



PACIFIC PLANNING

**Pacific Planning**

Property | Planning | Project Management

T 9522 6575

E [info@pacificplanning.com.au](mailto:info@pacificplanning.com.au)

ABN 88 610 562 760

**Preliminary scoping report**  
**State significant development**  
**Seniors housing and residential aged care**  
**550 New South Head Road, Point Piper, NSW 2027**



**Submitted to Department of Planning, Housing and Infrastructure**

**August 2025**

## Table of contents

1	Executive summary.....	1-1
2	Introduction.....	2-1
2.1	Purpose.....	2-1
2.2	Subject site.....	2-2
3	Social need and justification .....	3-2
3.1	Demographic trends .....	3-3
3.2	Current supply and service gaps.....	3-3
3.3	Health and chronic disease profile .....	3-3
3.4	Strategic alignment.....	3-3
3.5	Benefits of the Elaine precinct.....	3-4
3.6	Conclusion – social needs and justification .....	3-4
4	Project proposal .....	4-4
4.1	Overview .....	4-4
4.2	Site area and yield.....	4-5
4.3	Design approach.....	4-5
4.4	Economic and community contribution.....	4-5
5	Site and context.....	5-5
5.1	Location and setting .....	5-5
5.2	Site area and subdivision .....	5-6
5.3	Heritage context .....	5-6
5.4	Surrounding environment.....	5-7
5.5	Access and connectivity .....	5-8
6	Planning framework .....	6-8
6.1	Why the project is SSD under the Planning System SEPP 2021 .....	6-8
6.2	Other relevant planning controls .....	6-11
6.3	Compliance position.....	6-11
7	Design principles and criteria .....	7-12
7.1	Integrated and multi-disciplinary design approach.....	7-12
7.2	Indicative massing .....	7-13
7.3	Guiding design approach .....	7-15
7.4	Apartment Design Guide (ADG) and Housing SEPP benchmarks.....	7-15
7.5	Heritage and landscape integration .....	7-16
7.6	Amenity and wellbeing .....	7-16
8	Engagement methodology.....	8-16

8.1	Context and history.....	8-16
8.2	Principles of engagement.....	8-17
8.3	Stakeholders .....	8-17
8.4	Timing and staging .....	8-18
8.5	Role of the conservation management plan .....	8-18
8.5.1	Benefits of this approach.....	8-18
9	8. Indicative timing and next steps.....	9-18
9.1	Program for lodgement .....	9-18
9.2	Engagement milestones.....	9-18
9.3	Key technical investigations .....	9-19
9.4	Next steps .....	9-19
10	Conclusion.....	10-19
11	Appendix A - Preliminary Healthcare Development Assessment – Integrated Seniors Living and Healthcare Precinct for Elaine .....	11-20

## List of figures

Figure 1	site location.....	2-2
Figure 2	Site location and local context .....	5-7
Figure 3	zoning 2014 Woollahra LEP .....	6-11
Figure 4	Heritage local and state items mapping.....	6-12
Figure 5	Massing option with “Elaine” retained .....	7-13
Figure 6	Massing section “Elaine” retained .....	7-14
Figure 7	Massing option with “Elaine” removed .....	7-14
Figure 8	Massing section “Elaine” removed .....	7-15

## List of tables

Table 1	Land use controls analysis .....	6-9
---------	----------------------------------	-----

## Appendices

<b>Appendix A</b>	Arrow Advisory - Preliminary Healthcare Development Assessment: Integrated Seniors Living and Healthcare Precinct for Elaine
<b>Appendix B</b>	Tzannes and Associates – Site Plan and existing approved development footprint

## Contact

This report has been prepared on behalf of 550 NSHR Pty Ltd by:

Matthew Daniel, MPM, MBA (major PM) Grad Cert (Urban Planning).

James Matthews, BSc (City and Regional Planning) Dip. (Town Planning)

### Pacific Planning Pty Ltd

Level G, 16 Leavesden Place

Sylvania

NSW 2224

M 0404 007 700, 0437 521 110

E: mdaniel@pacificplanning.com.au

E jmatthews@pacificplanning.com.au

ABN: 88 610 562 760

This report has been prepared by:



### Document Control

Version	Date	Prepared	Reviewed
v.1.0	29 August 2025	Matthew Daniel	James Matthews

All Rights Reserved. No material may be reproduced without prior permission from Pacific Planning Pty Ltd. Pacific Planning Pty Ltd while working on this project, has tried to ensure the accuracy of the information in this publication, it accepts no responsibility or liability for any errors, omissions or resultant consequences including any loss or damage arising from reliance in the information in this publication.

## Project team – specialist advisors

Discipline / Expertise	Consultant / Organisation	Role in project
Architecture and urban design	Tzannes	Lead architectural design and urban design framework
Landscape and Connecting with Country	Yerrabingin	Landscape architecture and integration of Connecting with Country principles
Heritage	Weir Phillips	Heritage advice, Conservation Management Plan and heritage impact assessment
Traffic and access	Erica Marshall	Traffic, parking and access assessment
Urban planning	Pacific Planning	Town planning, statutory pathway, SSD preparation
Economics and sustainability / social impacts	Pacific Economics & Sustainability	Economic analysis, sustainability testing and social impact assessment
Seniors housing and healthcare	Arrow Advisory	Healthcare planning, aged care and ILU demand analysis, social needs assessment
Engagement	Forward Thinking	Community and stakeholder engagement strategy
Legal and planning law	Addisons lawyers	Legal advisory and planning law.

## 1 Executive summary

This preliminary scoping report has been prepared to support a request for the issue of Secretary's Environmental Assessment Requirements (SEARs) for a State significant development (SSD) application at 550 New South Head Road, Point Piper. The proposal is made under clause 26A of the Planning System SEPP 2021 for seniors housing development.

The project will deliver an integrated seniors living and healthcare precinct that combines independent living units (ILUs), a residential aged care facility (RAC), and ancillary health and wellbeing services. The concept includes within a land use and controls compliant scheme:

- Approximately 30 ILUs designed to support downsizing within the local community.
- A RAC facility of 40 beds configured in a small household model, including dementia-friendly design.
- An on-site health and wellness hub with a general practice, allied health suites, rehabilitation facilities and community amenities.
- Retention of significant heritage trees and integration of landscaped gardens that connect with the foreshore character of Double Bay.

The Elaine site has a complex planning history and is locally heritage listed under the Woollahra LEP 2014. It presents an opportunity to deliver a high-quality outcome that respects the heritage context while addressing pressing social and housing needs. The SSD pathway offers the appropriate framework to consolidate previous fragmented processes and progress the project through a coordinated assessment informed by a conservation management plan.

The proposal is supported by demographic and health evidence demonstrating a significant shortfall of age-appropriate housing and care within the Woollahra and eastern suburbs catchment. Analysis by Arrow Advisory (August 2025) confirms rising demand for both ILUs and RAC beds, an ageing population profile, and a chronic disease burden that requires new models of integrated care.

This report sets out the site context, planning framework, preliminary compliance position, design principles, engagement methodology, and social need. It demonstrates that the project is permissible, consistent with Housing SEPP objectives, and capable of achieving compliance with relevant non-discretionary standards.

The proponent seeks the department's issue of industry SEARs to enable a considered and respectful engagement program to support the preparation of an environmental impact statement (EIS) and progression of the project to determination.

## 2 Introduction

### 2.1 Purpose

This preliminary scoping report provides an overview of the proposed development at 550 New South Head Road, Point Piper, for the purpose independent living units and residential care facilities (seniors housing) under the provisions of the Housing SEPP 2021, and supports a request for industry specific SEARs.

The site is zoned R3 Medium Density Residential under the Woollahra LEP 2014, under which development for the purpose of seniors housing is wholly permissible. The development site is



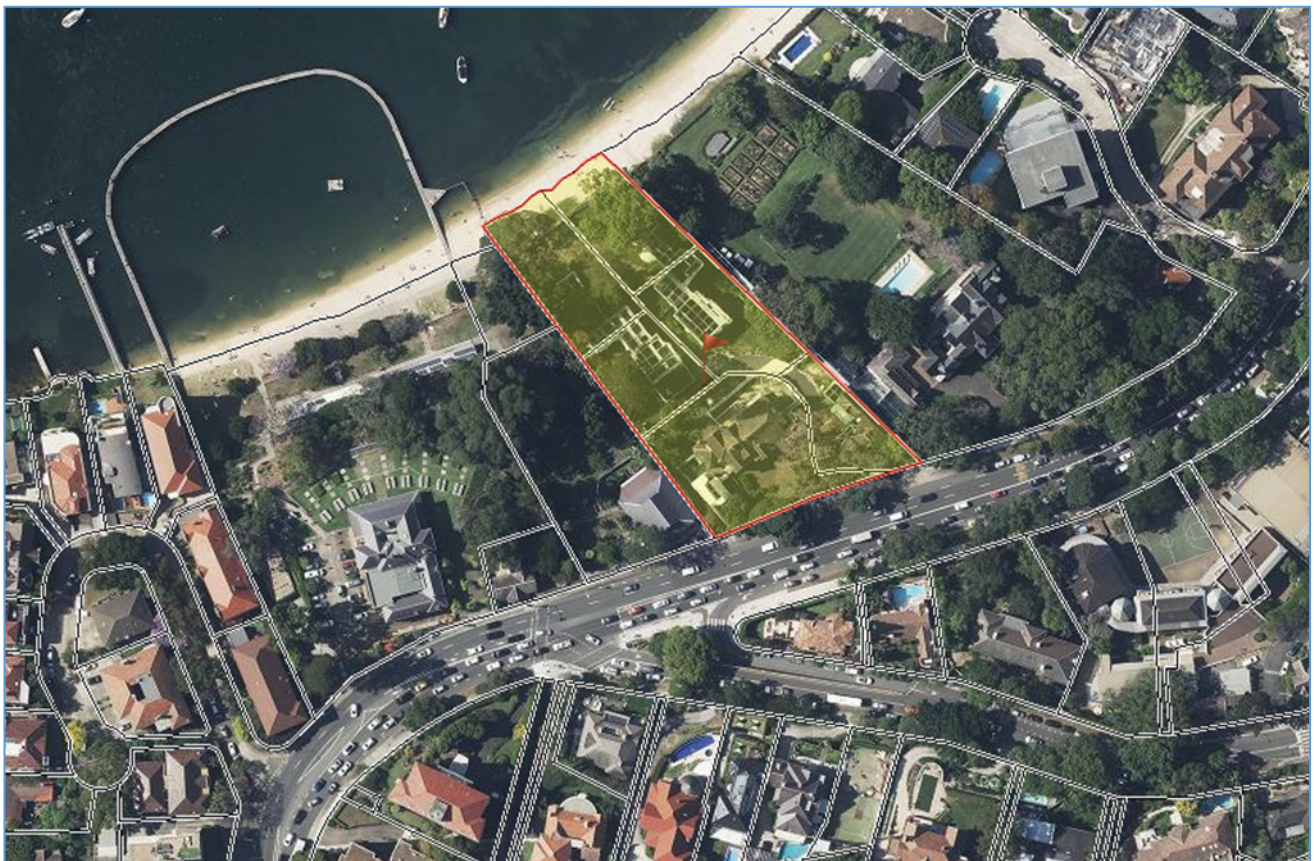
locally heritage listed under the Schedule 5 of the Woollahra LEP 2014 as follows: “Elaine”—house, grounds and interiors, Cook Pine, Norfolk Island Pine, Bunya Pine, Camphor Laurel, Port Jackson Fig, Seven Shillings Beach.

This report supports a request for a scoping meeting and has been prepared in accordance with the requirements and minimum information of the department’s *Guide to Faster Assessments for SSD Housing Applications*.

The report is supported by a location plan, site plan, approved development on the site and conceptual massing and sections. The conceptual massing and sections consider the development outcome with and without “Elaine” which will be subject to further assessment of significance and testing through the SSD process.

## 2.2 Subject site

The subject site is located at 550 New South Head Road, Point Piper.



**Figure 1 site location**

## 3 Social need and justification

A detailed healthcare and demographic assessment has been prepared by Arrow Advisory (August 2025) to support the proposal. The report confirms the strong and growing need for residential aged care beds, independent living units and ancillary health services within the Woollahra and eastern suburbs catchment. It highlights the ageing population, chronic disease burden, current service shortfalls, and the benefits of delivering an integrated health and seniors living precinct at Elaine. A summary of the report is provided at Appendix A, with the full Arrow Advisory report included in the appendices.

### 3.1 Demographic trends

Australia's population is ageing rapidly. By 2066, people aged 65 and over are projected to comprise up to 23% of the population, compared with 16% in 2020. The cohort aged 85+ is the fastest growing, forecast to rise from 2.1% in 2020 to up to 4.4% by 2066.

Woollahra LGA already has one of Sydney's oldest populations:

- 20.9% of residents are aged 65+ (2021 Census).
- 3.2% of residents are aged 85+, well above the metropolitan average.

Within the broader SA3 catchment (Bellevue Hill, Double Bay, Darling Point, Vaucluse, Watsons Bay and surrounds), more than 21,000 people aged 65+ reside in 2024, rising to over 25,000 by 2035.

These trends foreshadow significant growth in demand for both independent living options and residential aged care facilities (RACF).

### 3.2 Current supply and service gaps

- The catchment contains just five significant retirement villages, the largest being Goodwin Village with 158 dwellings.
- Residential aged care is fragmented across 14 facilities, with only 1,027 beds in total — many of which are outdated, small-scale, or institutional in character.
- Demand projections show a shortfall of more than 400 beds by 2034, with practical demand likely higher.
- Few facilities integrate health and wellness services on-site, requiring older residents to travel to Bondi Junction or beyond for care.

As a result, many long-term residents of Woollahra and Point Piper have no local aged care pathway and must relocate away from family and community ties when care needs change.

### 3.3 Health and chronic disease profile

- 80% of Australians aged 65+ have at least one chronic health condition, and 28% live with three or more.
- Nearly half (49%) report arthritis, while one in five live with chronic pain.
- Cardiovascular disease affects an estimated 717,800 people aged 65+.
- Prevalence of dementia and cognitive decline increases steeply with age, creating the need for dementia-friendly design and memory support programs.

This burden of chronic disease underscores the need for integrated health and aged care models that combine residential, clinical, and community services.

### 3.4 Strategic alignment

The proposal aligns with key State and national policy objectives:

- **NSW Housing Accord:** diversifying housing supply and delivering seniors housing in established communities.

- **Future Directions for Aged Care in NSW:** encouraging integrated models of care and ageing in place.
- **EP&A Act Section 1.3:** promoting social welfare and housing choice as part of ecologically sustainable development.
- **NSW Health policy directions:** reducing pressure on hospitals through expanded community-based care and rehabilitation.

### 3.5 Benefits of the Elaine precinct

The development at Elaine will:

- Provide ILUs and RAC beds in a high-need location.
- Deliver an on-site GP clinic, allied health suites, and rehabilitation facilities, improving access for both residents and the wider community.
- Enable ageing in place, with seamless transitions from ILU to RAC without relocation.
- Offer dementia-friendly design and wellness programs that reduce avoidable hospital admissions.
- Free up existing housing stock by allowing older households to downsize locally.
- Create employment in aged care, health, hospitality and training, strengthening the care workforce.
- Build on local benchmarks (e.g. Mark Moran Vaucluse) while exceeding them through integration of multidisciplinary health services.

### 3.6 Conclusion – social needs and justification

There is a clear and compelling social need for new seniors housing in Woollahra. Demographic trends and current service gaps show that existing provision is inadequate to meet future demand. By combining ILUs, RAC and health services, the Elaine project directly responds to this need, ensuring that older residents can remain within their community while accessing high-quality care and housing.

## 4 Project proposal

The Elaine site will be redeveloped as an integrated seniors living and healthcare precinct. The proposal will deliver a mix of independent living units (ILUs), a residential aged care facility (RAC), and ancillary health and wellbeing facilities to meet the needs of Woollahra's ageing population.

### 4.1 Overview

The development will comprise:

- **Independent Living Units (ILUs):** Premium retirement apartments, generally 120–150 m<sup>2</sup>, designed for older residents wishing to downsize while remaining in their community.
- **Residential Aged Care (RAC):** Approximately 40 beds configured in small household models (10–15 residents per household), dementia-friendly design, and integrated wellness spaces.



- **Ancillary health and wellbeing hub:** Including a general practice, allied health suites, rehabilitation gym, hydrotherapy pool, and dementia care programs.
- **Community amenities:** Hospitality and lifestyle facilities (café, library, art studio, gardens, multipurpose rooms) accessible to both residents and the wider community.

## 4.2 Site area and yield

Total site area: **6,894.9 m<sup>2</sup>** and a proposed gross floor area of **5,584.9 m<sup>2</sup>**

Indicative yield:

- 30 ILUs
- 40 RAC beds
- 1,500–2,000 m<sup>2</sup> ancillary health and wellbeing space
- Communal open space and landscaped areas

Final yield to be determined through built form testing and detailed design during the EIS process.

## 4.3 Design approach

Development will be guided by principles of universal design, wellness and integrated care.

Two indicative massing scenarios have been prepared:

**Scenario A:** Retention of the heritage house known as “Elaine”.

**Scenario B:** Removal of “Elaine”, subject to assessment of heritage significance.

Both scenarios comply with the maximum height (14.3 m under Housing SEPP) and FSR (0.81:1 with Housing SEPP provisions).

Landscape design will integrate heritage-listed trees (Cook Pine, Norfolk Island Pine, Bunya Pine, Camphor Laurel, Port Jackson Fig) and create new communal gardens.

## 4.4 Economic and community contribution

- Delivery of high-quality seniors housing and health services in a location with significant unmet need.
- Employment generation across aged care, health, hospitality and support services.
- Activation of community spaces for health education, intergenerational programs and wellbeing activities.

# 5 Site and context

## 5.1 Location and setting

The subject site is located at 550 New South Head Road, Point Piper, on the northern side of New South Head Road fronting Double Bay. The land is bounded by:

- **North:** Blackburn Cove and Seven Shillings Beach.
- **East:** “Fairwater”, a State-significant harbourside estate.

- **South:** New South Head Road, a major arterial road.
- **West:** Woollahra Library, Blackburn Gardens and Murray Rose Pool (Redleaf Pool).

The site occupies a prominent foreshore position, forming part of the prestigious Point Piper peninsula.

## 5.2 Site area and subdivision

The site area is approximately 6,894.9 m<sup>2</sup>. The land was subdivided in 1996 into six lots, comprising:

- **Lot 5:** The main house “Elaine”, a large, altered residence associated with the Fairfax family.
- **Lot 6:** Former servants’ quarters above a garage.
- **Lots 1–4:** Vacant grounds, gardens and tennis court extending to the foreshore.

All six lots remain in single ownership and are the subject of the current proposal.

## 5.3 Heritage context

The site is listed as a local heritage item under Schedule 5 of the Woollahra LEP 2014:

*“Elaine – house, grounds and interiors, Cook Pine, Norfolk Island Pine, Bunya Pine, Camphor Laurel, Port Jackson Fig, Seven Shillings Beach.”*

Key considerations include:

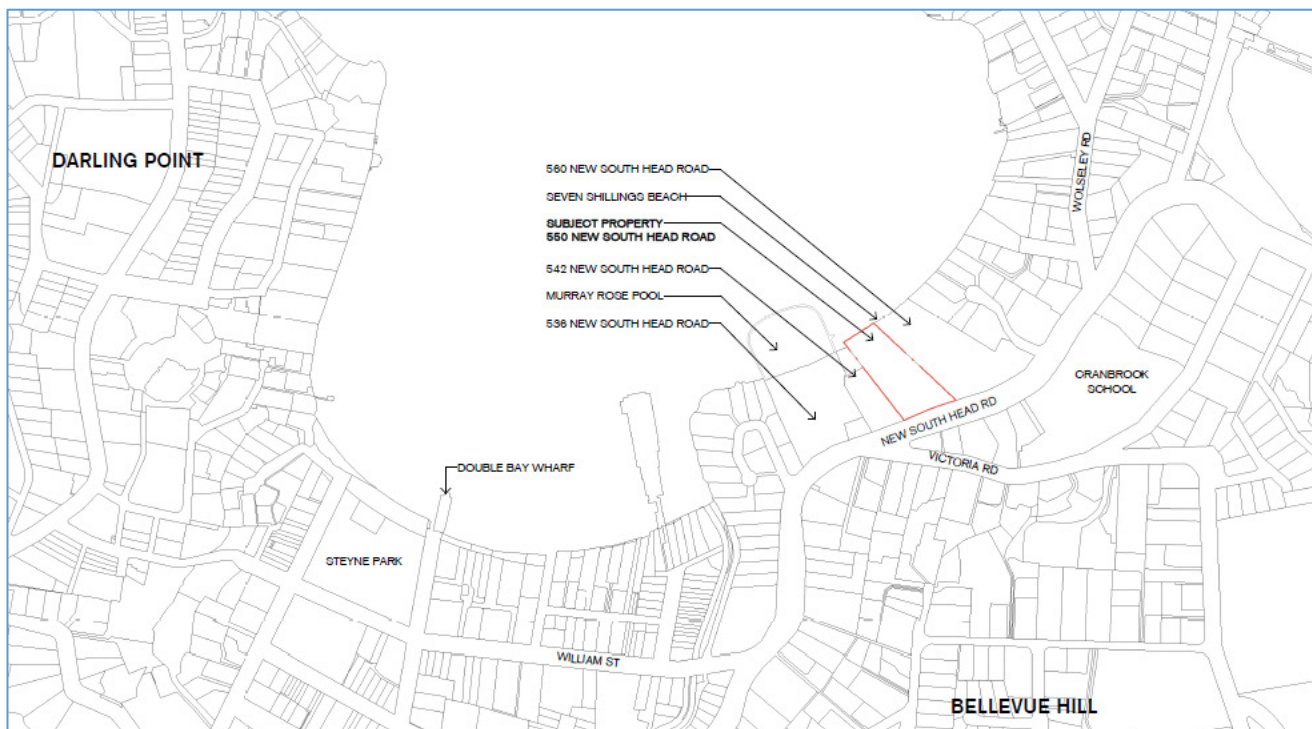
- **House “Elaine”:** Significance reduced by successive 20th-century alterations; assessed as local, not State, significance (Paul Davies 2014; TKD CMP 2015).
- **Grounds:** Modified extensively during the 20th century; original garden character altered, but open setting remains important.
- **Significant trees:** Five mature trees are individually listed and will be retained.
- **Foreshore wall and paths:** Elements of interest but not considered highly significant in CMP assessments.

The adjacent properties “Fairwater” and Blackburn Gardens are also heritage-listed and form part of the broader cultural landscape of Double Bay.

The site is listed as a local heritage item in the Woollahra LEP 2014. The listing extends to the house “Elaine”, its grounds, and a number of individually significant trees including the Cook Pine, Norfolk Island Pine, Bunya Pine, Camphor Laurel and Port Jackson Fig. These mature trees are widely recognised as the most important contributors to the cultural landscape, forming part of a broader planting theme that links Blackburn Gardens, Fairwater and other harbour estates along New South Head Road. As noted by Tanner Kibble Denton Architects in their Statement of Heritage Impact (2015), *“the grouping of the three Araucarias along the western boundary to Blackburn Gardens are a spectacular visual massing... [and] the very tall column-like form of the Cook Pine is a very important element in this landscape and acts as a major highlight and feature within the overall Araucaria massing on these properties.”* The Camphor Laurel and Port Jackson Fig adjoining the foreshore are also described as creating *“a tremendous sense of scale and a cathedral effect over this visually important foreshore area.”* These landscape elements provide the enduring heritage values of the site and represent the main opportunity for the project to connect sensitively with the

foreshore and broader harbour setting. They will be retained and enhanced as part of the proposed development.

By contrast, the house itself has been subject to extensive alterations, particularly in the mid-twentieth century, and no longer demonstrates the architectural integrity of other Fairfax family houses or comparable harbour residences of the late nineteenth and early twentieth centuries. As TKD concluded, “*Elaine... lacks the integrity and architectural quality of other significant houses owned by the Fairfax family and significant nineteenth and early twentieth century houses that were owned by prominent and influential families.*” While some early twentieth-century spaces and fabric remain, particularly in the western portion of the house, much of the building is a composite of later works. In addition, it is noted that the Aboriginal cultural significance of the land has not been specifically investigated to date. This will form part of the SSD process, ensuring that Aboriginal values and connections to Country are respected and integrated into the CMP and detailed design. The preparation of a new CMP and updated heritage impact assessments will therefore consider both the built and landscape heritage, alongside Aboriginal cultural values, to ensure the project achieves an outcome that is culturally respectful, environmentally responsive and socially beneficial.



**Figure 2 Site location and local context**

## 5.4 Surrounding environment

The site sits within a heritage-rich, landscaped foreshore precinct comprising large estates, public gardens, and civic uses:

- **Blackburn Gardens (west):** Council-managed gardens leading to Murray Rose Pool; significant public open space.
- **Fairwater (east):** Large, privately-owned harbourside estate with State heritage listing.

- **Redleaf Pool and Woollahra Library (west/south):** Community facilities and landmarks of local significance.
- **Point Piper precinct:** Predominantly high-value residential land, with a mix of interwar flats, post-war apartments, and harbourside dwellings.

## 5.5 Access and connectivity

- Vehicular access is currently via a right-of-carriageway over Lot 6 from New South Head Road.
- The frontage to New South Head Road is approximately 70 metres.
- The site is located within an accessible area under the Housing SEPP, with proximity to bus services along New South Head Road and connection to Edgecliff Interchange.

## 6 Planning framework

This project seeks to progress a scheme that is both compliant with the applicable land use controls and responsive to the broader needs of the State for the delivery of seniors housing and residential aged care facilities. The proposal will be assessed within the established statutory framework, with the Housing SEPP 2021 and Woollahra LEP 2014 providing the key planning controls. The intent is to achieve a development outcome that satisfies the technical requirements while also contributing to the State's strategic priorities for housing diversity, ageing in place, and integrated models of care.

### 6.1 Why the project is SSD under the Planning System SEPP 2021

The project is classified as state significant development (SSD) under the Planning System SEPP 2021 because it satisfies the requirements of clause 26A. Clause 26A specifies that development is SSD if it is:

1. Development for the purposes of seniors housing under Part 5 of the Housing SEPP 2021 that includes a residential aged care facility , and
2. Development that is of a estimated development cost of more than \$30 million, or is otherwise declared SSD due to its scale and significance.

The Elaine proposal meets these tests because:

- It is expressly for the purpose of seniors housing, comprising a combination of independent living units (ILUs) and a residential aged care facility (RACF), with ancillary health and wellbeing services.
- The provision of approximately 5,900 m<sup>2</sup> of gross floor area of development that will accommodate approximately 30 ILUs 40 residential aged care beds and related health infrastructure exceeds the estimated development cost of the \$30 million SSD threshold.
- The proposal delivers a land use outcome of State and regional importance by addressing a significant shortfall in aged care and seniors housing supply within metropolitan Sydney, particularly in the eastern suburbs.

Accordingly, the project falls within the SSD provisions of the Planning System SEPP 2021 and requires the preparation of an environmental impact statement (EIS) following the issue of SEARs by the department.



**Table 1 Land use controls analysis**

Description	
Summary of Proposal	To develop the site for the purpose of independent living units and residential care facilities pursuant to the provisions of the Part 5 of the Housing SEPP. The yield will be determined by further built form testing and development.
Site Area	6894.9m <sup>2</sup>
Woollahra LEP 2014	
Site Zoning (Figure 3)	<p>R3 Medium Density Residential</p> <p>Permitted with consent:</p> <p><b>seniors housing</b> means a building or place that is—</p> <p>(a) a residential care facility, or</p> <p>(b) a hostel within the meaning of State Environmental Planning Policy (Housing) 2021, Chapter 3, Part 5, or</p> <p>(c) a group of independent living units, or</p> <p>(d) a combination of any of the buildings or places referred to in paragraphs (a)–(c),</p> <p>and that is, or is intended to be, used permanently for—</p> <p>(e) seniors or people who have a disability, or</p> <p>(f) people who live in the same household with seniors or people who have a disability, or</p> <p>(g) staff employed to assist in the administration of the building or place or in the provision of services to persons living in the building or place,</p> <p>but does not include a hospital.</p>
Woollahra LEP 2014 Maximum Height	10.5 metres
Woollahra LEP 2014 Maximum FSR	0.65:1
Heritage listing (Figure 4)	“Elaine”—house, grounds and interiors, Cook Pine, Norfolk Island Pine, Bunya Pine, Camphor Laurel, Port Jackson Fig, Seven Shillings Beach.
<p><b>Part 5 Housing for seniors and people with a disability Housing SEPP 2021</b></p> <p>The below outlines key criteria relevant to the proposal under the Housing SEPP. A statutory Compliance Table that addresses all criteria under the SEPP will be included with the EIS.</p>	

79	Land to which Part applies	(d) Zone R3 Medium Density Residential,
	Division 3 Development Standards	(2) Development consent must not be granted for development to which this section applies unless—
	(a) the site area of the development is at least 1,000m <sup>2</sup> , and	The site is 6894.9 m <sup>2</sup>
	(b) the frontage of the site area of the development is at least 20 m measured at the building line, and	The frontage is approximately 70 metres
	(c) for development on land in a residential zone where residential flat buildings are not permitted—	Residential flat buildings are permitted in the R3 Medium Density Residential zone
87	Additional floor space ratios	0.65:1 plus 25%
	(2) Development consent may be granted for development to which this section applies if—	Maximum permissible FSR under the Housing SEPP = 0.81:1 or 5584.9 m <sup>2</sup>
	(b) the development will result in a building with the maximum permissible floor space ratio plus—	
	(iii) for development involving independent living units and residential care facilities—an additional 25% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units or a residential care facility, or both, and	
	(c) the development will result in a building with a height of not more than 3.8m above the maximum permissible building height.	10.5 metres plus 3.8 metres  Maximum permissible height under the Housing SEPP = 14.3 metres



**Figure 3 zoning 2014 Woollahra LEP**

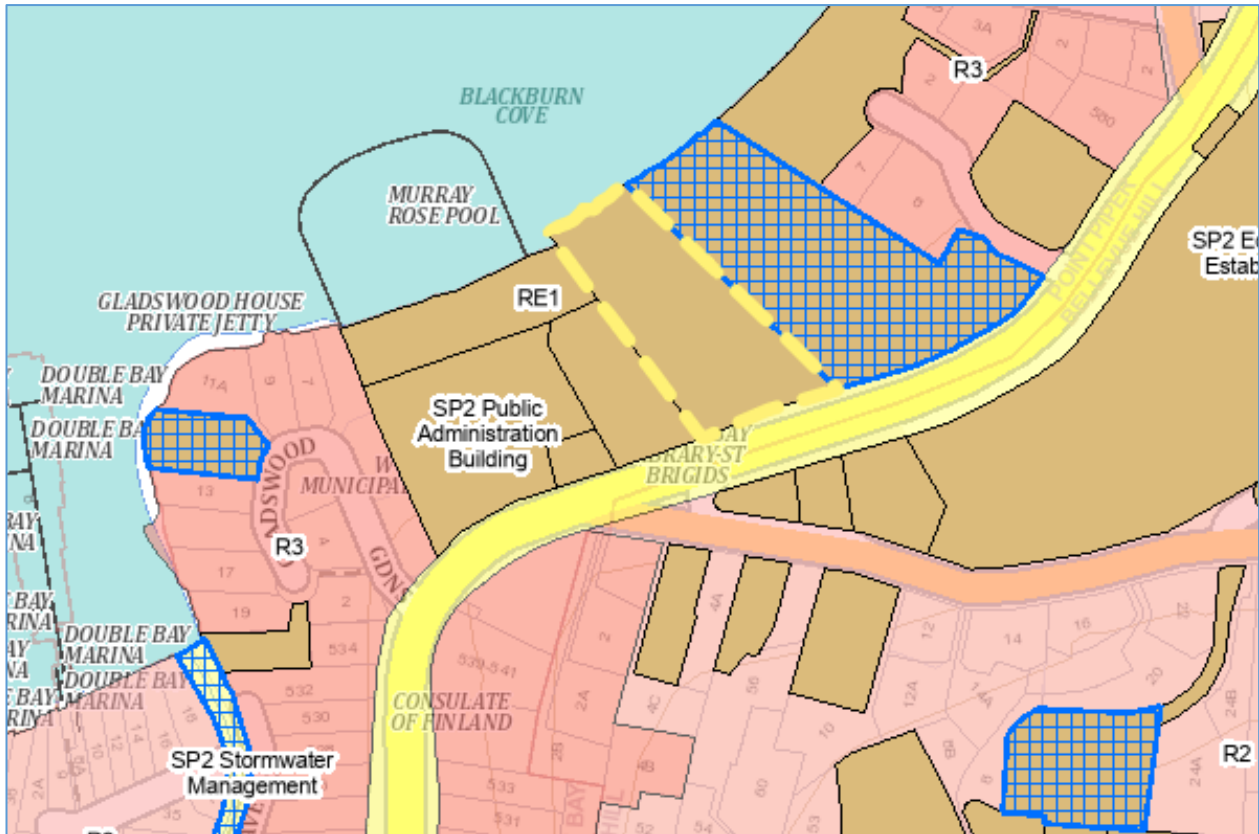
## 6.2 Other relevant planning controls

- **Foreshore building line:** LEP provisions will be tested in detailed design; proposal will respect setbacks and landscape character.
- **Scenic protection:** Site is within the Sydney Harbour Catchment; assessment of visual impact and view sharing will be included in the EIS.
- **Heritage:** Site is a local heritage item (Elaine, grounds, trees); heritage assessment and CMP review will be undertaken through the SSD process.
- **Development Control Plans:** Woollahra DCP 2015 and Sydney Harbour Foreshore & Waterways DCP will be addressed for contextual consistency.

## 6.3 Compliance position

At a high level:

- The site comfortably exceeds site area and frontage standards.
- Indicative designs are able to achieve compliance with height and FSR limits under the Housing SEPP.
- Any minor variations will be transparently addressed in the EIS.
- Heritage considerations will be resolved through structured CMP development and agency engagement post-SEARs.



**Figure 4** *Heritage local and state items mapping*

## 7 Design principles and criteria

### 7.1 Integrated and multi-disciplinary design approach

The project will be advanced through a multi-disciplinary design framework that brings together:

- **Architectural and urban design** – to establish a built form that is responsive to site conditions, provides high-quality living environments and minimises visual and heritage impacts.
- **Landscape architecture** – to shape the foreshore and garden setting, ensuring retention of significant trees, provision of deep soil zones and new communal open spaces that connect with the broader landscape character of Blackburn Gardens and Fairwater.
- **Heritage expertise** – to guide conservation outcomes and integrate the heritage values of Elaine and its grounds into the design response, ensuring that the development respects its cultural context.
- **Connecting with Country** – to embed Aboriginal cultural values and Country-led design principles into the landscape and architectural framework, fostering deeper respect for place and its layered histories.
- **Health and social planning input** – to ensure that the built form supports the integrated care model, with seamless connections between ILUs, RAC, and ancillary health and wellness facilities.

This combined approach will culminate in the preparation of a conservation management plan (CMP) that will guide detailed design. The CMP will not only address statutory heritage values but will



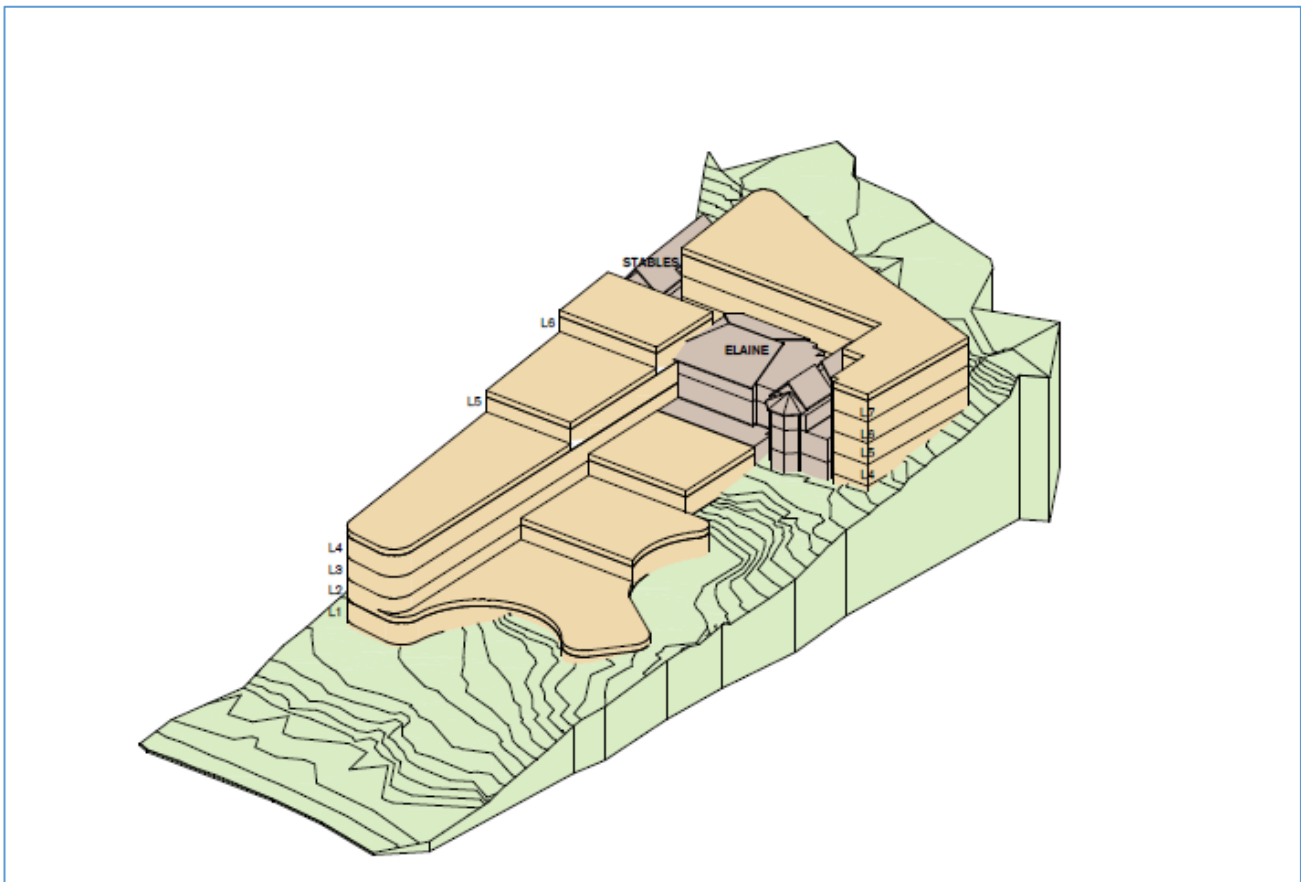
also shape the design framework to ensure the project delivers on its social need objectives: ageing in place, integration of health services, and provision of inclusive, high-quality housing for older Australians.

## 7.2 Indicative massing

The indicative massing has studied two potential scenarios that include the retention of the house known as “Elaine”, and another with its removal.

The assessment process will seek to study and investigate the heritage significance and values associated with the broader site, including the grounds and vegetation, and that will inform the detailed design and built form testing.

The maximum height of 14.3 metres will be complied with, in addition to the maximum density control of 0.81:1. The number of independent living units will be informed by the next stage of design and compliance with the requirements of the Housing SEPP.



**Figure 5 Massing option with “Elaine” retained**

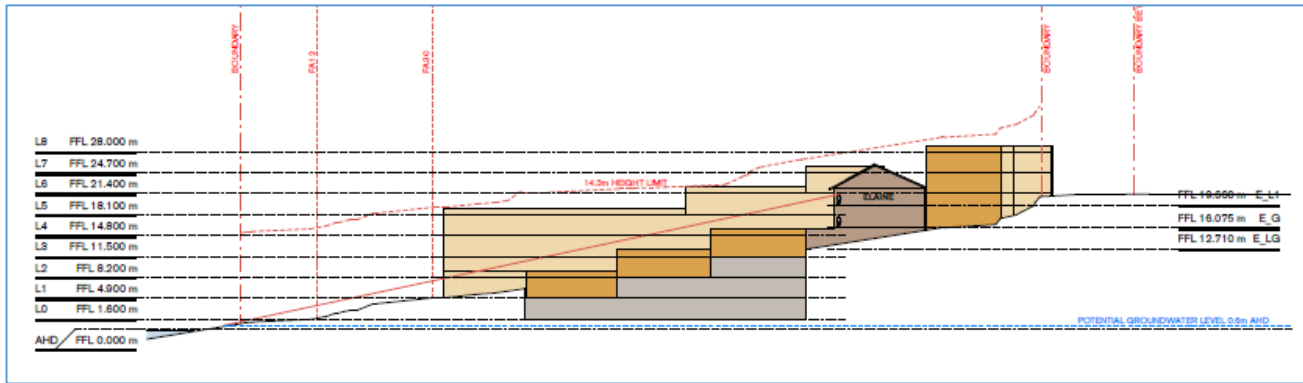


Figure 6 Massing section "Elaine" retained

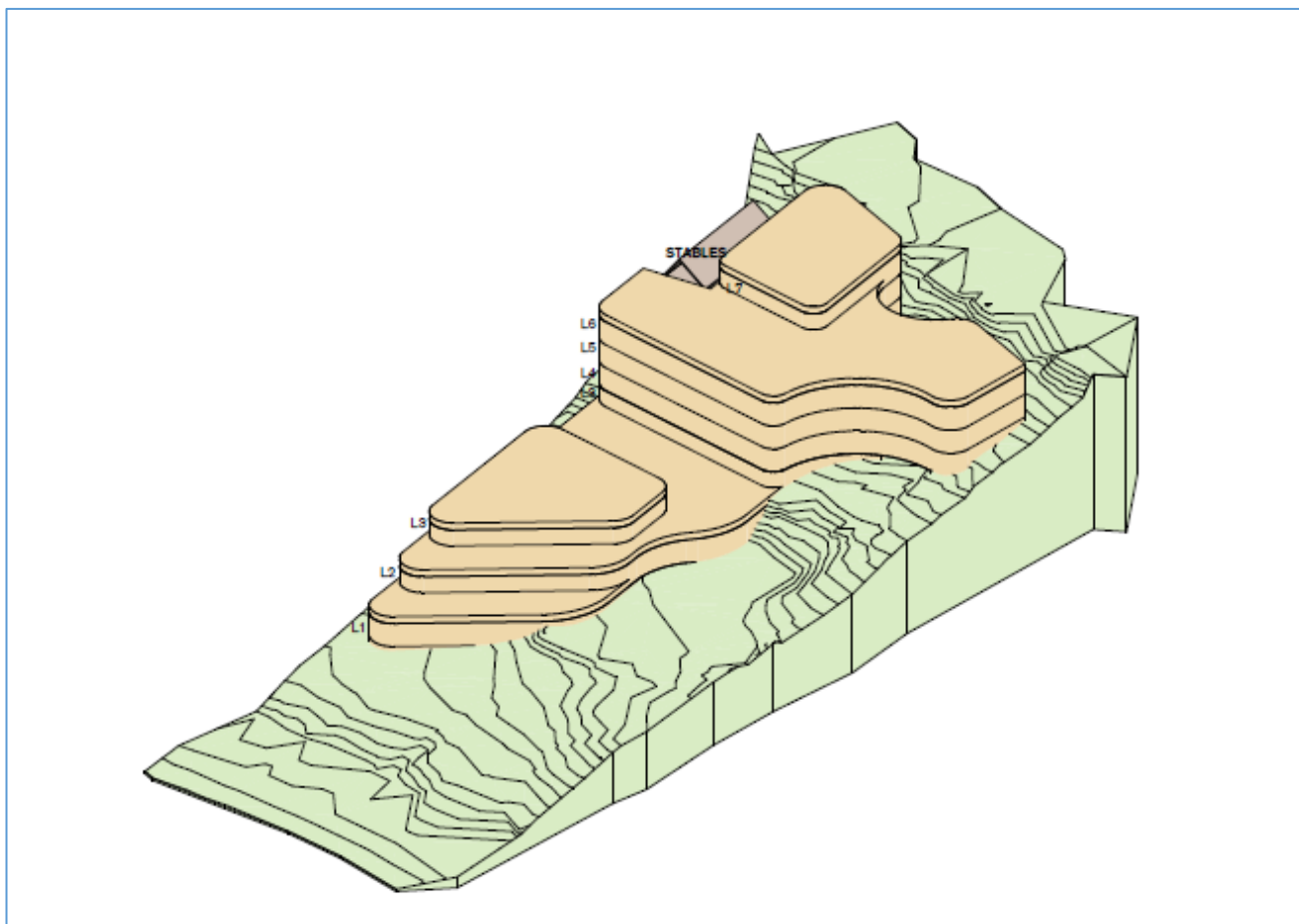
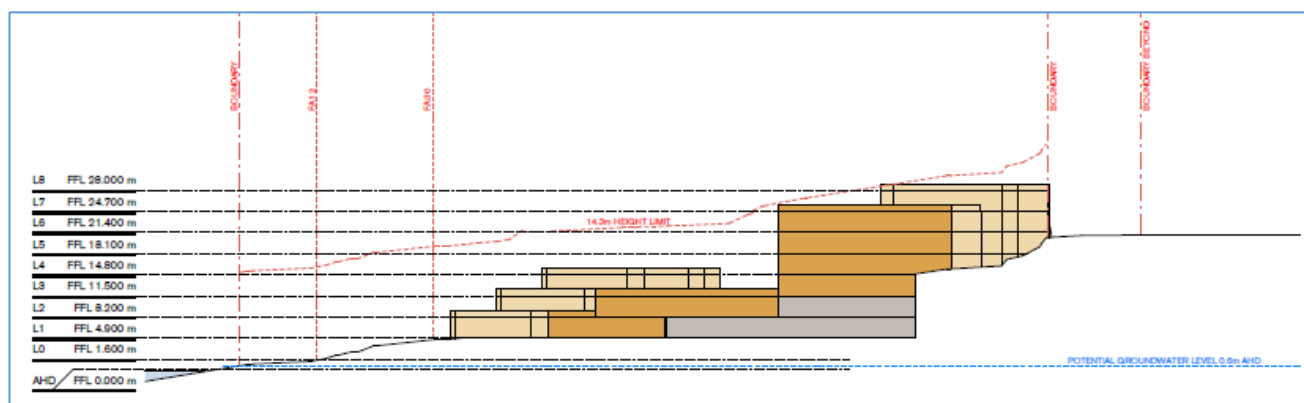


Figure 7 Massing option with "Elaine" removed



**Figure 8 Massing section “Elaine” removed**

## 7.3 Guiding design approach

The proposal will be guided by principles of design excellence, universal accessibility, wellness and integration with heritage and landscape values. Conceptual massing studies demonstrate that a compliant scheme can be achieved within the statutory envelope while delivering high levels of amenity for residents and minimising impacts on adjoining heritage items.

## 7.4 Apartment Design Guide (ADG) and Housing SEPP benchmarks

### Building separation

- The site area enables compliance with ADG separation distances.
- ILUs will be arranged to provide a minimum 12 m separation between habitable rooms and between buildings within the precinct, subject to detailed design.
- Orientation and stepping of built form will reduce bulk and maintain visual permeability across the site.

### Solar access

- Preliminary modelling indicates that more than 70% of ILUs can receive a minimum of two hours direct solar access to living rooms and private open spaces on 21 June.
- Building orientation and modulation will allow RAC facilities to maximise daylight and outlook for residents, consistent with best practice in aged care design.

### Cross-ventilation

- Building depth will be managed to ensure that at least 60% of ILUs are naturally cross-ventilated.
- Common areas in RAC will incorporate operable windows, courtyards and lightwells to promote natural ventilation.

### Deep soil and landscaping

- Significant heritage trees (Cook Pine, Norfolk Island Pine, Bunya Pine, Camphor Laurel and Port Jackson Fig) will be retained and protected.
- Landscape strategy will incorporate extensive new planting, communal gardens and open spaces, exceeding Housing SEPP deep soil requirements.

- Gardens will support dementia-friendly design, sensory planting, and community engagement spaces.

#### Accessibility and universal design

- All ILUs will be designed to meet Australian Standard AS4299 (Adaptable Housing) and Housing SEPP accessibility provisions.
- Step-free access will be provided across the site, with lifts serving all levels.
- Common facilities will incorporate dementia-friendly wayfinding and accessible amenities.

## 7.5 Heritage and landscape integration

- Building siting and setbacks will ensure the visual primacy of heritage trees and the harbour foreshore landscape.
- Conceptual scenarios allow for retention or removal of the “Elaine” house, with further assessment of significance to be undertaken through the EIS.
- Any new built form will be designed to sit below the ground floor level of Elaine, preserving existing harbour views from the main dwelling, and maintaining visual connection from the public domain to the water.

## 7.6 Amenity and wellbeing

- ILUs will be designed for generous space, balconies and shared amenity areas.
- RAC facilities will adopt a small household model supporting resident dignity, social interaction and dementia care.
- Ancillary health facilities will be co-located for convenience and seamless care transitions.

# 8 Engagement methodology

## 8.1 Context and history

The Elaine site has a long and complex planning history. Development applications have been lodged over the past two decades, each requiring consideration of heritage significance, subdivision patterns, landscaping, and foreshore character. This has led to fragmented assessments, community concern, and uncertainty around the long-term management of the property. In our view this has also led to a less than optimal planning approval context on the land relating to its setting.

The SSD pathway provides an opportunity to consolidate these issues into a coordinated and transparent process, informed by clear SEARs and a comprehensive Conservation Management Plan (CMP) guided by the multi-disciplinary principles outlined in Section 5.

The proponent is committed to a careful and considered engagement process for the Elaine site. While the property is not listed on the State Heritage Register, it nonetheless presents a unique opportunity to achieve a high-quality planning and design outcome when guided by the right framework. Experience has shown that the best chance of delivering such an outcome is through structured collaboration with council, agencies and the local community.

Engagement specialists engaged for the project have advised that, in the current context, a guided and staged approach will provide the most constructive environment for resolving heritage, landscape and foreshore issues. This approach allows for council and community perspectives to



be incorporated into the CMP and detailed design process in a way that builds trust and common purpose.

The project will be led by a highly experienced and respected multi-disciplinary team, bringing together expertise in design, heritage, culture, social impact, economics, planning, seniors housing and health facilities. This breadth of expertise provides confidence that the issues of greatest importance to stakeholders can be addressed comprehensively.

However, such an engagement program will be capital intensive, requiring detailed technical work and significant resource commitment. To proceed on this basis, the project consortium requires a degree of State-level certainty through the issuing of ISEARs. This will ensure that engagement can occur with confidence, in a transparent and collaborative framework, supported by the department.

## 8.2 Principles of engagement

The engagement program for the SSD will be guided by the following principles:

- **Respectful:** Acknowledge the cultural, heritage and community value of the site.
- **Transparent:** Provide accurate, timely information supported by expert reports.
- **Structured:** Stage consultation in line with SEARs, ensuring dialogue is focused and constructive.
- **Inclusive:** Engage with government, council, and community stakeholders, respecting their different perspectives and interests.

## 8.3 Stakeholders

Engagement will involve:

Government agencies including :

- Heritage NSW
- Government Architect NSW
- NSW Health (for integration of aged care and ancillary health facilities with health system priorities)
- Transport for NSW
- Sydney Water

Council:

- Woollahra Municipal Council, including planning, heritage, open space community services and traffic officers.

Community and civic groups:

- Local residents and precinct committees
- National Trust (given the landscape relationship between Elaine, Blackburn Gardens and Fairwater)
- Heritage interest groups
- Immediate neighbours, including “Fairwater” and Blackburn Gardens

## 8.4 Timing and staging

Engagement will occur post-SEARs to ensure discussions are anchored to defined assessment requirements:

1. **Scoping stage (current):** Request for ISEARs – set the framework for the EIS.
2. **Post-SEARs agency engagement:** Targeted meetings with NSW Health, Heritage NSW, GAO and council to refine CMP scope, design principles and health service integration.
3. **Community engagement during EIS preparation:** Presentation of conceptual plans, landscape strategy and heritage approach to local stakeholders, including the National Trust.
4. **Public exhibition:** Formal consultation in accordance with SSD requirements.

## 8.5 Role of the conservation management plan

The CMP will be central to the engagement program. By advancing the CMP through agency and community consultation post-SEARs, it will ensure that heritage values are not pre-determined but are considered in balance with housing, health and social outcomes. This approach provides confidence that the final SSD application will be evidence-based and respectful of the site's cultural heritage.

### 8.5.1 Benefits of this approach

- Avoids repetition of fragmented DA processes.
- Ensures heritage, health and housing issues are addressed holistically within the SSD framework.
- Provides the department with assurance that engagement will be meaningful, not tokenistic, and sequenced to maximise effectiveness.

## 9 Indicative timing and next steps

### 9.1 Program for lodgement

It is proposed to progress the SSD application in accordance with the following indicative program:

- Q3 2025 – Department issues ISEARs (current request).
- Q4 2025 – Preparation of Environmental Impact Statement (EIS), including detailed architectural design, updated Conservation Management Plan (CMP), traffic and access studies, social impact assessment, and statutory compliance testing.
- Q1 2026 – Lodgement of SSD DA and EIS.
- Q2 2026 – Assessment and determination of SSD DA.

### 9.2 Engagement milestones

Consistent with the engagement methodology set out in Section 6, the following key steps are envisaged:

- **Post-SEARs agency workshops** – Heritage NSW, Government Architect NSW, NSW Health, and Woollahra Council to refine CMP and design principles.

- **Community consultation during EIS preparation** – targeted meetings with local stakeholders, including the National Trust and neighbours such as Fairwater and Blackburn Gardens.
- **Formal public exhibition** – statutory exhibition of the SSD DA/EIS, supported by accessible materials.

### 9.3 Key technical investigations

The EIS will be informed by the following specialist inputs:

- **Heritage and CMP update** (including house, grounds, trees, foreshore wall).
- **Aboriginal cultural heritage** and connecting with Country design framework
- **Urban design and visual impact assessment** (foreshore setting, view sharing).
- **Traffic and parking assessment** (right-of-way and on-site parking strategy).
- **Landscape design and arboricultural assessment** (retention of significant trees, new gardens).
- **Social impact assessment** (seniors housing needs, community integration).
- **Health planning input** (integration of RAC, ILU, and ancillary health services with NSW Health priorities).
- **Environmental studies** (stormwater, geotechnical, contamination, biodiversity if required).

### 9.4 Next steps

- Seek the Department's issue of ISEARs for the project.
- Following SEARs, advance concept design and technical studies to EIS standard.
- Progress agency and community engagement consistent with SSD process.
- Prepare and lodge SSD DA and EIS before the end of 2025.

## 10 Conclusion

The Elaine site provides a rare opportunity to deliver a seniors housing development of State significance in a location with demonstrated demand and high community value. The project will provide integrated housing, aged care and health services that directly address social need, improve local health outcomes and allow older residents to age in place within their community.

The SSD pathway under clause 26A of the Planning System SEPP 2021 is the appropriate mechanism to progress this outcome. It will ensure that heritage, design, social, health and environmental considerations are resolved holistically through a transparent assessment process. The proposal is capable of compliance with the statutory framework and will be informed by a Conservation Management Plan and multi-disciplinary expert input.

On this basis, it is respectfully requested that the department issue industry SEARs for the preparation of an EIS, enabling the project consortium to proceed with confidence and to invest in a detailed design and engagement program that will secure a high-quality planning outcome for the site, the community and the State.

## 11 Appendix A - Preliminary Healthcare Development Assessment – Integrated Seniors Living and Healthcare Precinct for Elaine

### Summary

**Prepared by:** Independent consultants Arrow Advisory engaged for the Elaine project team (report dated 28 August 2025).

**Purpose and content:** This report assesses the need for an integrated seniors living and healthcare precinct at the Elaine site in Double Bay. It draws on ABS Census data, Australian Institute of Health and Welfare (AIHW) statistics, and local catchment analysis (SA2 and SA3 boundaries) to establish demographic trends, health status and service gaps. It also benchmarks the proposal against comparable facilities such as Mark Moran Vaucluse and reviews the potential for workforce development and community benefits.

### Key findings:

- Woollahra has one of Sydney's oldest populations, with 20.9% aged 65+ and 3.2% aged 85+.
- Demand for both independent living units (ILUs) and residential aged care (RAC) is forecast to grow strongly, with a local shortfall of aged care beds emerging in the next decade.
- The catchment has limited seniors living supply (five villages, fragmented across 14 RAC facilities with 1,027 beds).
- Older Australians face a high chronic disease burden (80% with one or more chronic conditions), highlighting the need for co-located health and wellbeing services.
- The proposed Elaine precinct would deliver RAC beds (80–100), ILUs (around 120), assisted living apartments, a general practice clinic, allied health suites, rehabilitation facilities, and community amenities.
- The model integrates housing and healthcare, enabling ageing in place and reducing strain on local hospitals and council services.
- The project will also generate significant employment in aged care, allied health, hospitality and training, and create a community hub with shared amenities.

**Relevance to scoping report:** This assessment demonstrates the strong social and healthcare need that underpins the Elaine SSD proposal. It provides an evidence base for including residential aged care, independent living units and ancillary health facilities as part of the project. The findings reinforce the proposal's alignment with State objectives for seniors housing, integrated care and community wellbeing, and justify the need for the Department to issue ISEARs so that these issues can be addressed in a coordinated SSD process.