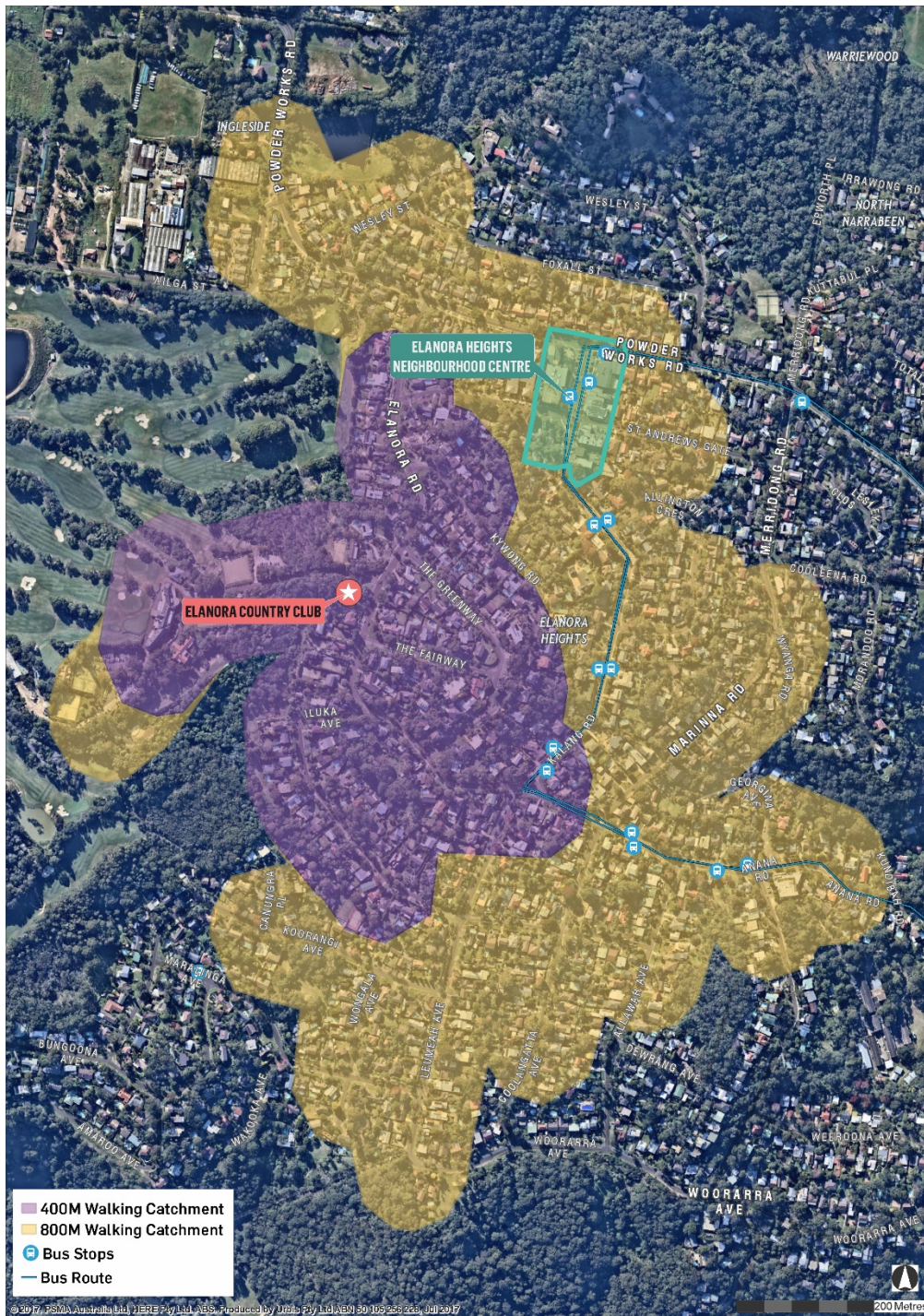
6.4.7. Parks and Recreational Facilities

- There are numerous parks and reserves located within 2km of the subject site.
- There is no public local open space within 400m walking distance from the subject site. However, the site itself will be located near existing high quality, outdoor recreation facilities offered as part of the Country Club and available to the future seniors housing residents. As such, the provision of open space in proximity to the site is considered adequate.

6.4.8. Essential Services

An Essential Services Report (Appendix F) has been prepared to demonstrate access to water, sewer, gas and electricity.

Figure 15 – Walkability Map



Source: Urbis

6.5. IMPACT ON THE PROVISION OF LAND FOR OPEN SPACE OR SPECIAL USES

The site is not zoned for public open space or special uses, however is zoned RE2 Private Recreation.

The proposed redevelopment of the club site will retain the private recreation capability by the retention of the club house, golf course, bowling greens and tennis courts. Additional landscaping and improvement in the existing landscaping will occur around the boundary of the site, and improving the presentation of the overall site.

6.6. IMPACT OF BULK, SCALE, BUILT FORM AND CHARACTER

The following photo shows the existing built form to the east of the site:

Figure 16 – Adjoining Dwelling to the east

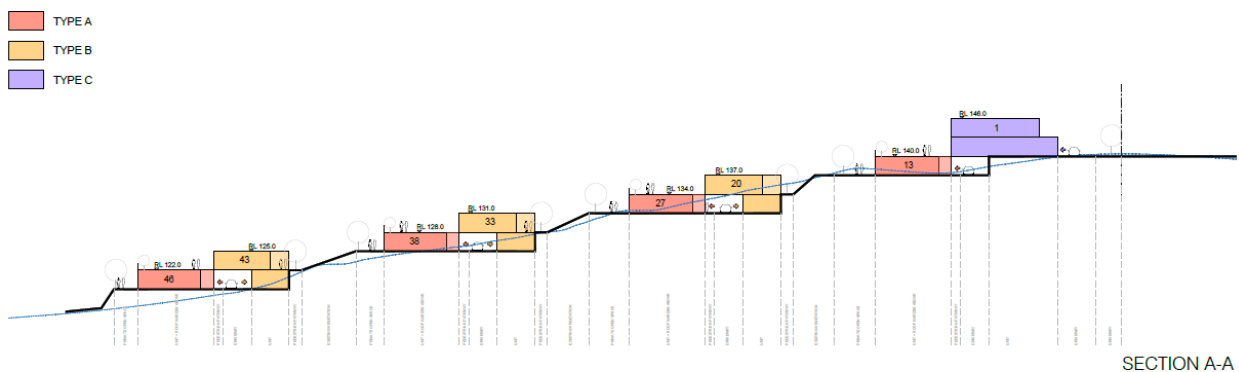


Source: CM+A

The proposed development scheme is appropriate in the surrounding context as:

- The proposed development site has sensitively considered the surrounding context of bushland, and the adjoining existing dwellings.
- The character of the adjoining residential dwellings is predominantly single and double storey detached dwellings.
- The proposed built form on the site (maximum of two storeys) will be consistent with the low density character of the surrounding area.
- The Section in Figure 16 demonstrates the terraced design of the dwellings respond to the topography of the site and minimises the bulk and scale.

Figure 17 – Section Plan



Source: CM+A

- The proposed built form of the seniors housing is of a low scale, and will ensure that the amenity of the adjacent occupiers is well respected. The development is orientated in a manner that will not cause a loss of views and allows adequate privacy between these buildings and adjoining existing buildings.
- The proposed accessway facilitates in creating a buffer between the proposed seniors housing and the existing dwellings to the east, to ensure adequate separation between these buildings and existing dwellings, minimising impacts on privacy and noise.
- The proposal will not result in any significant loss of solar access to nearby properties as the site adjoins open space to the north, south and west.

6.7. ACCESS AND TRAFFIC

- A traffic impact statement has been prepared by TTPP to assess the existing road network capacity, requirements for parking demand and adequate access for future residents.
- It is noted that the existing driveway off Elanora Road will continue to serve as the Club's main vehicle access.
- The proposed secondary driveway linking the existing driveway to Iluka Avenue is not expected to result in adverse traffic impact on the surrounding road network. The design of the new driveway will be detailed further as part of the DA process.
- The assessment identifies that the proposed development will satisfactorily comply with the minimum car parking requirements of the Seniors SEPP.
- On this basis, the proposal can be adequately serviced by vehicle traffic, provides sufficient car parking on site and will not generate adverse impacts on the surrounding road network. A Traffic Impact Statement that provides further development detail will be provided with any DA lodged.

6.8. CLEARING OF VEGETATION

- The Ecological Constraints Assessment (Appendix D) undertaken by EcoPlanning identifies the area for proposed development consists of land mapped as Coastal Sandstone Gully Forest and Coastal Sandstone Heath Mallee, with a small area of regenerating shrubs and woodland.
- The two native vegetation communities identified in the subject site are not listed as a TEC under the EPBC or TSC Acts.

7. CONCLUSION

The proposal has been assessed against the required criteria as stipulated in Clause 25(5) of the SEPP (Housing for Seniors and People with a Disability) 2004 within this report. It has been demonstrated, as summarised below, that the site is appropriate for the form of development proposed.

- Initial site investigations have shown that any natural hazards or land constraints affecting the site (such as flooding, geotechnical and ecological) can be appropriately managed and the site is suitable for the proposed seniors housing.
- The club is committed to continuing to provide recreational facilities to its members and the wider community through the provision of the golf course, bowling greens, tennis courts and food offering.
- The diversification of uses (including the provision of seniors housing) on the site strengthens the ongoing future of the Country Club, and provides the opportunity for future residents to form a close community within the club.
- The development of the site to include the proposed seniors housing component will not have any adverse impacts on the current or likely future uses of the site and surrounding areas.
- Due to the location of the site, there are limited services available within 400m of the site. However, any future DA will set out the details of a bus service to be available to residents providing transport between the site and proximate services and amenities.
- The proposal will have no adverse impact on the provision of land for open space adjoining the site and will retain the public recreation land through the retention of the golf course, bowling green and other associated uses.
- The proposed built form is appropriate in the context of surrounding residential and recreational development, which comprises two storey residential dwellings to the east, and open space, fairways and vegetated areas to the north, south and west.
- No significant vegetation will be affected by the proposal, and the development will still retain landscaping associated with the golf course.

This report has demonstrated that the proposal to develop the eastern section of the Elanora Country Club site to include seniors housing, meets the relevant 'heads of consideration' under clause 25 of the Seniors SEPP. It is therefore considered that the Minister's consent can be granted to the issue of a Site Compatibility Certificate allowing a DA to be lodged with Council for a seniors housing development.

DISCLAIMER

This report is dated August 2017 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Pty Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Elanora Country Club (**Instructing Party**) for the purpose of Site Compatibility Certificate (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A ARCHITECTURAL PLANS

APPENDIX B TRAFFIC REPORT

APPENDIX C BUSHFIRE ASSESSMENT REPORT

APPENDIX D

ECOLOGIST ASSESSMENT REPORT

APPENDIX E CIVIL REPORT

APPENDIX F

GEOTECHNICAL REPORT

APPENDIX G SERVICES REPORT



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