

23 February 2026

Attention: Toung Vi Doan
Social & Diverse Housing Assessments
Department of Planning, Housing and Infrastructure

Dear Toung Vi Doan

Re: SSD-86878982 - Seniors Housing at No. 132-134 Beecroft Road, Beecroft

The following comments are provided for consideration and to assist the Department in the assessment of the SSD application.

Planning

It is noted that the development complies with the FSR and building height development standards.

It is recommended that the Department ensure that the development complies with the Seniors Housing Design Guide and the Apartment Design Guide.

Heritage

Council's heritage assessment provided the following comments:

HDCP Provision	Proposed Works	Heritage Comment
Aboriginal Cultural Heritage Part 9.2	Demolition Installation of services Earthworks Heavy vehicle movements	No heritage concerns raised An Aboriginal Cultural Heritage Assessment and Archaeological Report was prepared to assess and identify Aboriginal cultural values of the study area in support the proposed development. The methodology included: • Consultation with the Aboriginal community in compliance with consultation requirements • A search for Aboriginal Owners, Native Title Claims, Registered Indigenous Land Use Agreements • An archaeological survey with test excavations, and • Background historical research. The archaeological and historical significance was assessed as low and the site identified to be a disturbed landscape.

HDCP Provision	Proposed Works	Heritage Comment
		The studies recommended management and mitigation measures should be incorporated in any future development consent. The submission meets the HDCP requirements for addressing Aboriginal Heritage impacts for a proposed development.
Historical Archaeology Part 9.3	Demolition Earthworks	No heritage concerns raised A Historical Archaeological Assessment was prepared to assess and identify the historical archaeological resources of the study area in support the proposed development. The methodology in accordance with heritage guidelines included: • Identification of archaeological sites and preservation of archaeological resources • Background historical research • A physical inspection • An assessment of heritage significance and impact • Recommend mitigation measures The potential historical archaeological resource was assessed to not meet the threshold for local or state significance and the development to have no impact on significant historical archaeology. The study's recommended unexpected finds protocol should be incorporated in any future development consent. The submission meets the HDCP requirements for addressing Historical Archaeological impacts for a proposed development.
HCA's General: Part 9.6. Demolition Beecroft Cheltenham Plateau Precinct: Table 9.7-b: Demolition	Demolition	No heritage concerns raised The proposal seeks to demolish structures at No. 134 Beecroft Road, rear skillion, internal fabric, front fence and garage of the dwelling at No. 132 Beecroft Road. The heritage assessment provided in the Statement of Heritage Impact is supported, identifying that: No. 134 Beecroft Road • demolition would have no impact as none of the existing structures contribute to the HAC. No. 132 Beecroft Road • removing the rear skillion will have a minimal and acceptable impact as it is in poor condition, primarily replaced fabric, not highly visible from the public domain and would not impact the contribution of the dwelling to the HCA.

HDCP Provision	Proposed Works	Heritage Comment
		- internal demolition/alterations will not be visible from the public domain (noting the principal rooms and central hallway layout is to be retained). - the front fence is later fabric, in poor condition and of no heritage significance. - the garage is a later structure, of no heritage significance and makes no contribution to the HCA. The proposal has responded to the heritage advice provided under PL/9/2025 to meet the HDCP requirements for demolition in an HCA.
HCA's General: Part 9.6.1: Tolerance for Change Beecroft Cheltenham Plateau Precinct: Table 9.7-b Streetscape character	Relocation Adaptive reuse	No heritage concerns raised The proposal seeks to move the retained section of the dwelling at No. 132 Beecroft Road and restore the extant fabric. The heritage assessment provided in the Statement of Heritage Impact is supported, identifying that: Relocation - setbacks are consistent with the front setback of dwellings of a comparable size and period along Beecroft Road. - it would not result in the loss of a significant garden setting or block significant view corridors. - it would not interrupt a significant or related group of dwellings - it would mitigate a poor design outcome, visual impacts and connection issues with construction of a new building - Mammoth Movers hold the requisite skillsets and equipment to facilitate the relocation and raising of masonry buildings and "sees no insurmountable impediments to the relocation of the house." Adaptive reuse - The dwelling has not been used for more than storage for several years - is appropriate to the original use - the layout of the principal rooms and central hallway will be retained - wall nicks and headers will be retained where new openings are proposed - restoration will have a positive impact to ensure long-term survival of significant fabric and contribution to the HCA

HDCP Provision	Proposed Works	Heritage Comment
		The proposal has responded to the heritage advice provided under PL/9/2025 to meet the HDCP requirements for Tolerance for Change, of a contributory dwelling in an HCA.
HCA's General: Part 9.6.20: Infill Buildings Beecroft Cheltenham Plateau Precinct: Table 9.7-b	New Seniors Living facility	Heritage concerns addressed The proposal seeks to construction of a large new, fit-for-purpose residential aged care facility across the site. The heritage assessment provided in the Statement of Heritage Impact identifies that: Siting and Setbacks - there is no consistent pattern of setbacks along Beecroft Road. - the proposed setback would not block significant view corridors to/from the heritage item (No. 130 Beecroft Road) or contributory item (No. 136 Beecroft Road) as their setback, front planting and high walls conceal them from the public domain. - the proposed setback allows for a deep landscape forecourt. - only a narrow section of the new building would be sited forward of adjoining dwellings and in line with the relocated dwelling. - majority of the building would be set behind the rear building line of the relocated dwelling and a landscaped forecourt. - side setbacks are similar the established pattern in the street and are improved along majority of the south-eastern and north-western boundaries. - link between new building to the existing dwelling is single storey, at the rear, narrower than the existing dwelling, is set below the gutter line of the retained roof to provide sufficient separation. Bulk, Mass and Scale - replaces an existing two-storey building on the site. - the footprint, mass and scale are greater than existing to provide a fit for purpose facility. - mitigation measures are utilised consistent with the <i>Design in Context</i> guidelines by NSW Heritage Office (2005) to reduce the inherent impacts. - is in keeping with existing large-scale buildings in the wider vicinity (aged care facilities, Cheltenham House and Cheltenham Girls High School)

HDCP Provision	Proposed Works	Heritage Comment
		- managed through articulation (horizontal and vertical modulation), a series of wings and central core separated by landscaped courtyards Height - complies with the 9.5 height limit - third floor managed by increased setbacks, modulation, articulation; use of a flat roof form and by careful material and colour selection. - Existing canopy trees and new planting would obscure upper levels from public domain views. Roofs - deliberate design to not replicate typical pitched roofs of the HCA. - A pitched roof on a building of this type would be overwhelming to the relocated dwelling and immediate neighbours. - common design employed to minimize mass and scale to create a roof line subservient to the complex hips and gables of contributory buildings. Materials and finishes - the proposed materials and colours reference materials in the HCA in a contemporary manner - include stone, face brick and aluminium cladding, timber look posts, powder coated aluminium windows and metal work balustrades. Architectural Style - the front elevation demonstrates asymmetry and compliments contributory buildings in form and detail. - elevations entail appropriate solid to void ratio. - glazing retains a vertical emphasis The proposal has responded to the heritage advice provided under PL/9/2025 to address the HDCP requirements for general development and infill buildings within an HCA. The New Seniors Facility is not strictly compliant with the desired outcomes or prescriptive measures under; however, it is contemporary building to serve a specialised service with a general consistency in building height, scale, siting, setbacks, materials and finishes. It would present as a purpose-built modern development within the residential setting, with a clear contrast between new and old.

HDCP Provision	Proposed Works	Heritage Comment
HCA's General: Part 9.6.21: Senior Housing	New Seniors Living facility	Heritage concerns raised The proposal seeks to construct a large new, fit-for-purpose residential aged care facility across the site with the following garage and open space arrangements: • A circular driveway with a central entry to the site with a concrete finish. • A service driveway to the basement carpark on the southern boundary • Fenced communal/private open space in the landscaped front setbacks The resident carpark spaces will not be visible from the public domain, and the driveways are limited to two for the combined sites with driveway crossings located similar to the existing. Communal open spaces in the front setback and adjacent the entry are to be fenced with gates. Fencing of open space in the landscaped front setback is not compliant with the HDCP requirements for Senior Housing in an HCA.
HCA's General: Part 9.6.16: Fencing and Gates	Boundary fencing	No heritage concerns raised The proposal seeks to construct: • a 1.2m brick wall with hedging and palisade fence up to 1.8m in front of No. 134 Beecroft Road. • a 1.8m palisade fence is proposed in front of No. 132 Beecroft Road. The new fencing replaces an existing fenced front boundary and is sympathetic in colour, material, height, and design to the streetscape character and characteristic fences along Beecroft Road. The proposal meets the HDCP requirements for gardens and landscaping within an HCA.
HCA's General: Part 9.6.17: Gardens and Landscaping	Landscaping Tree Removal	No heritage concerns raised The proposal seeks to undertake extensive landscaping including the removal of 9 trees, new planting throughout the site and new boundary fencing. Landscape finishes include paving, concrete pathways, meadow of grasses, terrace gardens and planting of a variety of native and non-native trees, shrubs, palms, grasses and ground covers. The heritage assessment provided in the Statement of Heritage Impact is supported, identifying that: Pre-1943 paths/driveway

HDCP Provision	Proposed Works	Heritage Comment
		- removal would have a tolerable impact because they are not part of a significant garden layout and are difficult to read from street level - new landscaping would provide a garden setting appropriate the relocated Inter-war period dwelling. Trees - the most notable canopy tree (Tree 1 - Blue Gum) is to be retained. - majority of the well-established trees, notably those along the front and north-western boundary (adjacent the heritage item) are to be retained. - removal is limited to those that are dead, have major encroachment to facilitate the development or of low retention value to facilitate the new landscaping plan. New Planting - the proposed tree canopy will improve canopy coverage and extend the existing canopy from the boundaries into the site. - provide improved amenity and help integrate the new development into the HCA setting. The proposal meets the HDCP requirements for gardens and landscaping within an HCA.
Development in Vicinity of Heritage Items and HCAs Part 9.13	New Seniors Living facility	No heritage concerns raised The heritage assessment provided in the Statement of Heritage Impact is supported, identifying that: <i>Ramona</i>, No. 130 Beecroft Road - there will be no impact on the item fabric or significant views, which are concealed by high fencing and vegetation - mitigation measures are utilised to reduce impacts on the setting, such as setbacks, retention of established trees, flat roof design, subdued colour palette and building articulation. <i>Carmel</i>, No. 115 Beecroft Road, Beecroft - there will be no impact on the item fabric or significant views - Beecroft Road provides a strong physical and visual barrier between this item and the site. <i>Combanning</i>, No. 140 Beecroft Road, Beecroft - there will be no impact on the item fabric or significant views

HDCP Provision	Proposed Works	Heritage Comment
		- the distance and intervening dwellings provide a strong physical and visual barrier between this item and the site. - mitigation measures are utilised to reduce impacts on the setting, such as setbacks, retention of established trees, flat roof design and subdued colour palette. <i>Street trees</i>, Boronia Avenue, Beecroft - there will be no impact on the listed trees or view corridors - mitigation measures are utilised to reduce visual impacts such as retention of established trees, new landscape planting and a subdued colour palette. The proposal responds to the HDCP requirements for development in the vicinity of heritage items.

The proposed scheme to construct a new Seniors Living facility has responded to the previous heritage advice provided by Council under PL/9/2025. The contributory dwelling would be retained (albeit moved forward on the site) and the heritage impacts in terms of scale, height, roof form, front setbacks, architectural design and materials have been addressed through mitigation measures consistent with the *Design in Context* guidelines for infill development effecting heritage items and HCAs and the HDCP controls.

Justification, however, has not been provided for the fencing and gates to the communal open space areas in the front landscape areas, which is inconsistent with the HDCP requirements for Senior Housing in a HCA and should be deleted from the proposal.

Traffic and Road Safety

Council's traffic and parking assessment concludes that the total off-street parking provision should be 49 car spaces based on the requirements of Clause 107 of SEPP Housing 2021 and the requirements for visitor car parking in the Hornsby Development Control Plan 2024.

The proposed development provides 55 off-street parking spaces and satisfies this requirement.

Traffic Generation is not considered as an issue for the proposed development as the net increase for the proposed development is around 10 vehicles during peak hours.

It is noted that a bus stop is located at the front of the site. It is anticipated that the development will increase the patronage at this bus stop.

Conditions should be imposed requiring:

- All vehicles are to enter and leave the site in a forward direction from/to Beecroft Road.
- Any proposed landscaping and/or fencing must not restrict sight distance to pedestrians and cyclists travelling along the footpath.
- A bus shelter be provided at the bus stop in front of the site.

Waste

Council's Waste Management Team provided the following advice for consideration in the assessment:

Operational Waste Management Plan

The operational waste management plan (OWMP) allows for 3 x 1100L garbage bins collected 3 times per week, or 74 L/bed/week. This garbage generation rate is unacceptably low. Actual figures from existing RACF indicate the garbage generation rate should be 100 L/bed/week. This means the site will need 4 x 1100L garbage bins collected 3 times per week.

The OWMP allows for 3 x 1100L recycling bins collected 2 times per week, or 49 L/bed/week. This recycling generation rate is acceptable. Actual figures from existing RACF indicates recycling generation at around 40 L/bed/week with a cardboard: mixed recycling ratio of 3:1. This would indicate that the site will need 2 x 1100L cardboard bins collected 2 times per week and 1 x 1100L mixed recycling bin collected 1 time per week.

The OWMP states that garden organic waste will be removed from the site by the garden maintenance contractor. This is acceptable.

The OWMP does not make any provision for food organics bins which is not acceptable. In accordance with the Protection of the Environment Operations Act, bins must be provided for the separate collection of food organics waste by 1 July 2026 or upon commencement of operation, whichever is later. The South Australia Waste & Recycling in Aged Care Facilities, Best Practice Guide Sept 2018 reports food organics waste to be 2.4 kg/bed/week for an average RACF. 240L bins have a weight limit of 70 kg (above which they are very difficult to move and can break during the bin lift). Based on this weight limit, the RACF will need 5 of 240L FO bins per week. Note that the density of food organics waste is estimated at 0.505 to 0.860 kg/L (due to its high water content) compared to general waste with a density of 0.131 kg/L (NSW EPA Better practice guide to resource recovery in residential developments), so the estimated volume of FO is 400-680 Litres per week. Therefore, separating FO from the general waste stream will not reduce the number of garbage bins required for the site.

There is sufficient space in the bin storage room/waste room for 4 x 1100L garbage bins and 3 x 1100L recycling bins plus aisle space to access and manoeuvre the bins, but there is very little other space for FO bins. It should be possible to fit 2 x 240L FO bins in the room, which will require a 3 times per week collection frequency. A higher collection frequency than weekly for FO will aid the control of odour.

The kitchen staff will most likely want the FO bin (and potentially also a paper/cardboard or mixed recycling bin) in the kitchen during working hours then transfer it to the bin storage room at the end of the workday. Decanting 46 kg/day of food waste from kitchen bins into the FO bins is not recommended on workplace health and safety grounds. The bin carting route from the kitchen to the bin storage room includes stairs – it is not practical to cart bins over stairs. The floor of the bin storage must be at the same level as the loading bay (as shown on the plans) – bins cannot be serviced from the raised loading dock so raising the floor of the bin storage room to the kitchen level is not a solution. A goods lift, bin hoist, scissor lift, or equivalent that is capable of transferring bins between the bin storage room/loading bay level (RL 130.20) and the kitchen/raised loading dock level (RL 131.2) is required.

The OWMP allows for clinical waste bins which are to be stored within the dirty utility rooms. Clinical waste is to be collected separately from other waste streams by authorised special waste collection service providers. This is acceptable.

Waste Collection Vehicle Access

The Environmental Impact Statement on page 120, very much underestimates the number of waste collection vehicles servicing the site per week. There will be 3 collections for garbage, 2 collections for cardboard, 1 collection for mixed recycling, 3 collections for food organics, and 1 collection for clinical waste. This is 10

trucks per week for waste collection services, not the 3 stated. This also means that there will be 6 or more vehicles per day using the loading bay not the maximum of 3 stated in the EIS. The only way to reduce the number of waste collection vehicles attending the site each week is to significantly increase the size of the bin storage room/waste room so it can hold 3 times as many bins which will involve significant design changes of the back of house areas of the ground floor.

Onsite access is provided for a medium rigid waste collection vehicle. Swept paths have been provided in the Traffic Report showing MRV can enter the site in a forward direction, turn around and exit in a forward direction. Turning is only possible if there is no other vehicle in the loading bay. Given there will typically be 6+ deliveries per day, there should be a flashing light visible to vehicles approaching to enter the site notifying incoming vehicles that the loading bay is occupied. This is to prevent trucks entering the site and finding they are unable to turn around because the loading bay is occupied, then having to reverse all the way out and into the traffic on Beecroft Road.

A section drawing along the access driveway has not been provided. From the other section plans, the vertical clearance along the MRV travel path appears to be 4m which does not comply with AS2890.2 which requires 4.5m for medium rigid vehicles. Most waste collection vehicles are 3.5-3.8m high, so the 4.5m clearance provides flexibility for ceiling mounted objects (such as plumbing pipes from the floor above, cable trays, ventilation ducting etc.) and avoids fire alarm sensors being set off by the truck's exhaust. The vertical clearance of 4m does not allow for ceiling mounted objects over the truck's travel path, which is only a problem if such objects need to be there. There appears to be several bathrooms located above the waste collection vehicle travel path which may cause the vertical clearance to drop well below 4m. A minimum vertical clearance of 4m must be maintained.

Vegetation and Tree Impacts

Council's Tree Management Team have raised no objections to the proposal and can provide recommended conditions of consent.

However, it is noted that the EIS states that: "Replacement: 49 trees (of a height of 5m or greater) and an additional 31 trees (of 5m in height or less).

Council would recommend that a minimum of 10 replacement trees have a mature height of at least 15m and this should be reflected on an amended landscape plan.

Engineering

Based on Council's engineering assessment the following information shall be provided:

1. Easement to Drain Water

The existing inter-allotment drainage system within the existing Easement to Drain Water over 0.5 wide (N880896) and Easement for Drainage of Water 0.7 wide (3693921) over Lot D DP320459 does not benefit Lot F DP15298, No. 132 Beecroft Road, Beecroft.

Legal documents shall be provided to demonstrate that Lot F DP15298 and Lot C DP317843, Nos. 132 and 134 Beecroft Road, Beecroft is a beneficiary of the Easement.

2. Hydraulic Grade Line Calculations

The proposed OSD system discharges directly to the public drainage system in Beecroft Road that is proposed to be extended to the street frontage of the development site. Hydraulic grade line calculations shall be provided to demonstrate that the OSD is not affected by back water affects from the public drainage system.

Environmental Protection

Council's Environmental Protection Team has reviewed the application and has found it to be insufficient in information. The following information is to be provided before further assessment of the application can occur:

1. Detailed Site Investigation and Remediation Action Plan

An updated Detailed Site Investigation and Remediation Action Plan is required to be submitted including the additional information specified in items a. and b. below.

The updated documentation must be prepared:

- by a certified land contamination consultant recognised under the Certified Environmental Practitioners Scheme - Site Contamination (CEnvP(SC)) or the Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) certification, and
- in accordance with NSW Environmental Protection Authority's (NSW EPA) contaminated land guidelines and the *National Environment Protection (Assessment of Site Contamination) Measure 1999* (National Environmental Protection Council, May 2013) ("NEPM ASC 2013"),

a) Detailed Site Investigation (DSI)

- i. A separate site plan clearly identifying the location and extent of the Areas of Concern (AEC) AEC 1, AEC 2 and AEC3 as identified in the Conceptual Site Model.
- ii. Field Descriptions of soils in accordance with Schedule B2, section 7.3 of NEPM ASC (2013) including visual inspection records for all test pits clearly identifying the presence/absence of suspected ACM.
- iii. Explanation of how the laboratory sampling and analysis plan was determined and, in relation to AEC-1, rational for restricting the sampling and laboratory analysis to only test pits located within the eastern and south-western areas of the rear yard - corresponding with the 'Fill Remediation' area - however the DSI identifies the *'turfed backyard area located in the southern portion of the site'* (not part thereof) as an Area of Concern (AEC-1) and the presence of fill is recorded in the DSI Appendix D Test Pit Logs identifying TP4, TP5, TP 7, TP 9 and TP10.
- iv. Explanation how the limit of the area requiring remediation, labelled 'Fill Remediation' in Figure 3 of the DSI (also Figure 3 of the RAP) was determined given there is no record of further investigation either via test pits/ and/or trenches, of soils between test pits TP1, TP2, TP3 and TP8 and test pits TP4, TP5, TP 7, TP 9 and TP10 and it is therefore unclear how the extent of asbestos contamination has been delineated.
- v. Discussion of the contamination status of the area corresponding within and in the general vicinity of the Proposed Asbestos Containment Cell location identified in Figure 4 of the Remediation Action Plan, noting that in accordance with the preferred Remediation Option 3 in the RAP, excavation to 3mbgl will be required across an area of approximately 100m² in this location generating 300m³+ of excavation material that has not been subject to laboratory testing and analysis (despite being identified as part of AEC 1 and test pit logs recording the presence of fill) that will need to be managed as part of the remediation works.
- vi. Updated 'HIL' criteria and conclusions, including information addressing the following concerns:

- a. The DSI concludes that the site can be made suitable for its intended land use as HIL B Residential - minimal opportunities for soil access.
- b. Volume 2, Section 2.2 of NEPM ASC, 2013 describes the 'HIL B' land use setting as:

‘residential with minimal opportunities for soil access includes dwellings with fully and permanently paved yard space such as high-rise buildings and flats’.
- c. However, the proposed Architectural Plans and Landscape Plans indicate the development will incorporate numerous areas of accessible soils, including areas to remain unexcavated (see Landscape Plan set, Drawing DA110.01, Revision DA06) which is inconsistent with the 'HIL B' land use setting.

b) Remediation Action Plan

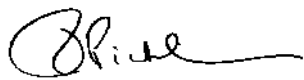
- i. Separate Site Plan clearly identifying the location and extent of the Area of Concern AEC 3 requiring further investigation as part of the recommended data gap analysis.
- ii. 'HIL' Validation Criteria and Site Acceptance Criteria appropriate to the proposed land use setting and consistent with the updated DSI.
- iii. Detailed Validation Sampling and Analysis Quality Plan (SAQP) including identification of required analytic suites and sampling densities
- iv. Detailed data gap analysis Sampling and Analysis Quality Plan relating to the areas situated below existing site structures on both lots, including identification of required analytic suites, sampling densities and acceptance criteria.
- v. Updated Figure 4 Proposed Containment Cell plan showing the Tree Protection Zones of trees to be retained consistent with the plan in Appendix 2 of the Arboricultural Impact Statement, prepared by Jamie Oates, dated November 2025.

2. Site Audit Statement

- a) The updated Detailed Site Investigation and Remediation Action Plan shall be reviewed by a NSW EPA Accredited Site Auditor (Site Auditor) as defined under the *Contaminated Land Management Act 1997*.
- b) In accordance with Section 4.6 of the *Managing Land Contamination Planning Guidelines*, the Site Auditor shall review the DSI, RAP and other relevant plans and documentation relating to the proposed Residential Aged Care Facility at the development site, with regard to the adequacy of the site investigation and proposed remediation strategy and the adherence to the relevant standards, procedures and guidelines.
- c) The Site Auditor shall provide a non-statutory, Section B2 Site Audit Statement in an approved form in accordance with the *Contaminated Lands Management Act 1997*, which shall be submitted to Council.

Council can be in a position to provide conditions of consent, once the additional information is received and the Department confirms that there will be no further changes to the design.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Pickles', with a long horizontal flourish extending to the right.

Rodney Pickles
Manager, Development Assessments
Planning and Compliance Division

TRIM Reference: SSD/3/2025