

WILLOWTREE PLANNING



22 June 2026

REF: WTJ21-365

NSW Department of Planning, Housing and Infrastructure
Housing Delivery Authority and SSD Assessments
Locked Bag 5022
Parramatta NSW 2124

Attention: Kweku Aikins,

**RE: REQUEST FOR INDUSTRY-SPECIFIC SEARS
PROPOSED SENIORS HOUSING DEVELOPMENT
PROPERTY AT 1A AND 1-7 CARLOTTA AVENUE, GORDON (LOTS 1 & 2 DP1116826)**

Dear Kweku

We write on behalf of Uniting (the Proponent) to the NSW Department of Planning, Housing and Infrastructure (DPHI) in support of a request for industry-specific Secretary's Environmental Assessment Requirements (SEARs). The intent of the letter is to demonstrate that the proposal is eligible for industry-specific SEARs.

The proposal involves the construction of a seniors housing development comprising a Residential Aged Care facility (RAC) and Independent Living Units (ILUs), including a component of affordable housing, located at 1A and 1-7 Carlotta Avenue, Gordon legally described as Lot 1 & 2 DP1116826 (the Site).

The Site is located within Ku-ring-gai Local Government Area (LGA) and is zoned R4 High Density Residential, pursuant to *Ku-ring-gai Local Environmental Plan 2015* (KLEP2015). The proposed development is defined as 'seniors housing', which is permissible with consent in the R4 High Density Residential zone pursuant to the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP).

The proposed development seeks consent for the construction and operation of a seniors housing development comprising a RAC and ILUs, including a component of affordable housing, with a total Estimated Development Cost (EDC) of \$445,602,300 (ex GST). Refer to **Appendix 2** for a Cost Plan of the development, prepared by MBM. The proposed development satisfies the definition of State Significant Development (SSD) pursuant to:

- Clause 4(1)(n) of *State Significant Development Declaration Order (No 4) 2026* (SSD Order No.4 2026), being *development specified in EOI application 290553 dated 3 September 2025 including development for the purpose of seniors housing with provision of affordable housing at 1A and 1-7 Carlotta Avenue, Gordon being Lot 1/DP1116826, Lot 2/DP1116826.*

This letter provides an overview of the proposed development and the relevant planning framework that applies to enable the issuance of industry-specific SEARs, which would then guide the preparation

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of a formal Environmental Impact Statement (EIS) as part of a State Significant Development Application for the proposed development. As declared by the Housing Delivery Authority (HDA), the proposed SSD would also constitute a concurrent Planning Proposal (PP) to increase the maximum building height and to add seniors housing as an additional permitted use (APU) at the Site under KLEP2015. It is requested that the documentation required for the concurrent PP also be issued at this time.

The proposal is considered to meet the criteria for industry-specific SEARs given:

- It does not constitute Designated Development;
- It is wholly permissible pursuant to the Housing SEPP; and
- It does not involve a concept development application (DA).

The following sections provide an overview of the proposal to inform the DPHI's decision making for the issuance of industry-specific SEARs.

1.0 SITE DESCRIPTION

The Site is located at 1A and 1-7 Carlotta Avenue, Gordon, legally described as Lots 1 and 2 DP1116826. The Site is approximately 16,106.15m² in area.

The Site has a primary frontage of approximately 138.70m to Carlotta Avenue to the north which will provide future vehicular and pedestrian access to the development for residents, visitors and staff.

The Site is bounded by Carlotta Avenue to the north, high density residential to the east, the 'T1' Railway line zoned SP2 Infrastructure (Railway) to the south, and Mona Vale Road zoned SP2 Infrastructure (Classified Road) to the west. The Site is well serviced by road and transport infrastructure, in close proximity to Mona Vale Road, Pacific Highway and Ryde Road which provide connectivity to the Sydney Central Business District (CBD), located 17.7km southeast of the Site, and wider Ku-ring-gai area. The Site is also well serviced by public transport, located approximately 900m from Gordon Train Station and 550m from bus stops located on Pacific Highway.

The Site is within a prime location for seniors housing, being in close proximity to Sydney Adventist Hospital (approximately 7.4km northwest), Macquarie University Hospital (approximately 7.2km southwest) and Royal North Shore Hospital (approximately 10km southeast). The Site is also in close proximity to other Health Services including Gordon 7 Day Medical Centre (approximately 1km southeast), Pymble Grove Health Care (approximately 1.4km south), and Harbour Radiology Pymble (approximately 1.6km northwest). The Site is also located 900m from Gordon Centre Shopping Mall.

The existing site context is shown in **Figure 1** and **Figure 2** below.



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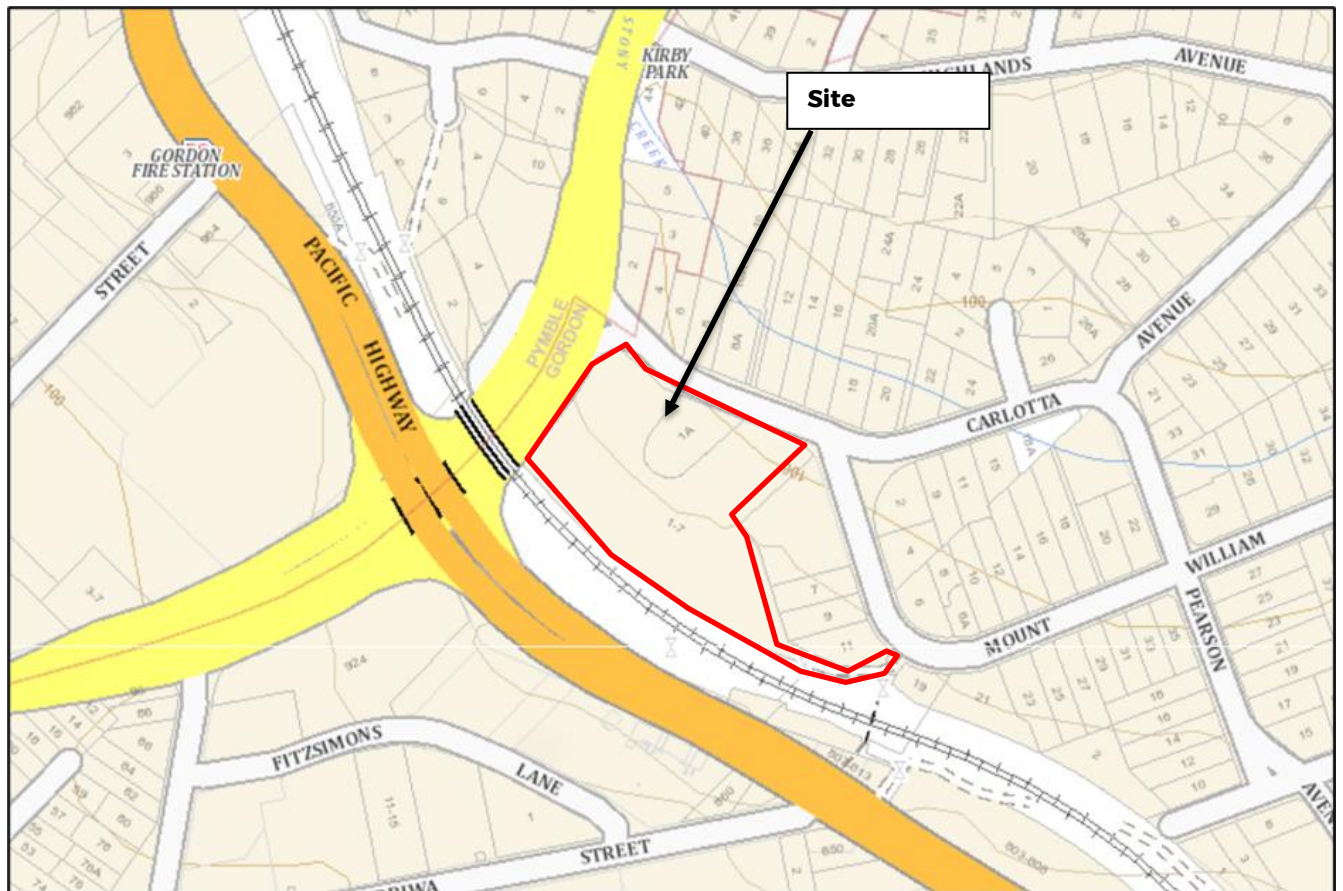


Figure 1. Cadastral Map (Source: SIX Maps, 2023)

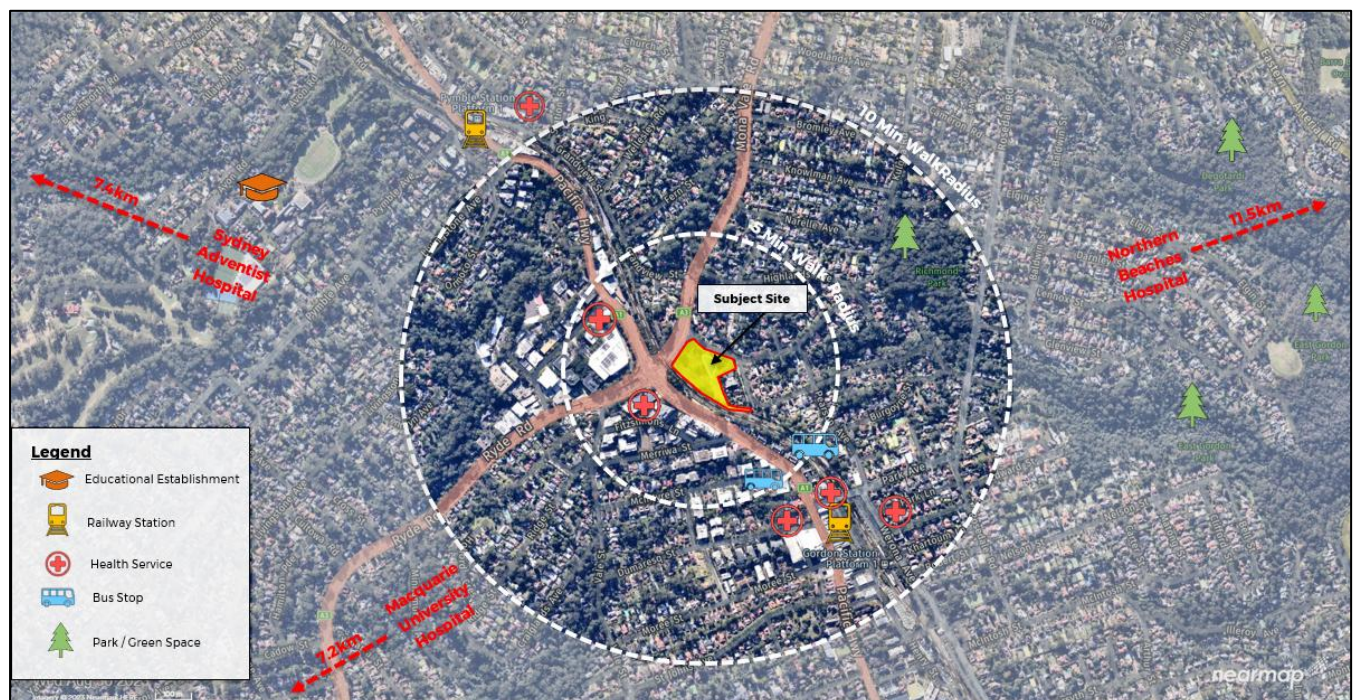


Figure 2. Site Context Map (Source: Willowtree Planning, 2023)

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2.0 PROPONENT DETAILS

The Proponent for this proposal is Uniting (NSW.ACT) as identified in **TABLE 1** below.

TABLE 1: PROPONENT CONTACT DETAILS	
Company Details	Uniting (NSW.ACT)
Contact Name	Carolyn Yeow
Position	Development Manager
Contact Number	0402 358 534
Email Address	cyeow@uniting.org

3.0 ESTIMATED DEVELOPMENT COST

The EDC of the proposed development, in accordance with the EDC definition under the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), is estimated based on the scope of works outlined in **Section 4.0** below.

A Cost Plan has been prepared by MBM and included in **Appendix 2**, which estimates that the proposed development would have a total EDC of \$445,602,300 (ex GST).

4.0 PROJECT DETAILS

The proposal will seek development consent for the construction and operation of a seniors housing Development comprising a RAC and ILUs. Preliminary Architectural Plans have been prepared by Architectus and are provided within **Appendix 1**.

The particulars of this proposed development are summarised below:

- Earthworks involving cut and fill;
- Tree removal;
- Augmentation of existing services and infrastructure such as water, power, and sewer;
- Construction of basement car parking comprising approximately 328 car parking spaces;
- Construction of a RAC, including:
 - Approximately 90 residential aged care rooms;
 - Consulting rooms and staff administration areas;
 - Ancillary land uses including a salon, cafe, and chapel;
- Construction of ILU buildings, including:
 - Approximately 235 ILUs, including 23 affordable housing units;
 - Ancillary use including clubroom, gym, swimming pool and cinema
- Construction of a proposed driveway on Carlotta Avenue; and
- Provision of associated landscaping.



5.0 STATUTORY CONTEXT

All relevant statutory documentation will be considered as part of the future EIS. The following statutes and policies have been considered as part of the development planning phase. Further consideration will be given to all relevant and applicable legislation and strategic plans in the EIS.

Commonwealth Planning:

- *Environment Protection and Biodiversity Conservation Act 1999*

State Planning:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Protection of the Environment Operations Act 1997*
- *Biodiversity Conservation Act 2016*
- *Water Management Act 2000*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Housing) 2021*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *Apartment Design Guide and Seniors Housing Design Guide*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*

Local Planning:

- *Ku-ring-gai Local Environmental Plan 2015*

5.1 Commonwealth Environment Protection and Biodiversity Conservation Act 1999

Under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species) must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval at a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a “controlled action” and formal Commonwealth approval is required.

The requirements of the EPBC Act will be considered as part of the forthcoming EIS.

5.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the overarching governing statute for all development in NSW and pursuant to Part 4, the proposal is considered SSD under the SSD Order No.4 2026 and *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP).

5.2.1 Section 4.15(1) of the EP&A Act 1979

Section 4.15(1) of the EP&A Act specifies the matters that a consent authority must consider when determining a DA. The forthcoming EIS will consider and address all matters outlined in Section 4.15 of the EP&A Act.



5.3 Environmental Planning and Assessment Regulation 2021

Section 7(1) of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) states that:

“Development described in Schedule 3, Part 2 is declared to be designated development for the purposes of the Act unless it is not designated development under Schedule 3, Part 3.”

The proposed development being for seniors housing does not trigger the Designated Development thresholds.

5.4 Protection of the Environment Operations Act 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an ‘activity’ for the purposes of the POEO Act is:

“an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal).”

The proposed development will not seek consent for the storage of dangerous goods.

5.5 Biodiversity Conservation Act 2016

The *Biodiversity Conservation Act 2016* (BC Act) and *Biodiversity Conservation Regulation 2017* (BC Regulation) seek to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development.

Part 7 of the BC Act sets out requirements for biodiversity assessments and approvals under the EP&A Act.

Pursuant to Section 7.2(1) of the BC Act, development or an activity is likely to significantly affect threatened species if:

- (a) it is likely to significantly affect threatened species or ecological communities, or their habitats, according to the test in section 7.3, or*
- (b) the development exceeds the biodiversity offsets scheme threshold if the biodiversity offsets scheme applies to the impacts of the development on biodiversity values, or*
- (c) it is carried out in a declared area of outstanding biodiversity value.*

Pursuant to Section 7.9 of the BC Act, an SSD “is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values”.

The Site is mapped as containing areas of biodiversity value and as such the proponent will prepare a Biodiversity Development Assessment Report.



5.6 Water Management Act 2000

The objective of the WM Act is the sustainable and integrated management of the state's water for the benefit of both present and future generations.

Section 91 relates to Activity Approvals and outlines that an aquifer interference approval confers a right on its holder to carry out one or more specified aquifer interference activities at a specified location, or in a specified area.

For the purposes of the WM Act, aquifer interference activity means an activity involving:

- a) *the penetration of an aquifer,*
- b) *the interference with water in an aquifer,*
- c) *the obstruction of the flow of water in an aquifer,*
- d) *the taking of water from an aquifer in the course of carrying out mining, or any other activity prescribed by the regulations,*
- e) *the disposal of water taken from an aquifer as referred to in paragraph (d).*

Should the proposed development involve excavation that is below the existing ground water level, it may require an aquifer interference approval under the WM Act. Consultation with WaterNSW and the Department of Climate Change, Energy, the Environment and Water – Water Group (DCCEE – Water) would be undertaken.

5.7 State Environmental Planning Policy (Planning Systems) 2021

Chapter 2 of the Planning Systems SEPP contains planning provisions relating to State and regionally significant development. The proposed development has been declared to be SSD pursuant to the SSD Order No.4 2026, as set out above. The forthcoming EIS would consider and address all matters outlined in Part 2.2 of the Planning Systems SEPP.

Clause 4(1)(n) of the State Significant Development Declaration Order (No 4) 2026 declares as SSD development specified in EOI application 290553 dated 3 September 2025 including development for the purpose of seniors housing with provision of affordable housing at 1A and 1-7 Carlotta Avenue, Gordon being Lot 1/DP1116826, Lot 2/DP1116826.

Accordingly, the proposed development is declared to be SSD and the relevant SSD assessment provisions of the EP&A Act apply.

5.8 State Environmental Planning Policy (Housing) 2021

State Environmental Planning Policy (Housing) 2021 (Housing SEPP) provides a framework within the state of NSW to carry out housing development. Part 5 of the Housing SEPP is specific to *Housing for seniors and people with a disability*. The proposed development also provides a component of affordable housing, comprising 23 of the proposed ILUs, which would be designed to comply with the relevant provisions of the Housing SEPP.

The Site is zoned R4 High Density Residential which is a prescribed zone under Part 5, Division 1, Clause 79 of the Housing SEPP. Clause 81 states that development for the purpose of seniors housing may be carried out by any person with consent on land to which that Part applies. As such the proposed development is permissible with consent subject to the provision of the Housing SEPP.

TABLE 2 outlined below includes a summary of proposed development against Part 5 of the Housing SEPP.



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TABLE 2: HOUSING SEPP PROVISIONS

Clause	Comment
Clause 79 – Land to which Part applies	It is noted that Part 5 of the Housing SEPP applies to the R4 High Density Residential zone. The Site is zoned R4, for which the proposed development is able to be undertaken pursuant to the Housing SEPP.
Clause 80 – Land to which Part does not apply – general	The Site is not identified under Clause 80; therefore, the Site is suitable for the proposed development.
Clause 81 – Seniors housing permitted with consent	The Site is identified on land to which this part applies pursuant to Clause 79. As such, the proposed development is able to be undertaken pursuant to the Housing SEPP.
Clause 83 – Amendments to the bush fire evacuation risk map	The Site is not located on land mapped as bushfire prone land.
Clause 84 – Development standards – general	The proposed development will satisfy the general development standards where applicable. The EIS will be supported by an Architectural Design Statement that will consider Clause 84 and the other relevant provisions under the Housing SEPP.
Clause 85 – Development standards for hostels and independent living units	The proposed development includes provision for ILUs on the Site. Schedule 4 of the Housing SEPP has been considered below with respect to standards applying to ILUs.
Clause 87 – Additional floor space ratios	Subclauses 87(2)(b)(iii) & (c) would apply to the proposed development on the R4 zoned land, for which a 25% bonus Floor Space Ratio (FSR) can be applied, as well as an additional 3.8m in maximum building height. The proposed development would be designed to comply with the maximum FSR. An increase to the maximum building height would be sought through the concurrent PP, rather than by way of a Clause 4.6 variation request.
Clause 88 – Restrictions on occupation of seniors housing	It is confirmed the proposed operational requirements of the proposed development will remain consistent with the provisions of Clause 88 as the use will pertain to seniors housing/aged care to be wholly operated by Uniting.
Clause 90 – Subdivision	Subject to approval (and as a condition of consent), the allotments pertaining to the Site will be consolidated accordingly.
Clause 91 – Fire sprinkler systems in residential care facilities	The proposed development will be supported by a fire engineering strategy, including fire sprinkler systems, for which Fire and Rescue NSW will be consulted with as part of the SSD Application process to understand any key matters for consideration. Accordingly, early consultation will be undertaken during the FEBQ process and subsequent FER process, subject to approval, so as not to delay relevant construction certificates being able to be issued.
Clause 93 – Location and access to facilities and services – independent living units	Adequate transport facilities and services will be provided to residents. Further details will be provided as part of the formal EIS.
Clause 94 – Location and access to facilities and services – residential care facilities	Adequate transport facilities and services will be provided to residents. Further details will be provided as part of the formal EIS.



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TABLE 2: HOUSING SEPP PROVISIONS

Clause	Comment
Clause 95 – Water and sewer	The proposed development is considered capable of augmenting existing services to facilitate the operational functions of the Site once approved and constructed.
Clause 98 – Design of seniors housing	The proposed development has considered the Design Principles stipulated under Division 6, Clauses 99-105 of the Housing SEPP.
Clause 99 – Neighbourhood amenity and streetscape	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 100 – Visual and acoustic amenity	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 101 – Solar access and design for climate	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 102 – Stormwater	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 103 – Crime prevention	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 104 – Accessibility	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 105 – Waste management	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 106 – Interrelationship of Division with design principles in Division 6	The proposed development will satisfy the relevant provisions. Further details will be provided as part of the formal EIS.
Clause 107 – Non-discretionary development standards for hostels and residential care facilities – the Act, s 4.15	The proposed development will satisfy the non-discretionary development standards for residential care facilities where applicable.
Clause 108 – Non-discretionary development standards for independent living units – the Act, s 4.15	The proposed development will satisfy the non-discretionary development standards for independent living units where applicable.
Schedule 4 – Standards concerning accessibility and usability for hostels and independent living units	The proposed development will satisfy the standards concerning accessibility and usability for independent living units where applicable.

A detailed assessment against the Housing SEPP will be undertaken as part of the EIS demonstrating compliance with the relevant controls.

5.9 State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) aims to facilitate the effective delivery of infrastructure across NSW.

5.9.1 Development in or adjacent to rail corridors

Division 15, Subdivision 2 of the T&I SEPP has regard to development adjacent to rail corridors. The Site is adjacent to a rail corridor and as such will have regard for the following clauses:

- Clause 2.98 – Development adjacent to rail corridors;



- Clause 2.99 – Excavation in, above, below or adjacent to rail corridors; and
- Clause 2.100 – Impact of rail noise or vibration on non-rail development.

Consideration will be given to these Clauses within the forthcoming EIS.

5.9.2 Traffic generating development

Pursuant to Clause 2.122, certain developments are known as Traffic Generating Development and is to be referred to Transport for NSW (TfNSW). Schedule 3 of T&I SEPP lists the types of development that are defined as Traffic Generating Development. The referral thresholds for 'residential' development include sites of:

- *300 or more dwellings with access to a road (generally); or*
- *75 or more dwellings for a site with access to a classified road or to a road that connects to classified road.*

The proposal will trigger Traffic Generating Development, as it provides more than 75 dwellings and is located on a road connecting to a classified road. The forthcoming EIS will be supported by a robust transport and traffic impact assessment.

5.10 State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* (Resilience and Hazards SEPP) contains planning provisions relating to:

- land use planning within the coastal zone, in a manner consistent with the objects of the *Coastal Management Act 2016*.
- management of hazardous and offensive development.
- remediation of contaminated land and to minimise the risk of harm.

In relation to the Site, the following matters are highlighted.

5.10.1 Remediation of land

Under Chapter 4 of the Resilience and Hazards SEPP, where a DA is made, the consent authority must not grant consent unless:

- (a) *it has considered whether the land is contaminated, and*
- (b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

It is noted that remediation of the Site has previously been undertaken and appropriate documentation confirming as such will be provided as part of the SSDA.

5.11 Apartment Design Guide and Seniors Housing Design Guide

Chapter 4 of the Housing SEPP contains provisions for the design quality of residential apartment development, supported by the Apartment Design Guide (ADG). These provisions replaced the former SEPP 65, which has been repealed.



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The ADG applies to development for the purpose of a residential flat building, shop top housing or mixed-use development with a residential accommodation component comprising three (3) or more storeys. Seniors housing is also subject to the design principles and the Seniors Housing Design Guide under the Housing SEPP.

The proposed development would demonstrate consistency with the design quality principles and the relevant design criteria of the ADG and the Seniors Housing Design Guide, as applicable. Consultation has been undertaken with the State Design Review Panel (SDRP) and the proposed development would appropriately consider all comments received.

5.12 State Environmental Planning Policy (Sustainable Buildings) 2022

The *State Environmental Planning Policy (Sustainable Buildings) 2022* (Sustainable Buildings SEPP) encourages the design and delivery of more sustainable buildings across NSW. It sets sustainability standards for both residential and non-residential development and contributes to NSW's target of achieving net zero by 2050.

Chapter 2 – Standards for residential development - BASIX

Consideration will be given to this Chapter within the forthcoming EIS.

5.13 Ku-ring-gai Local Environmental Plan 2015

The Site is subject to the provisions of KLEP2015.

Zoning and Permissibility

The Site is zoned **R4 High Density Residential** pursuant to KLEP2015 (**Figure 3**). The objectives of the R4 zone within KLEP2015 are as follows:

- *To provide for the housing needs of the community within a high density residential environment.*
- *To provide a variety of housing types within a high density residential environment.*
- *To enable other land uses that provide facilities or services to meet the day to day needs of residents.*
- *To provide for high density residential housing close to public transport, services and employment opportunities.*

Seniors housing is currently a prohibited land use in the R4 High Density Residential zone under KLEP2015. Notwithstanding, the proposed development is permissible with consent pursuant to Clause 81 of the Housing SEPP, the Site being land to which Part 5 applies under Clause 79. As declared by the HDA, the proposed development would be accompanied by a concurrent PP that would amend KLEP2015 to add seniors housing as an additional permitted use on the Site and to increase the maximum building height applicable to the Site to 38m. The PP would not seek to alter the existing FSR, however would seek to obtain the bonus height and FSR afforded by the Housing SEPP.



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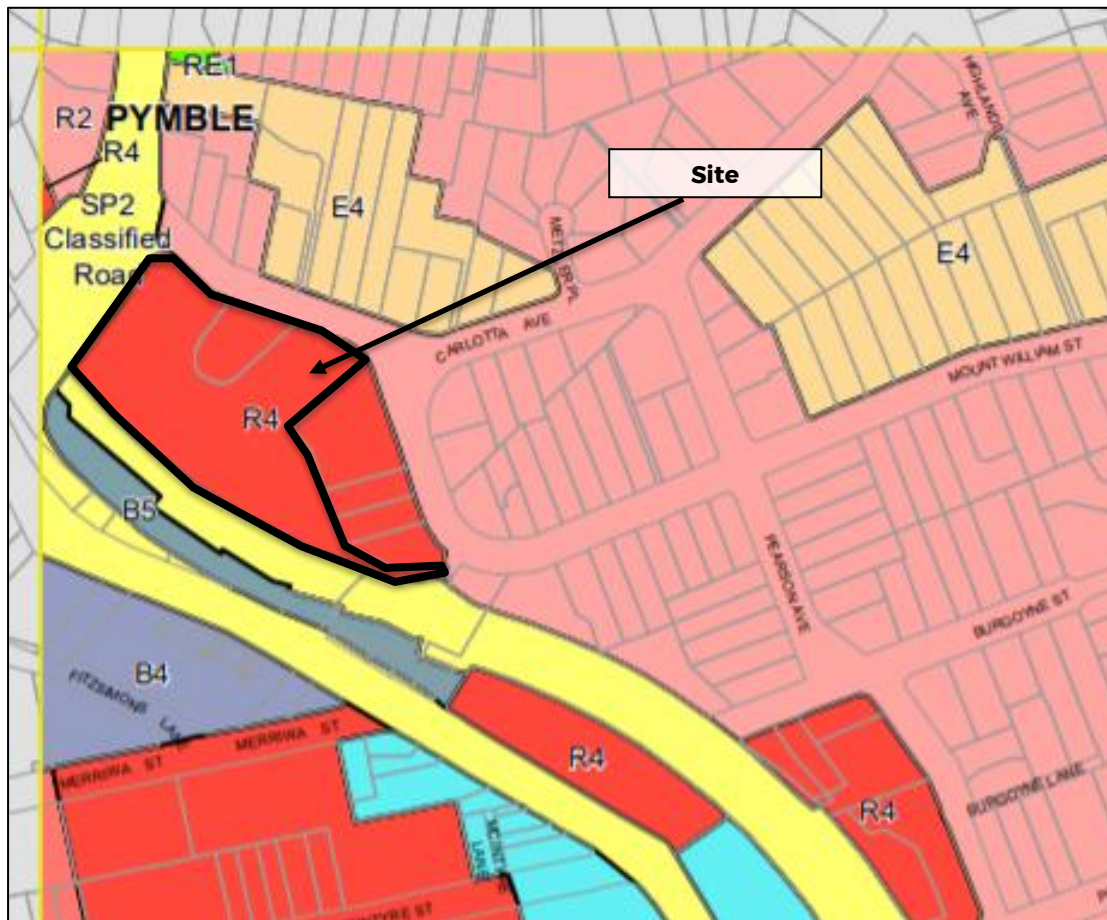


Figure 3. Zoning Map (Source: NSW Legislation, 2023)

Detailed assessment of all relevant development standards and provisions contained within KLEP2015 would be undertaken within the forthcoming EIS.

6.0 INDUSTRY-SPECIFIC SEARS

This section reviews the relevant industry-specific SEARs and includes commentary on how the Applicant intends to respond to each item, where applicable. Refer to **TABLE 3** for further details.

TABLE 3: INDUSTRY SPECIFIC SEARS		
Issue and Assessment Requirements	Documentation	Applicant Comments
1. Statutory Context	Address in EIS.	Noted - the proposal will address the requirement of this item.
2. Estimated Development Cost and Employment	EDC Report	Noted - an EDC Report would support the proposal.
3. Contributions and Public Benefit	Address in EIS.	No planning agreements are sought.
4. Engagement	Engagement Report	Noted - engagement will be carried out and will be detailed in the Engagement Report.
5. Design Quality	Address in EIS.	Design quality will be addressed in the EIS.

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TABLE 3: INDUSTRY SPECIFIC SEARS

Issue and Assessment Requirements	Documentation	Applicant Comments
	If required: ▪ Design Review Report (where the project has been reviewed by the SDRP). ▪ Design Excellence Strategy (where design excellence is required by an EPI). ▪ Competition Report (where a competitive design process has been held).	The proposal has undertaken the SDRP process where it has been reviewed two (2) times, however an additional SDRP meeting will be undertaken.
6. Built Form and Urban Design	Architectural drawings. Design Report. Survey Plan. BCA Compliance Report. Accessibility Report.	Noted - the proposal will address the requirements of this item through the listed reports.
7. Environmental Amenity	Shadow Diagrams. View Analysis. Pedestrian Wind Environment Assessment. If required: Design Verification Statement Housing SEPP (ADG) Assessment	Noted - the proposal will address the requirements of this item through the listed reports.
8. Visual Impact	Visual Analysis. Visual Impact Assessment.	Noted - the proposal will be informed by photomontages and perspective drawings, where necessary, and include a Visual Impact Assessment.
9. Transport	Transport Impact Assessment Preliminary Construction Traffic (or Transport) Management Plan	Noted - the proposal will address the requirements of this item through the listed reports.
10. Noise and Vibration	Noise and Vibration Impact Assessment.	Noted - the proposal will be supported by a Noise and Vibration Impact Assessment.
11. Water Management	Integrated Water Management Plan.	Noted - the proposal will be supported by an Integrated Water Management Plan.
12. Ground and Water Conditions	Geotechnical Assessment. Surface and Groundwater Impact Assessment. Salinity Management Plan Acid Sulfate Soils Management Plan.	Noted - the proposal will address the requirements of this item through the listed reports.
13. Contamination and Remediation	Preliminary Site Investigation. Detailed Site Investigation. Remedial Action Plan.	Noted - the proposal will be supported by the relevant contamination documentation.



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TABLE 3: INDUSTRY SPECIFIC SEARS

Issue and Assessment Requirements	Documentation	Applicant Comments
	Preliminary Long-term Environmental Management Plan.	
14. Trees and Landscaping	Arboricultural Impact Assessment.	Noted – the proposed will provide an Arboricultural Impact Assessment.
15. Ecologically Sustainable Development (ESD)	ESD Report.	Noted – the proposal will provide an ESD report.
16. Biodiversity	Biodiversity Development Assessment Report or BDAR Waiver.	Noted – the proposal will provide a BDAR.
17. Waste Management	Waste Management Plan. Hazardous Material Survey.	Noted – the proposal will be supported by a Waste Management Plan. There is no demolition proposed as part of this application.
18. Social Impact	Social Impact Assessment.	Noted – the proposal will be supported by a Social Impact Assessment.
19. Flood Risk	Flood Risk Assessment.	Noted – the proposed development is not located on flood prone land, however any flooding or overland flow impacts will be considered as necessary.
20. Bush Fire Risk	Bush Fire Assessment.	The proposal is not located on bushfire prone land.
21. Aboriginal Cultural Heritage	Aboriginal Cultural Heritage Assessment Report.	Noted – the proposal will be supported by an Aboriginal Cultural Heritage Assessment Report.
22. Environmental Heritage	Statement of Heritage Impact. Archaeological Assessment.	Noted. There is no heritage within proximity to the Site. The proposal will be supported by an Archaeological Assessment if required.
23. Public Space	Public Space Plan	N/A – no public space is proposed.
24. Hazards and Risk	Preliminary Hazard Analysis.	Noted – the proposal will be supported, if required, by a Preliminary Hazard Analysis.

7.0 CONCLUSION

The proposed development comprises a RAC and ILUs, including a component of affordable housing, and has been declared to be SSD pursuant to Clause 4(1)(n) of the SSD Order No.4 2026. As declared by the HDA, the proposed development would also be accompanied by a concurrent PP to increase the maximum building height and to add seniors housing as an additional permitted use at the Site under KLEP2015.

The Site is situated within the Ku-ring-gai LGA and is complemented by surrounding developments of similar contextual importance; therefore, the Site is considered highly suitable for the proposed development, given the provision for aged care services and employment-related uses.



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The proposed development is considered to align with the strategic objectives of the Housing SEPP and KLEP2015 and will support the aged care sector through provision of enhanced aged care services and employment-generating opportunities within the wider Sydney Metropolitan Region. Furthermore, the Site is located within close proximity to housing and key infrastructure. In this respect, the proposed development would provide for economic growth and prosperity for the Ku-ring-gai LGA.

Additionally, as noted throughout this request, the proposed development would be carried out in an environmentally and ecologically sustainable manner and would further implement suitable mitigation measures to ensure that the amenity and function of surrounding land uses would not be compromised.

It is requested that NSW DPHI issue formal industry-specific SEARs for the preparation of an EIS for the proposed development as SSD, together with the documentation required for the concurrent PP.

Should you require any further information to do so, please do not hesitate to contact the undersigned.

Yours sincerely,



Chris Wilson
Managing Director
Willowtree Planning Pty Ltd

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Appendix 1	Preliminary Architectural Plans
Appendix 2	Cost Plan

