




Site Compatibility Certificate Application Report

Willoughby Legion Ex-Services Club
26 Crabbes Avenue, Willoughby

Submitted to Department of Planning and Environment
On Behalf of Hyecorp Property Group

Report Revision History

Revision	Date Issued	Prepared by	Reviewed by	Verified by
01 Draft	20/12/17	Michael Watson <i>Senior Project Planner</i>	Susan E Francis <i>Executive Director</i>	 Susan E Francis <i>Executive Director</i>
02 Draft	21/12/17	Michael Watson <i>Senior Project Planner</i>	Susan E Francis <i>Executive Director</i>	
03 Final	22/01/18	Michael Watson <i>Senior Project Planner</i>	Susan E Francis <i>Executive Director</i>	

This document is preliminary unless approved by a Director of City Plan Strategy & Development

CERTIFICATION

This report has been authorised by City Plan Strategy & Development, with input from a number of other expert consultants, on behalf of Hyecorp Property Group. The accuracy of the information contained herein is to the best of our knowledge not false or misleading. The comments have been based upon information and facts that were correct at the time of writing this report.

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Appendix	Document	Prepared by
1.	Design Package	GMU Urban Design and Architecture
2.	Survey	CMS Surveyors Pty Ltd
3.	Heritage Impact Statement	NBRS and Partners
4.	Traffic Statement	Colston Budd Rogers and Kafes
5.	Pre-Consultation Report	Urban Concepts
6.	Local Centre Studies	Architectus on behalf of Willoughby City Council

1. Executive Summary

This report has been prepared for Hyecorp Property Group by City Plan Strategy and Development Pty Ltd ("CPSD") to accompany an Application for a Site Compatibility Certificate ("SCC").

The Club Willoughby site is used for the purposes of a registered club and is located at **No. 26 Crabbes Avenue, Willoughby** ("the site").

The application is to enable the development of approximately 99-125 self-contained dwellings and approximately 36-72 bed residential aged care facility under *State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004* on the site, and to establish the maximum height and Floor Space ratio (FSR) for such a development to provide certainty to the community. The proposed seniors housing forms part of the re-development of the site, which aims to enhance the Club's facilities and widen the services it provides to the local community. Details of the proposed development are provided at **Section 2.2** of this report.

Three (3) meetings have been held with Council to discuss the SCC and concept proposal, and Council were generally supportive of the proposal, subject to the inclusion of a public park to be situated on the site. Community consultation has also been undertaken as part of the master planning of the site. The design of the proposed concept plan has been adapted to respond to the comments made by both Council and the community.

This report provides the information required to be submitted with the Application Form for the SCC and should be read in conjunction with the accompanying urban design package prepared by GMU Urban Design (**Appendix 1**).

The report demonstrates the merit in the Department issuing a SCC for the proposal.

2. Development Proposal Information (C1)

2.1 Context

2.1.1 The site

The subject site is located in the suburb of Willoughby approximately 1.5km east of the Central Business District (CBD) of Chatswood near the corner of Crabbes Avenue and Penshurst Street. The street address is **No. 26 Crabbes Avenue, Willoughby**.



Figure 1: Location of the site in the broader context (Source: Google Maps)

The proposed seniors development will be located on the majority of the broader Willoughby Club site. The legal property description comprises fifteen (15) allotments as follows:

- Lots 4 to 11 Section C DP6291;
- Lot B DP364487;
- Lots A and B DP 438684;
- Lot 1 DP950651; and
- Lots 1 and 2 DP950652;

The area of the site is approximately 1.38 hectares (ha) (i.e. 13,788m²), is irregular in shape, and has frontage to both Penshurst Street and Crabbes Avenue. Refer to **Figure 2** for further detail.



Figure 2: Aerial view of the site (site outlined in red) (Source: SIX Maps)

The majority of the site is currently zoned RE2 Private Recreation under *Willoughby Local Environmental Plan 2012* (WLEP 2012), as shown in **Figure 3**. A minor portion of the site towards the south-western boundary and the north-eastern boundary is zoned R2 Low Density Residential. The development control table for the RE2 zoning is provided in **Table 1**.

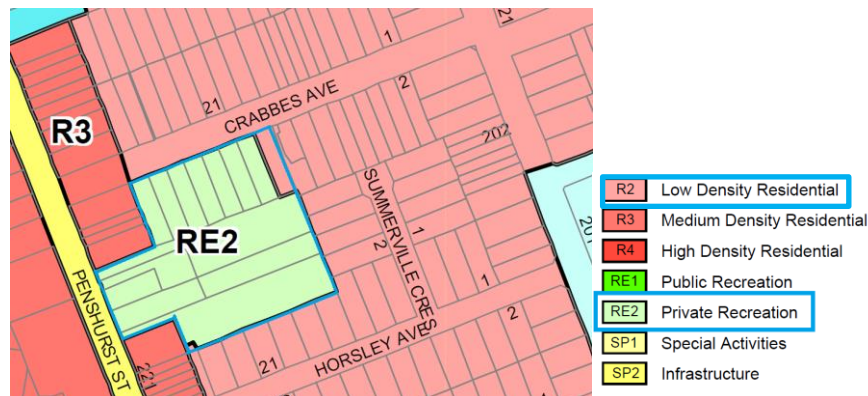


Figure 3: Current land use zoning of the site, outlined in blue (Source: WLEP Zoning Map)

Table 1: Zone RE2 Private Recreation development control table (WLEP 2013)

1. Objectives of zone	<ul style="list-style-type: none"> 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 minimise the potential for adverse effects from new development on the amenity of the locality.
2. Permitted without consent	Nil
3. Permitted with consent	Centre-based child care facilities; Community facilities; Environmental facilities; Environmental protection works; Kiosks; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Registered clubs; Respite day care centres; Roads

2.1.2 Existing improvements

The Willoughby Club site currently contains an existing operating registered club building, car par, sporting greens, a War Memorial, and other ancillary structures. The site has been used as a club since 1955. Vehicular access to the site is obtained from Crabbes Avenue, and a secondary pedestrian access is located off Penshurst Street. The Club building is two (2) storeys in height and is located centrally on the site. There is a secondary one (1) storey building located in the south-western corner of the site.

The following series of photographs of the site illustrates existing improvements on the site. For more details, see **Section 2.1** of the accompanying Design Package (**Appendix 1**). Refer to **Figures 4 to 7** which demonstrates the existing site.



Figure 4: View of the site looking east from Penshurst Road (Source: Google Maps)



Figure 5: View of the existing car park and two (2) storey Club as viewed from Crabbes Avenue (Source: Google Maps)



Figure 6: View of the building and greens fronting Penshurst St (left) and view of existing building from the car park (right) (Source: Hyecorp)



Figure 7: Single storey bowling club (left) and view towards the southern boundary (right) (Source: NBRS Partners)

2.1.3 Context and land uses

The site is located in a well-established urban area, in close proximity to the local district of Willoughby North. The surrounding area principally comprises detached residential housing, with higher density retail and residential building fronting Penshurst Street. A summary of the surrounding context is outlined as follows:

- Land adjoining the site to the east and south predominantly consists of single storey detached dwellings with pitched roofs. Multi-dwelling development is present in Crabbes Avenue. The zoning of the land is R2 low density residential.
- Residential development fronting Penshurst Street ranges up to four (4) storeys in height. Specifically, there are various four storeys RFBs on the western side of Penshurst Street opposite the site. The zoning of the land is R3 Medium Density Residential.
- Adjoining the site to the north west consists of two (2) storey commercial premises built boundary to boundary.
- Approximately 450m to the north west is a local shopping district (East Village Centre) which has an array of retail, commercial and community uses. Some uses include, but not limited to, pharmacy, cafes, restaurants, newsagency, post office, petrol station, supermarket, dentist, hairdressers, pub, and a bank. Development ranges between two and four storeys in height within the local centre.
- Approximately 250m to the south east is a further shopping district (High Street Centre) which have an array of services and facilities. This includes cafes, restaurant, liquor store, doctors surgery, newsagency, bakery, chemist, church, school, veterinary hospital, supermarket, real estate agency, and banking facilities.
- Approximately 550m to the south of the site is the Penshurst Street Centre, which has an array of services and facilities. This includes shops, cafes/restaurants, gymnasium, post office, liquor store, school, pharmacy, and medical practitioners.
- A Public Park (Bales Park) is situated approximately 400m walking distance from the site to the west.
- There are two bus stops that are situated immediately adjacent to the site on Penshurst Street. These bus stops have multiple buses that provide services to the surrounding area and beyond, including the Sydney City CBD, Chatswood, and Bondi Junction.
- There are two churches in close proximity (within 400m) of the site, located on Horsley Avenue (St Thomas Catholic Church) and Clanwilliam Street (Uniting Church of Australia).
- Penshurst Street is a busy road carrying heavy traffic throughout the day.

Refer to **Figures 8 and 13** which gives an understanding of the surrounding area:



Figure 8: Four (4) storey residential buildings adjacent the site on the western side of Penshurst Street (Source: Google maps)



Figure 9: Development fronting Penshurst Street (Source: Google Maps)



Figure 10: Development fronting Crabbes Avenue to the east of the site (Source: Google Maps)



Figure 11: Existing dwellings located within Horsley Avenue (Source: Google Maps)



Figure 12: Development along Penshurst Street in the local centre to the north of the site (Source: Google Maps)



Figure 13: Services and Facilities located at the High Street Shops (Source: Google Maps)

2.1.4 Access to services and facilities

The site is well located for access to a wide range of services and facilities. The site itself contains outdoor recreation area with existing (unused) bowling greens. It is anticipated that these bowling greens, which are currently unused, will be removed, and replaced with a public park that will have frontage to Crabbes Avenue. The park will be available to both members of the public, as well as the residents and visitors to the site.

Bus stops are located along Penshurst Road adjoining the site and on the northern side of the road . These stops are currently serviced by the following buses:

- Route M40: between Chatswood, Willoughby, Naremburn, City, Darlinghurst, Paddington, Woollahra and Bondi Junction. Services operate every 10 to 20 minutes in each direction, seven days per week;
- Route 257: between Chatswood, North Willoughby, Willoughby, Naremburn, Crows Nest, Neutral Bay and Cremorne. Services are at least every 30 minutes in each direction, seven days per week;
- Route 272: weekday peak hour service between North Willoughby, Willoughby, Naremburn and Wynyard; and
- Route 343: between Chatswood, North Willoughby, Willoughby, Naremburn, Crows Nest, North Sydney, City, Redfern, Waterloo, Zetland, Rosebery, Eastlakes, Kingsford, 7 days a week.

As demonstrated above, these bus services provide access to a wide variety of destinations that contain the necessary services and facilities reasonably anticipated for seniors. The bus stops are located within walking distance from the site, and are accessible by a footpath that is level and is anticipated to be a 'suitable pathway'.

The site is also located approximately 250m-350m from the High Street Centre which provide a range of services and facilities that would reasonably cater for the needs of the future residents of the seniors development. Also located approximately 400m from the site is the Chatswood East Shops that contains a variety of services and facilities located along

Penshurst Street (i.e. East Village Centre). A public park (Bales park) is approximately 400m to the west of the site.

The range of services and facilities currently accessible to the seniors housing precinct satisfy the accessibility criteria specified in Clause 26 of the Seniors Housing SEPP. The proposed development is expected to further improve this situation for future residents, as discussed in **Section 3.2** of this report.

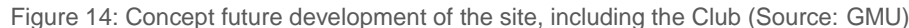
2.1.5 Open space provisions

The site subject to the SCC is zoned RE2 Private Recreation under WLEP 2012. **Section 3.4** of this report considers the implications for continuing open space provision and use on the site.

100%

- Approximately 99-125 self-contained dwellings;
- Approximately 36-72 RACF beds and associated facilities;
- Approximately 378-406 car parking spaces;
- Building heights of the building envelopes between two (2) storeys and five (5) storeys (i.e. 8.5m to 20.5m);
- Density of the future seniors development on the site to have a maximum FSR of 1.35:1; and
- Associated community spaces and facilities.

The indicative scheme that has been prepared for the site is outlined below in **Figure 14**:



The height associated with each of the indicative buildings are outlined below:

Building	Height in Storeys	Height in Metres (m)
A	3	15.7m
B	5	20.5m
C	Part 2 and part 3	8.5m-11.5m
D	Part 2 and part 3	8.5m-11.5m
E	Part 2 and part 5	14.5m-17.5m

The height and FSR that is sought under the SCC is considered compatible for the land, having consideration of the surrounding development, and for the future development of the land as anticipated under the current and future planning controls. It is noted that the WLEP does not nominate an FSR or height limit for the site. However, it does identify height and FSR controls for adjacent sites. The Seniors SEPP does not identify a maximum FSR standard, but identifies a non-refuse standard of 0.5:1 for ILUs and a non-refuse standard of 1:1 for RACFs. The Seniors SEPP does identify a maximum height standard of 8m for all seniors development under the SEPP. The height and FSR controls under the Seniors SEPP are considered to be in-compatible across the entire site at this location for re-development. The proposed height (between 8.5mm and 20.5m) and FSR (1.1:1) is more appropriate with regard to the surrounding context, where taller and denser buildings are evident, whilst maintaining the lower scale character to the north, east and south.

The overall indicative concept has carefully positioned the buildings around the site, with regard given to the adjacent properties and heritage conservation zone. Lower scale buildings are to be located along the boundaries of the site that adjoin residential properties as well as to Crabbes Avenue. Greater height has been situated along Penshurst Road, where the Club will be re-located so that it has more presence and is more accessible from Penshurst Road. The development transitions up in height towards the centre of the site, where it is less visible to/from the surrounding area. A new park will be accessible from Crabbes Avenue, and will be available to the public, residents of the seniors development, and the Club (including Memorial Services).

Careful consideration has been given to isolating and separating the seniors housing from the new club and associated activities (consistent with Clause 23(1)(a) of the Seniors Housing SEPP). However, the proposed seniors housing is proximate enough for residents to enjoy the facilities provided by the registered club and the associated social and recreational facilities if they wish. This also includes the careful integration of the public park on Crabbes Avenue. The park is to be used and enjoyed by members of the public, residents of the seniors housing, and customers/members of the registered. Important to the design philosophy was the direct connection of the park from the club, so that the site can continue to be used for war memorial services (such as Anzac Day services).

Indicative shadow diagrams have also been prepared for the concept plan for the site. The shadow diagrams demonstrate that the site is likely to receive satisfactory solar access to private/communal open spaces and the park. GMU also anticipate that the future development is capable of satisfying the minimum requirements of SEPP 65 and the Apartment Design Guide (ADG) for both solar access and cross ventilation.

More details of the concept are contained in the accompanying Design Package prepared by GMU (**Appendix 1**).

2.3 Strategic justification

A Plan for Growing Sydney

The NSW Government released A Plan for Growing Sydney in 2014, which is the regional strategy applying to the site.

A Plan for Growing Sydney does not provide any specific directions for the site, but does provide a context for the growth and change expected to occur nearby. The site is situated close to Chatswood, which is located in the Global Economic Corridor and is a Strategic Centre. Chatswood is expected to benefit from public and private investments to support the growth of additional mixed use developments, including offices, retail services and housing.

The proposed development is not inconsistent with any of the directions set out in A Plan for Growing Sydney.

Draft North District Plan

The Greater Sydney Commission released a draft South West District Plan for public exhibition in November 2016 ("draft District Plan"), and a revised Plan was recently came off exhibition in December 2017. Once finalised, this will be the District Plan applying to the site.

As relevant to this proposal, the draft District Plan sets a five-year target for the Willoughby Local Government Area ("LGA") of 1,250. It also sets out a range of planning considerations for creating healthier and more liveable communities.

The proposed development is not inconsistent with any of the directions set out in the draft District Plan.

Willoughby City Council Draft Centres and Housing Study

Since February 2017, Willoughby City Council is in the process of preparing a Draft Housing Strategy and Local Centres Strategy. A 'Position Statement' was prepared in relation to the housing demands in the LGA, which, amongst other things identified that the Willoughby LGA will need to accommodate 13,200 persons and 6,450 dwellings by 2036. The Position Statement outlined various areas within the LGA that should be identified for further investigation to accommodate the increasing population and demand for housing. Of relevance to this SCC, the following local centres were identified for investigation:

- East Village Centre. This is situated approximately 450m from the site.
- High Street Centre. This is situated approximately 250m from the site; and
- Penshurst Street Centre This is located 550m from the site.

Council have undertaken preliminary investigations to the areas identified in the Housing Position Statement. The preliminary studies are currently on exhibition on Council's website. These studies identify three different scenarios for the future re-development of these areas. Of importance, is that the study indicates that these centres need to accommodate an uplift to the current planning controls to facilitate/encourage re-development of these areas.

A copy of these local centre studies have been attached at **Appendix 6**.

2.4 Pre-lodgement consultation

Council

A preliminary meeting was held with Council on 19 January 2017 to discuss the potential re-development of the site for a seniors housing and a registered club.

A second meeting was held with Willoughby Council Senior Staff on 16 October 2017 to discuss the master planning of the site, inclusive of the Seniors' Housing proposal. Council did not raise any concerns specific to the senior housing proposal, but required consideration to be given to providing and enhancing recreational opportunities on the site. Council indicated that they preferred an accessible open space from Crabbes Avenue that could be used by both residents/members of the development, as well as the general public.

A third meeting was held with Council on 14 December 2017 to discuss a revised Concept Plan for the site. Council were supportive of the increased and re-located public park. Council also commended the applicant on the scale of the concept plan that is proposed to the adjoining lower density residential properties of two (2) to three (3) storeys.

Public Consultation

The following pre-lodgement consultation has been undertaken to date:

- Stakeholder Round Table Breakfast held on 18 October 2017;
- Community Meet and Greet Briefing Session held on 18 October 2017;
- Club Member briefing 20 September 2017;
- Club Member Survey; and
- Stakeholder and resident survey.

The above consultation was undertaken and managed by Urban Concepts, who specialise in community engagement. Full details of the consultation and feedback from those who participated is included at **Appendix 5**.

3. Site compatibility criteria statement (C2)

This section provides information demonstrating that the site is suitable for more intensive development and the proposed seniors housing is compatible with the surrounding environment, having regard to the matters for consideration outlined under clause 25(5)(b) of the Seniors Housing SEPP. It should be read in conjunction with the accompanying Design Package (**Appendix 1**).

3.1 Natural environment and existing uses of land

The surrounding area is a well-established urban area, that comprises both residential development and commercial properties. The topography generally falls gently in a southerly direction along Penshurst Street, with remanent vegetation limited along the streets as well as the rear yards of individual properties. The existing site is already developed and contains little undisturbed natural environment. In this respect, there are two buildings located on the site, with the remaining majority of the site comprising a hard stand car park and three bowling greens. There are various trees located in the car parking area that provide shade for vehicles. Due to the site sloping away from Penshurst Road, the bowling greens along the southern elevation are elevated above the ground level of the adjoining properties by up to 1.5m. The bowling greens are no longer used due to the upkeep costs, which require extensive watering and maintenance.

The future uses of the indicative proposal suggest various built forms on the site, that are surrounded by landscaped areas with soft plantings on the side boundaries. Various trees will be required to be removed from the site, however, a public park is indicated on the concept proposal which is to include a variety of plantings and landscaping elements to supplement the removed vegetation, and enhance the amenity of the site to encourage members of the public to use this space. Deep soil will be maximised to minimise overland flow from the site. More details of water management, in terms of quantity and quality would accompany any future DA for the proposal. This will include mitigation measures during demolition, construction, and ongoing use of the site.

To our knowledge, the site has not been used for any purpose that would result in contamination of the land. It is likely that the site is either already suitable in its current form or readily able to be remediated to a standard that makes it suitable for the proposed use, without impacting on surrounding land use. A contamination assessment will accompany any future DA for the proposal that addressed the requirements under SEPP 55.

As indicated above, the site is surrounded by detached residential housing on the north, east, and south boundaries. The existing development fronting Penshurst Street ranges in height, up to four storeys immediately opposite the site, and include both residential development (residential flat buildings (RFBs) and commercial properties. The area is in a state of transition, with recent buildings being constructed adjacent to the site. The proposal seeks to maintain a similar built form of the existing and recently approved and constructed buildings in the surrounding locality. The highest part of the development is situated centrally within the site, where it is least visually obtrusive.

It is considered that the proposed development will not be incompatible with the natural environment, or the existing and approved uses of the area.

The potential impacts of the proposal on this surrounding area are assessed in the following section.

3.2 Future uses of land in the vicinity

Land to the east, south and north of the site is anticipated to continue to be used for lower scale residential uses. The WLEP zones this land as R2 lower density residential, with heights between 8m-8.5m, and FSRs of 0.4:1. Land to the west of the site that has frontage to Penshurst Street is anticipated to have a greater height and density than the adjacent R2 zoned land. Under the WLEP, land fronting Penshurst Street is zoned R3 Medium Density

residential with heights between 9m-13.5m, and FSRs of 0.7:1 to 2:1. Future development along Penshurst Road is likely to continue to include higher density residential development as well as commercial uses. This land is currently in a state of transition, noting that not all of the properties have yet to be developed to the current planning controls. It is also noted that Council are in the process of reviewing the planning controls for the surrounding local centres, including the High Street Centre, East Village Centre, and Penshurst Street Centre which are within walking distance of the site. The preliminary studies indicate that these areas are identified for additional uplift in planning controls (height and FSR).

The indicative development will incorporate basement car parking that is accessed via Crabbes Avenue. The Seniors Housing subject to this SCC will provide sufficient parking and satisfy the requirements under the SEPP, and the site can readily accommodate the parking requirements generated from the proposal and will not require on-street parking. The Traffic and Parking Statement prepared by Colsten Budd Rogers and Kafes (**Appendix 4**) concludes that the proposal of this scale will have minor traffic generation and surrounding road networks will readily cater for the anticipated demand.

Noise generated from the proposed development is anticipated to be compatible with the surrounding future uses. This includes noise between the future club, as well as the seniors housing. The future DA will ensure that noise generating sources (e.g. deliveries and servicing of the club, patrons/visitors entering the site) are managed to minimise noise impacts to the adjoining properties. A detailed Acoustic Report will be prepared at DA stage to ensure there are no adverse noise impacts as a result of the development.

In conclusion, no identifiable impacts are likely to arise from the proposed seniors housing development to adversely affect surrounding land uses and vice versa. Rather, impacts are largely positive, due to synergies with existing and proposed site and surrounding uses. Therefore, it is considered that the proposed concept scheme for Seniors Housing is compatible with the anticipated future uses surrounding the site.

3.3 Available services and facilities

As described in **Section 2.1.4** of this report and in the accompanying Design Package (**Appendix 1**), the site satisfies Clause 26 accessibility criteria under the Seniors Housing SEPP. Specifically, the site is within 400 metres via an accessible travel path to bus stops located on Penshurst Street. These bus stops provide regular services and convenient access to several shopping centres, hospitals and medical services within the local area, and onward public transport connections servicing the rest of Sydney by rapid bus or train. In addition, the site is also within 400m walking distance to the East Village Centre, High Street Centre, and a public park. These shopping areas include an array of services and facilities that would reasonably cater for the needs of the future senior residents.

The site is also readily serviceable by existing utilities, including water, sewer, electricity, gas and telecommunication networks.

3.4 Provision of land for open space

The site is zoned RE2 Private Recreation. The long-term use of site has been for club premises, and associated social and recreational facilities. There are existing bowling greens on the land, however, we are informed that these are no longer used for this purpose due to maintenance and watering costs. The seniors housing development is an integral and integrated component of the proposed enhancement of the Club premises which will be re-developed and located along Penshurst Street improved presence from the public domain.

Whilst the proposal will see the removal of the un-used bowling greens, the development will include a park that has frontage to Crabbes Avenue. The proposed park is shown below in **Figure 15**.



Figure 15: Indicative Public Park, outlined in blue (Source: GMU)

The park will be available to the club members, residents of the seniors housing, and the general public for passive outdoor recreation. The park will include a variety of soft and hard landscaping elements to provide a space that provides amenity for various types of users. This includes a direct connection to/from the future Club for the purpose of undertaking memorial services and the like. The park will enhance the availability of public recreational opportunities to the surrounding opportunity, and is considered an improvement to the existing site.

The removal of the unused bowling greens will not have an adverse impact to the overall supply of active recreational space within the Willoughby LGA. There are various other active Bowling Clubs in the surrounding area including the Willoughby Park Bowling Club, Northbridge Bowling Club, and the Artarmon Bowling Club (to be upgraded soon). The Willoughby Leisure Centre is situated approximately 2km to the south of the site, which provides an array of facilities including netball courts, indoor swimming pool and more. Further, it is noted that the greens have no approval to be used for an alternate use, and that the use of the greens, elevated relative to the neighbouring low density neighbouring properties, for more "active" sporting codes is not desirable due to the amenity impacts. The future Club is anticipated to include a gymnasium that will be available to the members of the Club and local residents. This will also contribute to the available private recreation opportunities within the area. Further, it is noted that the surrounding R3 zone permits 'recreational areas' within the zone.

Open Space is readily available in the surrounding area, with various public parks in close proximity (1km) of the site.

3.5 Bulk, scale, built form and character

The accompanying Design Package (**Appendix 1**) describes the bulk, scale and built form of the seniors housing proposal in the form of indicative building envelopes.

The scale of the proposed seniors housing is broken up by a series of detached buildings that are situated on the site. The proposed built form has responded to the context of the surrounding development, both existing and as anticipated under Council's planning controls. In this respect, lower scale buildings (2-3 storeys) are situated along the boundaries that adjoin the heritage conservation zone and have an interface with residential dwellings. To Penshurst Street, the future club is to be three (3) storeys in height (noting the Club floor to floor heights are greater than a residential building), consistent with the existing and future anticipated development that fronts Penshurst Road. The tallest part of the development, has been centrally located on the site where it is less visible from the public domain and surrounding properties. Refer to **Figure 16** which demonstrates the built form across the site.

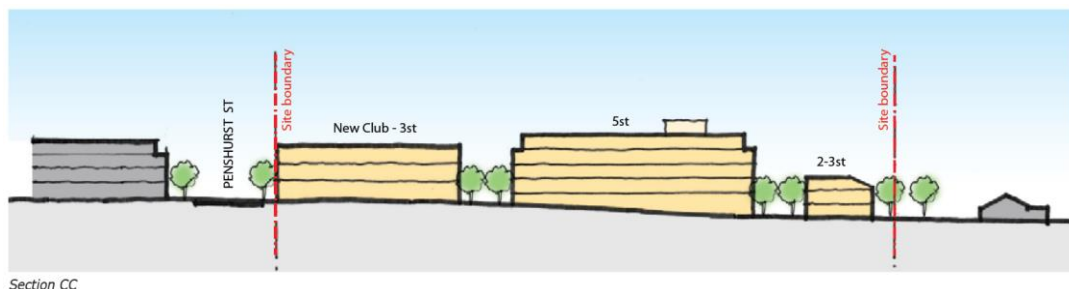


Figure 16: Indicative section through the site (Source: GMU)

Views from surrounding properties will not be largely affected as a consequence of the redevelopment of the site. Views in the surrounding area are generally limited to street level views, with taller buildings along Penshurst Road having general views of the surrounding district. The redevelopment of the site for seniors housing for the scale and height proposed will not result in any adverse view impacts to the surrounding properties.

A Heritage Impact Statement prepared by NBR Architecture is provided at **Appendix 3**, which provides an assessment of the indicative scheme and its impacts to the Horsley Park Conservation Zone. The HIS concludes the following:

"The proposal incorporates new buildings for which consideration of siting and setbacks allowing for the retention of the heritage significance of the heritage conservation area has been given. The proposed redevelopment of the subjects site is compatible with the requirements to retain the heritage significance of the adjacent Horsley Avenue Conservation Area and does not adversely affect the identified heritage significance of the contributing elements within the Conservation Area."

Detailed design of the buildings has not been undertaken, however the design principle will be to maintain a domestic appearance, through a high degree of articulation, a material palette compatible with surrounding development and a high quality landscape setting.

A preliminary shadow analysis has been undertaken by GMU and is provided at **Appendix 1**. The shadow analysis demonstrates that the proposed concept Master Plan does not cause any adverse overshadowing to the residential properties adjoining the site, and they will receive in excess of 3hrs direct sunlight between 9am and 3pm mid-winter. The majority of the shadows will fall on the site itself throughout the day.

With appropriate design, the proposal should be compatible with the character of the surrounding area.

4. Conclusion

This application seeks a site compatibility certificate to enable the development of seniors housing on the Club site, comprising:

- Approximately 99-125 self contained dwellings;
- Approximately 36-72 RACF beds and associated facilities;
- Approximately 378-406 car parking spaces;
- Building envelopes ranging between 2 storeys (8.5m) and 5 storeys (20.5m) in height;
- Floor Space Ratio of 1.35:1 of the future development on the site; and
- Public Park.

The proposed development would afford future residents a high level of accessibility to a range of services and facilities located in and around the Club Willoughby, and offers good public transport connections to services within the local area. Seniors living is compatible with the surrounding context. The proposed design is compatible with the surrounding built form, and would not result in the loss of any actively used open space in the area.

Overall, the benefits provided by the proposed development outweigh any potential impacts, and is therefore in the public interest.



APPENDIX 1

Design Package prepared by GMU Urban Design and Architecture



APPENDIX 2

Survey prepared CMS Surveyors Pty Ltd



APPENDIX 3

Heritage Impact Statement prepared by NBRS and Partners



APPENDIX 4

Traffic Statement prepared by Colston Budd Rogers and Kafes



APPENDIX 5

Pre-Consultation Report prepared by Urban Concepts



APPENDIX 6

Local Centre Studies prepared by Architectus on behalf of Willoughby City Council