Environmental Impact Statement

Narwee Parklands Care Community

59-67 Karne Street North, Narwee
On behalf of Principal Healthcare Finance Pty Ltd

Ethos Urban

Prepared by Ethos Urban
Submitted for Principal Healthcare Finance Pty Ltd

19 January 2023 | 2220069

'Gura Bulga'
Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.

By using the green and blue colours to represent NSW, this painting unites the contrasting landscapes. The use of green symbolises tranquillity and health. The colour cyan, a greenish-blue, sparks feelings of calmness and reminds us of the importance of nature, while various shades of blue hues denote emotions of new beginnings and growth. The use of emerald green in this image speaks of place as a fluid moving topography of rhythmical connection, echoed by densely layered patterning and symbolic shapes which project the hypnotic vibrations of the earth, waterways and skies.

Ethos Urban acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We acknowledge the Gadigal people, of the Eora Nation, the Traditional Custodians of the land where this document was prepared, and all peoples and nations from lands affected.

We pay our respects to their Elders past, present and emerging.

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Contents

Table of Figures

Table of Tables

Appendices

A Architectural Plans

Group GSA

B Design Report

Group GSA

C Design Review Report

Group GSA

D Survey Plan

VMark Survey

E Landscape Plans

Taylor Brammer

F Arboricultural Impact Assessment

Moore Trees

G Biodiversity Development Assessment Report and Waiver

Travers Bushfire and Ecology

H Aboriginal Cultural Heritage Assessment Report

Dominic Steele Consulting Archaeology

I Landscape Design Report

Taylor Brammer

J Remediation Action Plan

Geotechnique

K Social Impact Assessment

Ethos Urban

L Economic Impact Assessment

Ethos Urban

M Building Code of Australia Compliance Report

Formiga1

N Accessibility Report

Accessible Building Solutions

O Infrastructure and Utilities Statement

DSC

P Traffic and Accessibility Impact Assessment

Colston Budd Rogers and Kafes

Q Environmentally Sensitive development Report

JHA

R Geotechnical Site Investigation

Geotechnique

S Noise and Vibration Impact Assessment

Pulse White Noise

T Stormwater Management Plan

Henry & Hymas

U Detailed Site Investigation and Remediation Action Plan

Geotechnique

V Operational Waste Management Plan

UFD

W Construction Waste Management Plan

UFD

X Hazardous Material Survey

Trinitas Group

Y Community Engagement Outcomes Report

Ethos Urban

Z Crime Prevention through Environmental Design Report

Ethos Urban

AA Civil Plans

Henry and Hymas

BB Clause 4.6 Variation Request

Ethos Urban

CC Flood Report

TTW

DD Canterbury Development Control Plan 2012 Compliance Table

Ethos Urban

EE Heritage Impact Statement

Dominic Steele Consulting Archaelogy

Under Separate Cover

Owners Consent

Cost Summary Report

EIS Declaration

Project Details	
Project Name	Narwee Parklands Care Community
Address of the land to be developed	59-67 Karne Street North, Narwee
Development Application Details	
Applicant Name	Principal Healthcare Finance Pty Limited
Applicant Address	11/420 George Street, Sydney NSW 2000
Prepared by	
Name	Daniel West
Qualifications	BEP, MPIA
Address	173 Sussex Street, Sydney NSW 2000
In respect of	Narwee Parklands Care Community - State Significant Development Application
Declaration	
Name **Registration Number** **Organisation Registered With**	Schandel Fortu R9852 Planning Institute of Australia The undersigned declares that this EIS: • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project; • identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments; • has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement; • contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development; • contains a consolidated description of the project in a single chapter of the EIS; • contains an accurate summary of the findings of any community engagement; and • contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole
Signature	
Date	January 2023

Executive Summary

Purpose of this Report

This submission to the Department of Planning and Environment (DPE) comprises an Environmental Impact Statement (EIS) for a Development Application under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). It relates to a new seniors housing development comprising a new residential care facility (RCF) development at 59-67 Karne Street North, Narwee (known as Narwee Parklands Care Community).

Development for the purposes of seniors housing with a capital investment value (CIV) of more than $30 million is identified in Schedule 1 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) as State Significant Development (SSD) for the purposes of the EP&A Act. A CIV Statement has been prepared by Slattery confirming that the project has a CIV of more than $30 million (provided under a separate cover) and the proposal, is therefore SSD.

A request for the issue of industry-specific Secretary's Environmental Assessment Requirements (SEARs) was made on 15 June 2022. The SEARs were issued on 22 June 2022 (SSD-45024776). This submission is made in accordance with the DPE's guidelines for SSDA applications lodged under Part 4 of the EP&A Act, and addresses all issues raised in the SEARs.

Project Overview

This SSDA seeks consent for the detailed design and construction of a new seniors housing development. Specifically, the proposed development will comprise the following works:

- Demolition of all existing structures on the site;
- Site preparation works, excavation and tree removal;
- The construction of a residential care facility (RCF) development comprising of 7,039m^2 gross floor area, including:
  - 165 beds within a single building set over three (3) storeys;
  - Communal facilities including kitchens, dining rooms, lounge rooms and activity rooms on each level;
  - 30 spaces of basement car parking and one at grade ambulance bay.
- Building identification signage and wayfinding;
- Associated landscaping works; and
- Inground building services works and utility works.

The Site

This SSDA relates to the site located at 59-67 Karne Street North, Narwee, within the City of Canterbury-Bankstown Council Local Government Area (LGA). The site is approximately 7,159.6m^2 and has primary frontages to Karne Street North.

Strategic Context

The proposal will deliver a high-quality seniors housing development that will create diversity of housing types for seniors within the City of Canterbury-Bankstown Council and the wider area, through the provision of a residential care facility within an accessible location, with good transport connection and services. The proposal has been informed by a comprehensive urban design analysis with input from other technical studies and reports (Table of Contents). The proposal seeks to address the site's unrealised potential for modern day seniors housing in line with the greater strategic planning framework for the area and deliver an improved built form outcome on the site together with significant public benefits. The proposal is directly consistent with the overarching themes and requirements of all relevant plans, policies and guidelines, which include:

- NSW State and Premier's Priorities;
- Greater Sydney Region Plan;
- South City District Plan;
- Canterbury-Bankstown Local Strategic Planning Statement;

- Canterbury-Bankstown Local Housing Strategy;
- Government Architect NSW Connecting with Country;
- Future Transport Strategy 2056; and
- Crime Prevention through Environmental Design (CPTED) Principles.
- Better Placed: An integrated design policy for the built environment of New South Wales.

These plans and policies illustrate that the LGA and wider region is expected to experience an increase in population and an ageing demographic. Accordingly, the proposed development will have regard to the capacity of the site, it's strategic location and ability to support its renewal into a seniors housing development. This will allow the existing community to age in place and will meet the expected market penetration for seniors housing. Further, it is considered that the proposed development will directly respond to Council's desire to provide diverse housing opportunities and community services within the area.

Section 2.5 of the EIS further identifies the key issues that are relevant to the Project's locational and strategic context and provides a justification for the Project in light of this context.

Statutory Context

The site is zoned R3 Medium Density Residential under the *Canterbury Local Environmental Plan 2012* (CLEP 2012). The proposal is for seniors housing, which is permissible with consent within the R3 zone.

As the proposed development comprises a RCF and has a CIV of more than $30 million, the proposal is State Significant Development in accordance with Schedule 1 clause 28 of the *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP).

The *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) applies to development for the purposes of seniors housing within the R3 Medium Density Residential zone, amongst others and sets out certain development standards and criteria that override local planning provisions.

Under the CLEP 2012, the site is subject to a base FSR of 0.5:1 and a base height of building of 8.5m. However, the Housing SEPP affords the site a non-discretionary FSR standard of 1:1 and 9.5m maximum building height.

Engagement

Consultation has been undertaken with various stakeholders including the DPE, City of Canterbury-Bankstown Council and the NSW Government Architect State Design Review Panel (SDRP).

Alongside this, consultation has also been undertaken with local residents, community members, and representatives of local Aboriginal and Torres Strait Islander community and stakeholder groups. The outcomes of the consultation process have been considered in the design of the proposed development and are discussed in **Section 4.0** and at **Appendix Y.**

Environmental Impacts and Mitigation Measures

This EIS provides an assessment of the environmental impacts of the project in accordance with the SEARs and sets out the undertakings made by Opal Healthcare to manage and minimise potential impacts arising from the development.

The key environmental matters identified include:

- Urban design, built form and design excellence;
- Amenity impacts including overshadowing, visual and view impacts;
- Public domain and landscaping;
- Social and economic impacts and benefits; and
- Sustainability.

The proposed development has been assessed in each of these instances by technical experts across a range of disciplines as guided by the SEARs and industry best practice. These assessments confirm that while there may be potential impacts resulting from the change of the existing conditions on this, these can be appropriately managed and mitigated.

On balance, the proposed development is considered to be in the public interest and will not result in any unacceptable social, economic or environmental impacts that cannot be appropriately managed through the identified mitigation measures and conditions of consent.

Conclusion and Justification

Having regard to the biophysical, economic and social considerations including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The proposal will facilitate the redevelopment of the site for the purposes of seniors housing, which will deliver important social and economic benefits to the community by contributing to housing diversity and affordability for the increasing older population;
- The proposal has been carefully designed to provide a contextual response to the site setting and minimise perceived bulk and scale impacts to adjoining properties;
- The proposed contemporary and modern built form and urban design will significantly improve the quality of seniors housing stock within the City of Canterbury-Bankstown;
- The proposed development provides a high quality architectural design that will contribute to a safe, secure and active environment;
- The proposed development is entirely consistent with the aims and objectives of the relevant strategic planning framework, particularly the South District Plan by increasing the supply of seniors housing commensurate to forecasted demand in the catchment and LGA;
- The proposal represents a significant investment opportunity where it will provide a modern residential care facility and will deliver approximately 300 construction jobs and 180 jobs during the operational phase;
- The proposal will facilitate the delivery of new landscaped areas, tree planting and an improved public domain interface, including consideration of the biodiversity values in the eastern portion of the site;
- The assessment of the proposal has demonstrated that the development will not result in any environmental impacts that cannot be appropriately managed, consistent with the relevant planning controls for the site; and
- The proposal is consistent with the principles of ecological sustainable development as defined by Section 190 of the *Environmental Planning and Assessment Regulation 2021*.

Given the merits described above, and the significant benefits associated with the proposed development, it is requested that the application be approved.

1.0 Introduction

This Environmental Impact Statement (EIS) is submitted to the Department of Planning and Environment (DPE) pursuant to Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) in support of an application for State Significant Development (SSD). This application relates to the construction of a new residential care facility (RCF) at 59-67 Karne Street North, Narwee (the site).

The proposal is SSDA under Schedule 1 of the Planning Systems SEPP, as it is development for the purpose of seniors housing with a capital investment of more than $30 million.

The report is based on the Architectural Plans prepared by Group GSA (see **Appendix A**) and other supporting technical information appended to the report (see Table of Contents).

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, Clause 175 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation), and the issued SEARs. **Attachment A** provides a SEARs compliance table that shows where the SEARs have been addressed in this EIS. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report. The EIS intends to inform the community and stakeholders about the Project, including its social, economic and environmental impacts, mitigation measures and benefits, as well as providing an environmental assessment of the project.

1.1 The Applicant

The Applicant's details are presented in **Table 1** below.

Table 1 Applicant Details

Applicant:	Principal Healthcare Finance Pty Limited
Address:	11/420 George Street, Sydney
ABN:	33 069 875 476

Principal Healthcare Finance Pty Ltd operates as Opal HealthCare (Opal). Opal manage 91 residential care communities, located in metro and regional areas in New South Wales, Victoria, Queensland, and Western Australia. They offer a range of accommodation and living options – including private and companion rooms aiming to provide comfort and privacy for seniors.

Opal focus on providing a friendly and inviting atmosphere for all their residents and families through delivering high-quality clinical care, social and recreational programs. This is extended through supporting community connections and extending to residents' health, wellbeing, and independence. Opal's purpose is to bring joy to those they care for and Opal's service to their residents and families is underpinned by the values of Compassion, Accountability, Respect and Excellence.

1.2 Overview of Proposed Development

This SSDA seeks redevelopment of the site for the purposes of seniors housing. Specifically, this SSDA seeks approval for:

- Demolition of all existing structures on the site;
- Site preparation works, excavation and tree removal;
- The construction of a residential care facility (RCF) development comprising of 7,039m^2 gross floor area, including:
  - 165 beds within a single building set over three (3) storeys;
  - Communal facilities including kitchens, dining rooms, lounge rooms and activity rooms on each level;
  - 30 spaces of basement car parking and one at grade ambulance bay.
- Building identification signage and wayfinding;
- Associated landscaping works; and
- Inground building services works and utility works.

1.3 Objectives of the Development

The objectives of the proposed development are to:

- Facilitate the redevelopment of a large, underutilised site under single ownership in an existing residential location close to parks and shops;
- Provide a seniors housing RCF development where:
  - Residents are able to age in place with continuum of care;
  - World class urban design and architectural quality to create a high quality place;
  - Building design and innovation to meet modern day standards of seniors living;
  - High quality accessible open space for the enjoyment of seniors residents;
  - Inclusive, high amenity places to optimise community interaction; and
  - Built in flexibility to meet the needs of tenants now and into the future.
- Respond to the public domain and surrounding natural spaces by providing substantial landscaped screening to all boundaries of the site; and
- Contribute to the sustainability of the site through the use of environmentally sensitive design initiatives including renewable energy, water sensitive urban design initiatives, and an improved landscaped interface with the public domain.

1.4 Project Background

1.4.1 State Design Review Panel

Two (2) State Design Review Panel (SDRP) meetings were held with the Government Architect of NSW (GANSW) on 24 August 2022 and 12 October 2022.

The feedback from the GANSW following the first SDRP meeting relating to Connecting with Country, site strategy and landscaping, architectural expression and sustainability was incorporated into the updated scheme which was presented on 12 October 2022. The following elements of the design approach in the second SDRP were supported by the GANSW:

- The cultural mapping of the site and potential use of Aboriginal design;
- Rationalisation of external courtyards, open spaces, and reconfiguration of the western courtyard, creating a strong connection to the street and better amenity for the living spaces;
- Design development of the south wing to retain tree number 6;
- Reorientation of the western wing, rotating the apartments by 90 degrees;
- Landscaped green roof to the port-cochere; and
- Warm and inviting façade materials including the blue brick at lower level.

The recommendations and comments following the second SDRP meeting have been considered in the proposed design as detailed in **Section 4.0** below.

1.4.2 Pre-DA Meeting

A pre-DA meeting was held with Council and the proponent on 26 September 2022. Council officer's provided advice and feedback on the proposed development, which identified several matters relating to streetscape and public domain, internal amenity, materiality, traffic and access, environmental management including biodiversity, waste management, flood management and water sensitive urban design (WSUD).

The proposed development has considered the advice received at the Pre-DA Meeting where possible, as well as advice received from the State Design Review Panel as discussed in **Section 4.2**.

2.0 Strategic Context

This chapter identifies the key issues that are relevant to the project's locational and strategic context and provides a justification for the project in light of this context. The chapter also provides an analysis of alternatives that were considered as part of the scoping process.

2.1 Site Location and Context

The site is located in the residential area of the suburb of Narwee, to the north of the M5 South Western Motorway in the City of Canterbury-Bankstown Local (LGA) with a street address of 59-67 Karne Street North, Narwee. It is situated approximately 15km south west of the Sydney Central Business District (CBD) and 15km to the south east of the Parramatta CBD. Narwee railway station is approximately 700m south east of the site.

The immediate surrounds are characterised by predominantly low to medium density residential development to the north, west and east, with the Riverwood industrial area 300m to the west of the site. Bennett Park, a local community park and sports oval, is approximately 200m to the west of the site.

A map illustrating the sites location and context is provided below in **Figure 1**.

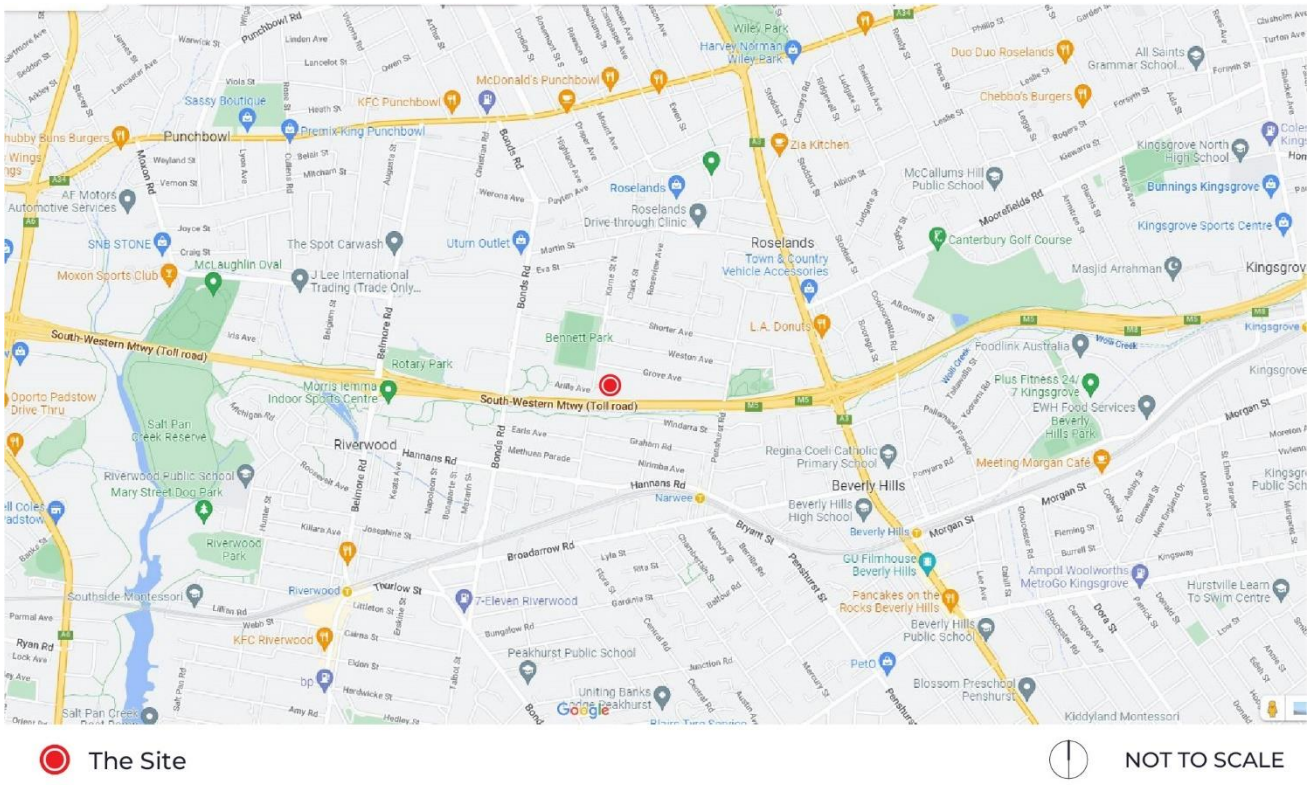


Figure 1 Site Location

Source: Ethos Urban / Nearmap

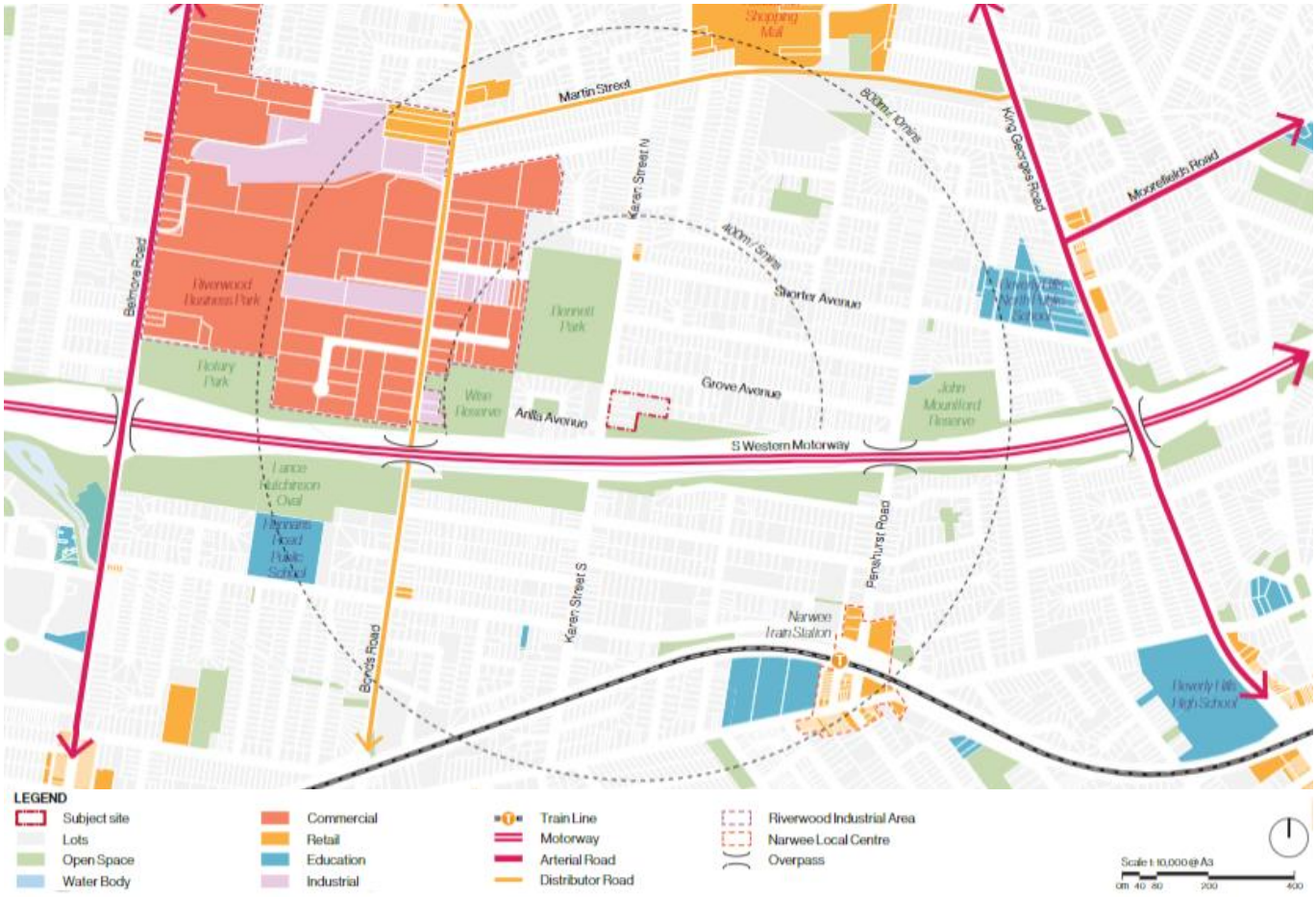


Figure 2 Context analysis

Source: Group GSA

2.2 Site Description

The site is irregular in shape and has an area of 7,149m^2. The site has the following legal description:

Lot	DP
D	403467
C	403467
2	518877
2	16063
3	16063

The site has a fall from the north east to the south west of 6m. It has a 74m street frontage to Karne Street North to the west of the site. Until 2016, the site was used as single dwellings and a seniors housing development comprising a RCF and a respite care facility operated by BUPA (refer to **Figure 4**). An aerial image of the site is shown at **Figure 3** and a Survey Plan is included at **Appendix D**.

Figure 3 Site Aerial

Source: Nearmap / Ethos Urban

Figure 4 Pre-existing BUPA residential care facility

Source: Google Maps

2.3 Key Features of Site and Surrounds

2.3.1 Existing Development

59-63 Karne Street North comprises generally vacant land with scattered vegetation, grass and mature trees near the western boundary and eastern boundary. 65 and 67 Karne Street North contain a single dwelling and outbuildings on each lot. The whole site is currently fenced off from the public domain on all boundaries.

Photographs of the existing site are shown below in **Figure 5** to **Figure 8**.

Figure 5 View from the vacant dwellings on the site near Karne Street North

Figure 6 View from the south western corner of the site

Figure 7 View from the eastern rear of the site from the Richard Podmore Dog Park

Figure 8 View of the centre of the site from the Richard Podmore Dog Park

2.3.2 Vegetation

59-63 Karne Street North has largely been cleared, with the site identified as being highly disturbed, with minimal to no understorey present. Remnant vegetation in the form of trees, shrubs and groundcovers are largely concentrated to the western and eastern edges of the site and includes varied exotic, Australian native and locally endemic species. The south eastern boundary of the site contains an overhang of Eucalyptus tereticornis from the neighbouring lot. These trees are mapped by the Sydney Metropolitan Vegetation Mapping as PCT 725, equivalent to Cooks River Castlereagh Ironbark Forest Endangered Ecological Community and are identified on the Biodiversity Values Map as shown at **Figure 9** and **Figure 10** below. Further detail is provided in the Ecological Assessment Report (**Appendix G**).

Figure 9 Existing vegetation beyond the eastern boundary of the site

Figure 10 Biodiversity Values Mapping

2.3.3 Topography

The site has a considerable fall from the north to the south, with a drop of approximately 28m AHD from the highest point in the north to 22m AHD to the lowest point in the south east. A Survey Plan is included at **Appendix D**.

2.3.4 Transport and Accessibility

Pedestrian and Vehicular Access

As the site is currently largely cleared and fenced off from the public domain, no pedestrian or vehicle access is available to the site. Two existing driveways are located on 59-63 Karne Street North to Karne Street North to the south west of the site.

The site is located close to main roads including Canterbury Road approximately 1.5km to the north of the site and King Georges Road approximately 1km to the east of the site. The M5 South Western Motorway runs near the south of the site beyond Richard Podmore Park, however can only be accessed from Belmore Road and King Georges Road over 1km to the east and west of the site. The M5 South Western Motorway is part of the Sydney Orbital which connects Narwee with Greater Sydney and beyond.

Karne Street North and surrounding roads are local roads providing access to a number of residential properties as well as the subject site.

Public Transport

Bus stops are located along Karne Street North and Grove Avenue servicing the 941 bus route. The closest stops to the site are 100m to the north of the site and connect the site to Bankstown and Hurstville. Bus stops on Shorter Avenue approximately 350m north of the site provide access to the 944 bus route, connecting the site to Mortdale and Bankstown.

The site is located approximately 1.3km (15 min walk) from the Narwee railway station on the T8 South Line. This station connects the site to Glenfield, Sydney Kingsford Smith Airport and the CBD.

The site's existing access and connectivity to the wider area is shown at **Figure 11** below.

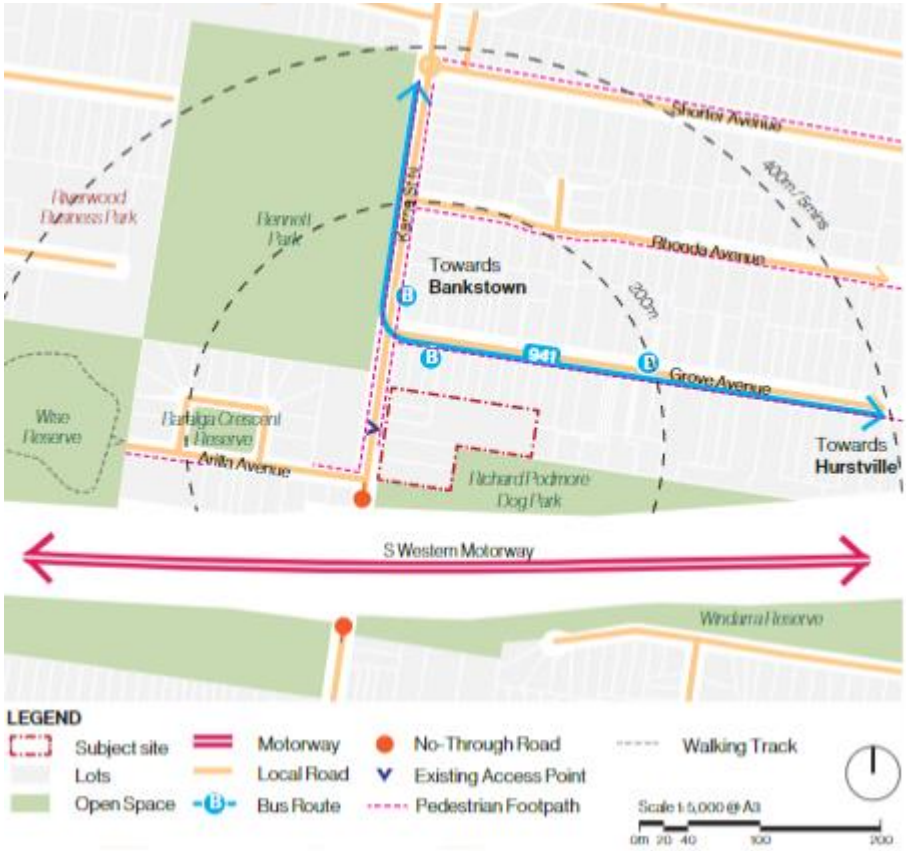


Figure 11 Access and connectivity

Source: Group GSA

2.3.5 Heritage and Archaeology

The site is not heritage listed nor is it located in a heritage conservation area. The site is not proximate to any items of heritage significance. A search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on the study area. The AHIMS search identified no registered Aboriginal objects or places within the subject area, nor are any located within 200m from the site.

An Aboriginal Cultural Heritage Assessment Report and Archaeological Technical Report has been prepared by Dominic Steele Consulting Archaeology and is included at **Appendix H** and **Appendix** Error! Reference source not f ound.. Further discussion is provided at **Section 6.16**.

2.3.6 Contamination

A Phase 2 Detailed Site Investigation and Remediation Action Plan has been prepared by Geotechnique and is included at **Appendix U.**

Various site investigations and remediation works have occurred since 2017. The assessment confirms that the site can be made suitable for the proposed seniors housing development subject to detailed soil sampling, testing for asbestos and the implementation of the RAP. Further discussion is provided in **Section 6.14**.

2.3.7 Soil and Geotechnical Conditions

The geotechnical investigations provided at **Appendix R** indicate the following:

- The sub-surface profile comprises both topsoil/fill and residual soils underlain by bedrock. The depth to bedrock across the site varies from 1.3m to 2.7m from existing ground levels;
- Groundwater is deeper than the proposed base of excavation; and
- Soils likely to be disturbed and/or excavated are non sailine, non-aggressive to steel piles, non-aggressive to mildly aggressive to concrete piles and not acid sulfate soils.

Further detail on the findings of the investigation is provided in **Section 6.10** of this EIS.

2.4 Surrounding Area

The site is generally surrounded by residential development comprising varied building typologies including single detached dwellings and multi dwelling housing. A number of recreational areas are also located near the proposed development. The site's locational context is shown in **Figure 12** to **Figure 15** below.

North

To the immediate north of the site are low density detached single dwellings accessible from Grove Avenue, being single or two storey in height. Similar forms of development are located further beyond. Two neighbourhood shops are 300m north of the site and consist of a restaurant and a hair and beauty salon at the corner of Karne Street North and Shorter Avenue.

South

To the south of the site is the Richard Podmore Dog Park. Further south is the M5 South Western Motorway, with the acoustic wall preventing any views and access further to the south.

East

To the immediate east of the site is low to medium residential development accessed from Grove Avenue. South east of the site is a landscaped area providing a natural buffer between residential development and the M5 South Western Motorway further to the south.

West

To the west of the site is low density residential development. Bennett Park is a community park including sport fields and basic sporting facilities to the north west of the site. The Narwee industrial area is located further west which includes industrial warehouses and manufacturing.

Figure 12 View of dwellings along Grove Avenue

Figure 13 View of Bennett Park

Figure 14 View of the vegetation adjacent to the M5 South Western Motorway

Figure 15 View of the Richard Podmore Dog Park

2.5 Strategic Planning Context

Government plans, policies and guidelines relevant to the Project's strategic context include:

- NSW State and Premier's Priorities;
- Greater Sydney Region Plan;
- South City District Plan;
- Canterbury-Bankstown Local Strategic Planning Statement;
- Canterbury-Bankstown Local Housing Strategy;
- Government Architect NSW Connecting with Country;
- Future Transport Strategy 2056;
- Crime Prevention through Environmental Design (CPTED) Principles; and
- Better Placed: An integrated design policy for the built environment of New South Wales.

Table 2 below summarises the Project's strategic context as established by these documents.

Table 2 Summary of Strategic Context

Plan	Comments
NSW State Priorities	The proposal will deliver on key NSW state priorities. The proposal will deliver on the priority of *'well connected communities with quality local environments'* through the provision of high quality seniors housing, open space and onsite services and facilities. The site also has strategic merit to improve the connectivity of the community by providing accommodation in close proximity to major public transport infrastructure and various bus routes connecting the site to various locations around Greater Sydney as discussed below.
Greater Sydney Region Plan – A Metropolis of Three Cities	In March 2018, the DPE released the final Greater Sydney Region Plan. The plan aims to ensure land use and transport opportunities develop more equitably across Greater Sydney. The proposed development is considered to be consistent with the objectives of the Plan as it will: • Provide services and infrastructure to meet communities' changing needs; • Ensure communities are healthy, resilient and socially connected; • Support greater housing supply in the City of Canterbury-Bankstown LGA; and • Ensure housing is more diverse and affordable. The proposed development will increase the diversity of housing types for seniors within the City of Canterbury-Bankstown LGA by providing additional RCF services to suit modern day seniors housing standards on an underutilised site in an accessible location, within proximity to a range of services and recreational areas. In particular, the proposed delivery of 165 RCF beds recognises an undersupply of aged care beds at 2026 with this increasing at 2031 (-330 and -980 respectively – within the City of Canterbury-Bankstown LGA). Within the wider catchment area (10km radius from the site), the undersupply is expected to be -330 by 2026 and -980 by 2031. Further discussion is provided in the Economic Impact Analysis at **Appendix L.**

Plan	Comments
South City District Plan	The site is located within the South District of Greater Sydney. The South District Plan was released in March 2018 and provides a range of priorities and actions to support strategic growth of Greater Sydney's South District. The South District Plan identifies that there is forecast to be significant proportional growth in older people to 2036, with a 57% increase in people aged 65-84 years and an 85% increase in the 85+ year age group. This will result in 19% of the District's population being aged 65 years and over in 2036, up from 15% in 2016. The Plan recognises that more diverse housing types and medium density housing will create opportunities for older people to continue living in their community, while being close to their established neighbourhood and in proximity to family, friends and existing infrastructure and services. Accordingly, the proposed development aligns with *Planning Priority S5 - Providing housing supply, choice and affordability with access to jobs, services and public transport*, as it: • Recognises the demand for a diverse range of housing and tenures within accessible locations and specifically aged care facilities by increasing the supply of RCF housing in an underutilised, residential zoned site; • Responds to housing preferences in Greater Sydney where people generally prefer to remain within their local area and 'age in place', with 82% of residents moving into a new home within 15km of their former residences; and • Fosters a healthy, creative, culturally rich and socially connected community. Accordingly, the proposed development is consistent with these aims, by demonstrating a commitment to planning for demographic change through the delivery of greater housing choice and community support for seniors. The proposed development will also increase the diversity of seniors housing available in Narwee and provide modern seniors care services to meet the needs of existing and future residents. The proposed development will assist in meeting a forecast undersupply of beds by 2031 in the City of Canterbury-Bankstown LGA and the wider catchment as discussed in the Economic Impact Assessment at **Appendix L**.
Local Strategic Planning Statement Connective City 2036	Canterbury-Bankstown's Local Strategic Planning Statement 2036 (LSPS) sets out a 20 year land use planning vision. The LSPS came into effect on 31 March 2020. The LSPS estimates that population growth in the City of Canterbury-Bankstown will increase from 360,000 in 2016 to 500,000 in 2036. Amongst other things, the LSPS encourages a mix of housing types including seniors housing. While it is expected that the City of Canterbury-Bankstown LGA will meet its estimated housing targets, the development of the proposed RCF will not undermine the strategic objectives of the LSPS and as the proposed development is located on a site formerly providing seniors housing, it will allow for the upgrade of services to better meet the needs of the growing population and to allow for existing residents residing in the Canterbury-Bankstown LGA to age in place.
Local Housing Strategy 2020	The City of Canterbury-Bankstown's Local Housing Strategy 2020 provides direction about when and where future housing growth will occur to 2036 and beyond, consistent with the Central City District Plan. The Housing Strategy identifies that the 70-84 and 85+ age groups will see a 15% additional growth to 2026 and therefore future housing will need to accommodate older and less able residents, such as seniors and elderly residents. The proposed development is capable of directly aligning with the objectives of the Strategy and the community's aspirations. The proposal will utilise a historical seniors housing site to achieve the highest and best use and increase capacity in response to population growth and demographic changes. By redeveloping an existing and underutilised residentially zoned vacant site this will also allow other land within the City of Canterbury-Bankstown to be developed into different housing types and tenures, also responding to the aspirations to provide a range of housing in the LGA. Further, the Economic Impact Assessment at **Appendix L** determines that within the catchment area there will be an undersupply of aged care services in the area and therefore the proposed development will assist in meeting the demand for beds in the catchment area while minimising wait times for the placement of seniors residents requiring these services.
Government Architect's Connecting with Country Framework	The Connecting with Country Framework acts as a guide for developing connections with Country to inform the planning, design and delivery of built environment projects in NSW. First Nations cultural consultants will seek to celebrate and acknowledge the Aboriginal significance of the site. Connection to Country will be incorporated throughout the lifecycle of the project and has formed part of the Architectural Design Report as illustrated and discussed at **Appendix B**.

<table>
<tr><th>Plan</th><th>Comments</th></tr>
<tr><td>Future Transport Strategy 2056</td><td>The Future Transport Strategy 2056 sets the 40-year vision, directions and outcomes framework for customer mobility in NSW, which will guide future transport investment over the long term. The supporting plans provide further detail on customer outcomes or place-based planning documents to guide the Strategy's implementation.

The proposal includes on site parking for residents, staff and visitors and will encourage safe and convenient access for all. The use of public and active transport will also be encouraged given the close proximity of the site to local bus routes and with Narwee railway station located approximately 1.3 km away.</td></tr>
<tr><td>Crime Prevention through Environmental Design (CPTED) Principles</td><td>A CPTED Report has been prepared by Ethos Urban and is included at Appendix Z. Further discussion is provided at Section 6.4.2.</td></tr>
<tr><td>Better Placed: An integrated design policy for the built environment of New South Wales</td><td>The Better Placed Policy includes seven key objectives in the design of the built environment prepared by the Government Architect. A summary of the proposal's consistency with the principles of Better Placed is provided below. Group GSA have provided a design response to the objectives and principles of Better Placed in their Design Report provided at Appendix B.
<table>
<tr><th>Objective</th><th>Comment</th></tr>
<tr><td>Objective 1. Better Fit – contextual, local and of its place</td><td>The proposed development responds to the surrounding context and its location within the residential areas of Narwee. It provides a new seniors housing development at an appropriate scale, responding to the existing site conditions. The new built form has been designed to ensure accessibility and connectivity throughout the site and respond to the natural topography, neighbouring land uses and biodiversity of the site.</td></tr>
<tr><td>Objective 2. Better Performance – sustainable, adaptable and durable</td><td>Opal Health Care has taken a responsible approach to ensuring the principles of the ESD are incorporated into the proposal, ensuring effective and environmentally responsive design initiatives. Further discussion is provided in Section 6.6.</td></tr>
<tr><td>Objective 3. Better for Community – inclusive, connected and diverse</td><td>The proposed development incorporates accessible access to cater to the varying needs of the elderly population who will occupy the RCF. The site will be easily accessed via the street and basement car park.</td></tr>
<tr><td>Objective 4. Better for People – safe, comfortable and liveable</td><td>The proposed development has sought to balance the operational needs of the RCF while providing a fit for purpose building that incorporates high quality design features and amenities to make residents, visitors and staff feel comfortable. The proposed development will also include terraces and several areas of secured open space on the ground floor to enhance passive surveillance to public and private areas. The CPTED principles are discussed in Section 6.4.2 and in Appendix Z.</td></tr>
<tr><td>Objective 5. Better Working – functional, efficient and fit for purpose</td><td>The proposed development will provide a modern and contemporary seniors housing development of a high-quality standard, which will ensure operational efficiency and meet the living and care demands of the growing elderly population.</td></tr>
<tr><td>Objective 6. Better Value – creating and adding value</td><td>The proposed development will accommodate the increasing demand for housing for the increasing elderly population and will provide opportunity for investment in the seniors living sector.</td></tr>
<tr><td>Objective 7. Better Look and Feel – engaging, inviting and attractive</td><td>These design principles have informed the proposed development, which is illustrated in the Design Report prepared by Group GSA and included at Appendix B. A discussion of the principles guiding this development is also provided at Section 3.1.</td></tr>
</table>
</td></tr>
</table>

2.6 Project Justification

As detailed in **Section 7.0** of this EIS, the project is justified in the context of biophysical, social, and economic environments, as well as the proposal's alignment with the objects of the EP&A Act and other statutory instruments applicable to the site.

2.7 Analysis of Alternatives

Three primary options have been considered by Opal Health Care and Group GSA in responding to the strategic need and objectives for the development of the site. This includes not undertaking any works on the site, proceeding with a different use on the site, and proceeding with the proposed redevelopment for the purposes of seniors housing.

Option 1 – Do Nothing

Under the 'Do Nothing' scenario, the site would continue to remain vacant and underutilised. This option does not provide a desirable outcome as it fails to adequately plan for future growth and opportunities to increase the diversity of housing types and care for seniors within the City of Canterbury-Bankstown.

It is also inconsistent with the broader strategic planning policies including the Greater Sydney Region Plan and the South District Plan as outlined in **Section 2.5** above. The 'Do Nothing' approach would represent a missed opportunity to align the future of the site with the State Government's strategic vision to recognise demand for diverse housing types within accessible locations. As discussed in the Economic Impact Assessment at **Appendix L**, the catchment area (10km radius from the site) and the City of Canterbury-Bankstown LGA will experience an under supply of seniors housing beds in 2026 and 2031. Without the proposed development the catchment area will see an undersupply of -300 in 2026 and -1,170 in 2031. Within the City of Canterbury-Bankstown LGA the area will see an undersupply of -330 in 2026 and -980 in 2031. Therefore, the proposed development will support the demand for aged care living within the catchment area and LGA and will address the long term undersupply.

Therefore, the 'Do Nothing' scenario is not considered to be an acceptable approach.

Option 2 – Different Use

The second option available is to redevelop the site for a combination of single dwellings and multi dwelling housing, both of which are permissible land uses within the zone. Single dwellings are the predominant land use within the area, while residential lots containing multi dwelling housing are located on Grove Avenue to the north of the site.

While the use of the site for multi dwelling housing would also be beneficial for housing supply, it does not cater for the increasingly aging population within the South City District. The proposed development is planning for the aging demographic of the area through the delivery of greater modern housing choices and community support for seniors. Indeed, the continuum of care that is proposed to be provided on the site along with easy access to nearby facilities and recreational areas will allow residents the ability to age in place, within their community and social/family support networks. Therefore, noting the need for seniors housing in the area, the 'Different Use' scenario is not considered the preferred or best scenario for the redevelopment of the site.

Option 3 – This Proposal

The proposal involves undertaking the proposed redevelopment for the purposes of seniors housing as outlined in this SSDA (as described in **Section 1.0**). The site is under single ownership, is a significant land holding which is residentially zoned. This allows for seniors housing to be developed on the site with few site constraints. The proposal will deliver seniors housing in the form of a residential care facility and therefore will assist in increasing seniors housing supply, choice and affordability with access to jobs, services and public transport for seniors within Narwee and the wider City of Canterbury-Bankstown and broader South City District.

The proposal will facilitate the efficient construction of a high-quality design that directly responds to the strategic need identified above. Importantly, the proposal supports the rapid population growth of the over 60 years demographic within the City of Canterbury-Bankstown LGA in line with the aim and vision of the State and Local Strategic Framework. Therefore, 'Option 3 – This Proposal' scenario is considered to be the best possible, and preferred outcome for the site.

3.0 Project Description

This SSDA application seeks consent for the development of the site for the purposes of seniors housing. Specifically, the application comprises:

- Demolition of all existing structures on the site;
- Site preparation works, excavation and tree removal;
- The construction of a residential care facility (RCF) development comprising of 7,039m^2 gross floor area, including:
  - 165 beds within a single building three (3) storeys in height;
  - Communal facilities including kitchens, dining rooms, lounge rooms and activity rooms on each level;
  - 30 spaces of basement car parking and one at grade ambulance bay.
- Building identification signage and wayfinding;
- Associated landscaping and public domain works; and
- Inground building services works and utility works.

The proposed development is discussed further in the following subsections and detailed on the Architectural Plans prepared by Group GSA and included at **Appendix A** as well as the Landscape Plans prepared by Taylor Brammer and included at **Appendix E**.

Figure 16 CGI of proposed development as viewed from Karne Street North

Source: Group GSA

Figure 17 CGI of propsoed development as viewed from Richard Podmore Dog Park

Source: Group GSA

A numerical summary of the proposed development is provided in **Table 3** below.

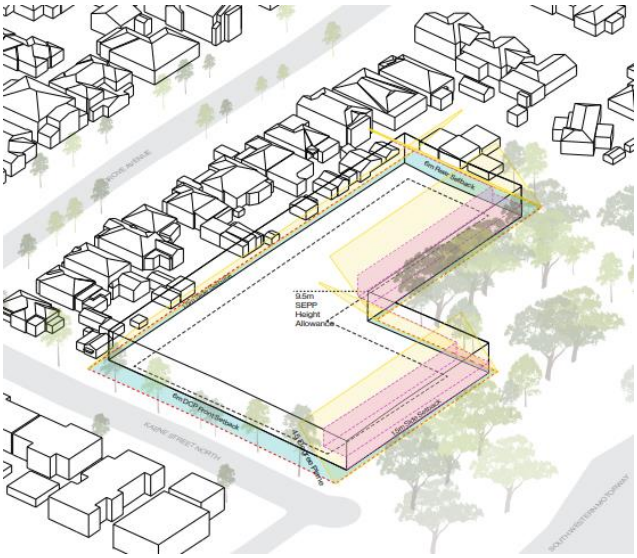
Table 3 Key Project Information

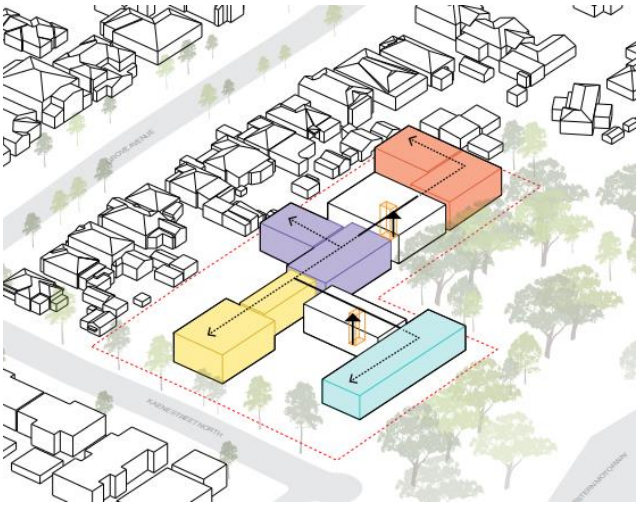
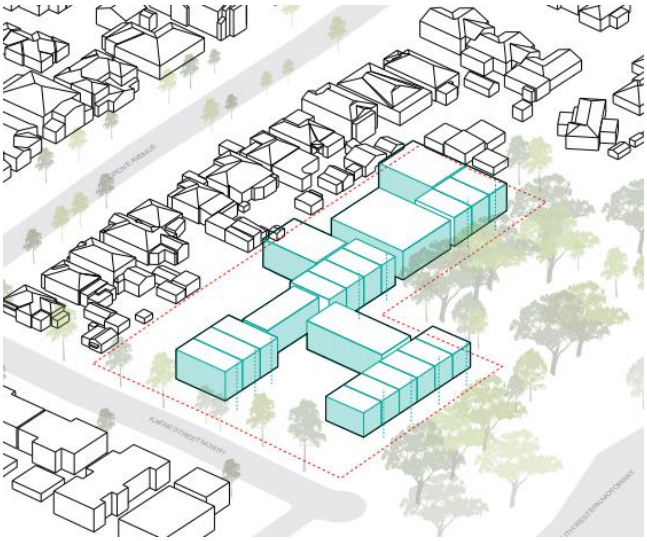
Component	Proposal
Proposed land use	Residential Care Facility (RCF)
Residential care facility beds	165
Site area	7,159.6m^2
FSR	1:1
GFA	7,039m^2
Setbacks	• 6m from the western boundary • 7m from the northern boundary • 7.9m from the north eastern boundary • 9.2m from south eastern boundary • 3m from the southern boundary
Maximum Height	10.6m
Landscaped Area	2,939m^2
Communal Open Space	1,952m^2
Deep Soil	1,911m^2
Operational Jobs	180 (total) AM – 90 PM – 50 Night -12
Hours of Operation	24 hours

3.1 Design Principles

Table 4 illustrates the design principles and urban approaches that have been adopted to ensure the overall vision and objectives for the site are achieved.

Table 4 Urban approaches

Principle	Diagram
Embrace the Natural Setting The design response will embrace the site's natural setting. It will embed a green network of both recreational and ecological spaces that will contribute to the visual quality of the precinct.	
Respond to the Building Envelope Respond to the statutory and strategic controls of the site. Utilise site setbacks and height allowances to integrate into the surroundings and ensure an appropriate contextual fit.	
Respect sensitive interfaces Increase the setback along the southern interface to mitigate noise to the adjacent park. The design response respects the interface, and proposes a landscape buffer that will create a visual barrier for the public as well as a sanctuary for the residents.	

Principle	Diagram
Create Fine Grain Residential Homes Introduce a fine grain residential character, breaking down the mass of the development into smaller clusters. This creates a more human scale and is representative of the surrounding buildings bulk and mass.	
Articulate buildings to complement local character Break the residential clusters into smaller elements to articulate and reflect the existing local developments. Ensure a characteristic of the design is aligned to the surrounding context, reinforced through material selection during the design development phase.	
Connect the Green Strengthen boundary setbacks with vegetation and public spaces, which contribute to and extend the existing canopy cover, benefitting immediate neighbours, increasing privacy, and reducing noise from the Motorway. Introduce large communal open spaces at central locations, linking habitable spaces and extending internal communal areas.	

3.2 Site Preparation Works

Site preparation activities are proposed for the future development. This includes demolition, earthworks, remediation and tree removal.

Demolition

The proposal involves the following demolition and tree removal works:

- Demolition of two existing dwelling houses on the western portion of the site; and
- Demolition of existing hardstand and structures remaining from previous development on the site.

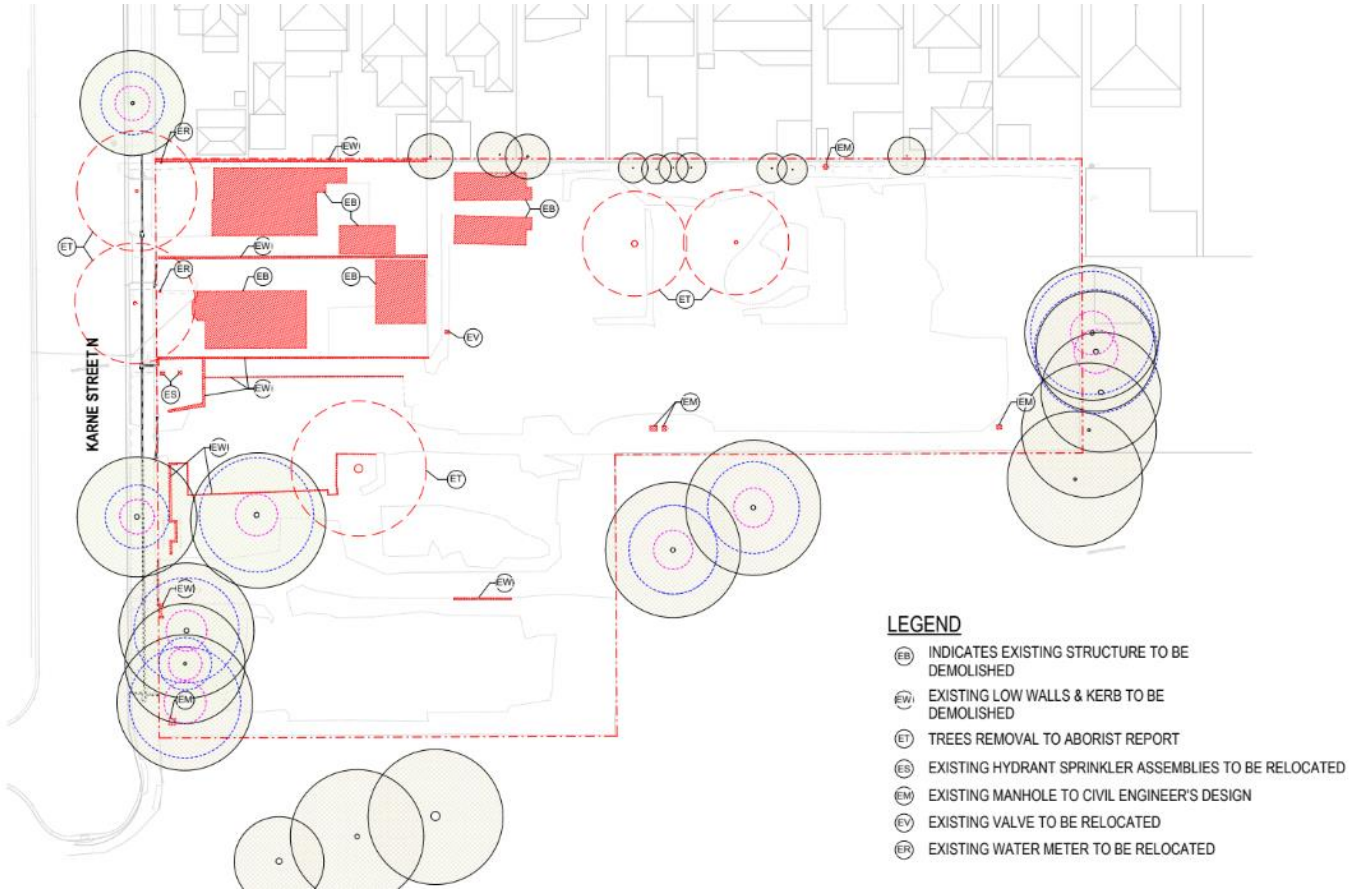


Figure 18 Proposed demolition plan

Source: Group GSA

Earthworks

Bulk earthworks are required to grade the site, excavate proposed basement structures to a depth of 4.5-6.5m and provide platforms for future buildings. The proposed earthworks are generally constructed to the footprints of the proposed building envelopes (discussed further in **Section 3.4**).

The proposed earthworks are detailed in the Civil Plans at **Appendix AA** and discussed in the Civil Engineering Report prepared by Henry and Hymas at **Appendix T**.

Remediation

A Detailed Site Investigation has been prepared by Geotechnique and is included at **Appendix U**. Based on the findings of the investigation, remediation of the site is required and will be undertaken in accordance with the recommended strategies and measures outlined under the Remediation Action Plan provided at **Appendix U**.

Tree Removal

42 trees are located on or near the site. Where possible, the trees will be retained and protection measures will be implemented to enable ongoing protection during construction works. 15 trees are proposed to be removed, which are identified as having a medium-low retention value. This is further discussed in **Section 6.5** below and in the Arboricultural Impact Statement at **Appendix F**

3.3 Site Services and Utilities

An Infrastructure Services Report has been prepared by Donnelly Simpson Cleary to assess the capacity for the site to be serviced (refer to **Appendix O**). All relevant utility and services providers and authorities have confirmed that the site can be serviced subject to some infrastructure upgrades. Utilities connections are detailed below:

- **Electricity**: A substation is proposed within the site near the Karne Street North boundary;
- **Telecommunications**: An application will be made through NBN Co. during the detailed design phase of the project requesting an appropriate service to meet the operational needs along with notification of the required disconnections and possible re-alignment of pit and pipe infrastructure to suit new driveway access;
- **Gas**: A new gas supply is proposed and will connect to the existing network infrastructure on Karne Street North.
- **Water**: Water mains are located on Karne Street North. A Section 73 Application to Sydney Water will be made to confirm water supply for the proposed development.

Further discussion is provided at **Appendix O**.

3.4 Built Form

The proposed development is organised into three separate building wings, with one to the north west of the site, one to the south west of the site and one to the east. The development has a total GFA of 7,039m^2 and a maximum height of 10.6m. The key objective of the design approach is to ensure it is complementary to the context and character of the site and its surrounds.

The proposed building will contain 165 RCF rooms set across three (3) storeys above a common basement level. Residents are housed in shared 'care households' comprising 15 rooms each, across a continuous, consistent flat level. 11 'households' are proposed in total, which all share communal kitchen, dining, gathering area and bathroom facilities. The RCF includes a central back of house commercial kitchen and laundry services as well as a single main front entry and Front of House services with reception, offices, recreational and wellness areas. **Figure 19** below illustrates the proposed building and siting. The Urban Design Report prepared by Group GSA and included at **Appendix B** also provides analysis of how the proposal responds to the adjoining development and the site's locational context.

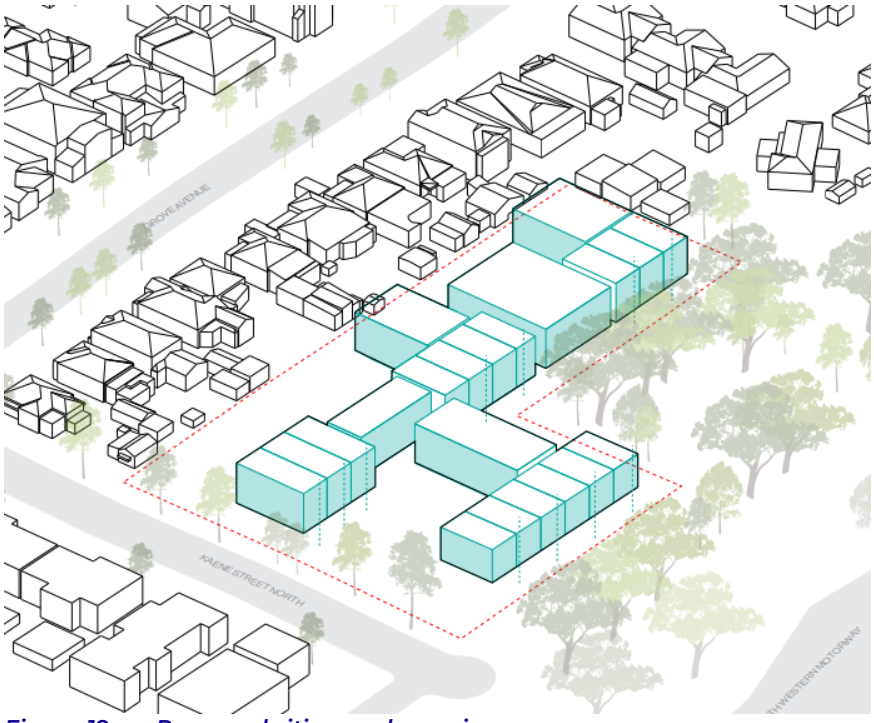


Figure 19 Proposed siting and massing

Source: Group GSA

The Basement Level will comprise 30 car parking spaces, inclusive of 2 accessible spaces. It will also comprise back of house facilities including storage and garbage rooms, loading areas, staff areas including kitchen and laundry facilities as well as end of trip facilities.

The Ground Floor will include the entry into the facility and lobby area. It will be used for general administration and staff areas including medical and health consulting rooms, as well as a salon, private dining, café and other back of house facilities. The Ground Floor will also comprise 45 RCF beds, split into three distinct households comprising 15 beds each.

On Level 1 and Level 2 the proposal will include 60 RCF beds on each level, split into 4 distinct building wings comprising 15 beds in each household. Outdoor terraces and communal facilities including dining and lounge areas, kitchen, activity space and nurse stations will be provided within each household. The building has the following minimum setbacks:

- 6m from the western boundary
- 7m from the northern boundary
- 7.9m from the north eastern boundary
- 9.2m from south eastern boundary
- 3m from the southern boundary

The general arrangement plan for the Ground Floor and Level 1 is shown at **Figure 20** and **Figure 21** below.

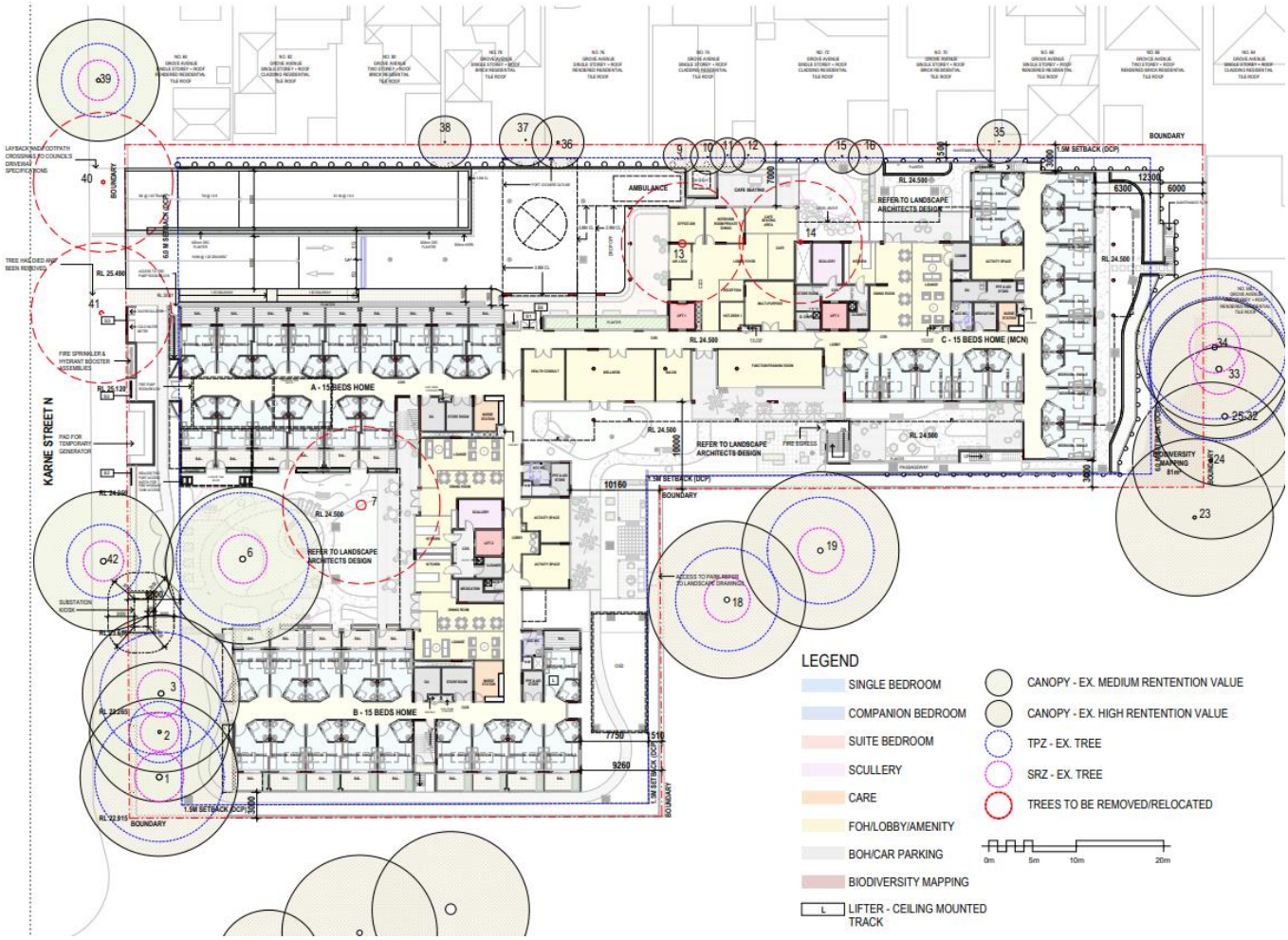


Figure 20 Ground Floor plan

Source: Group GSA

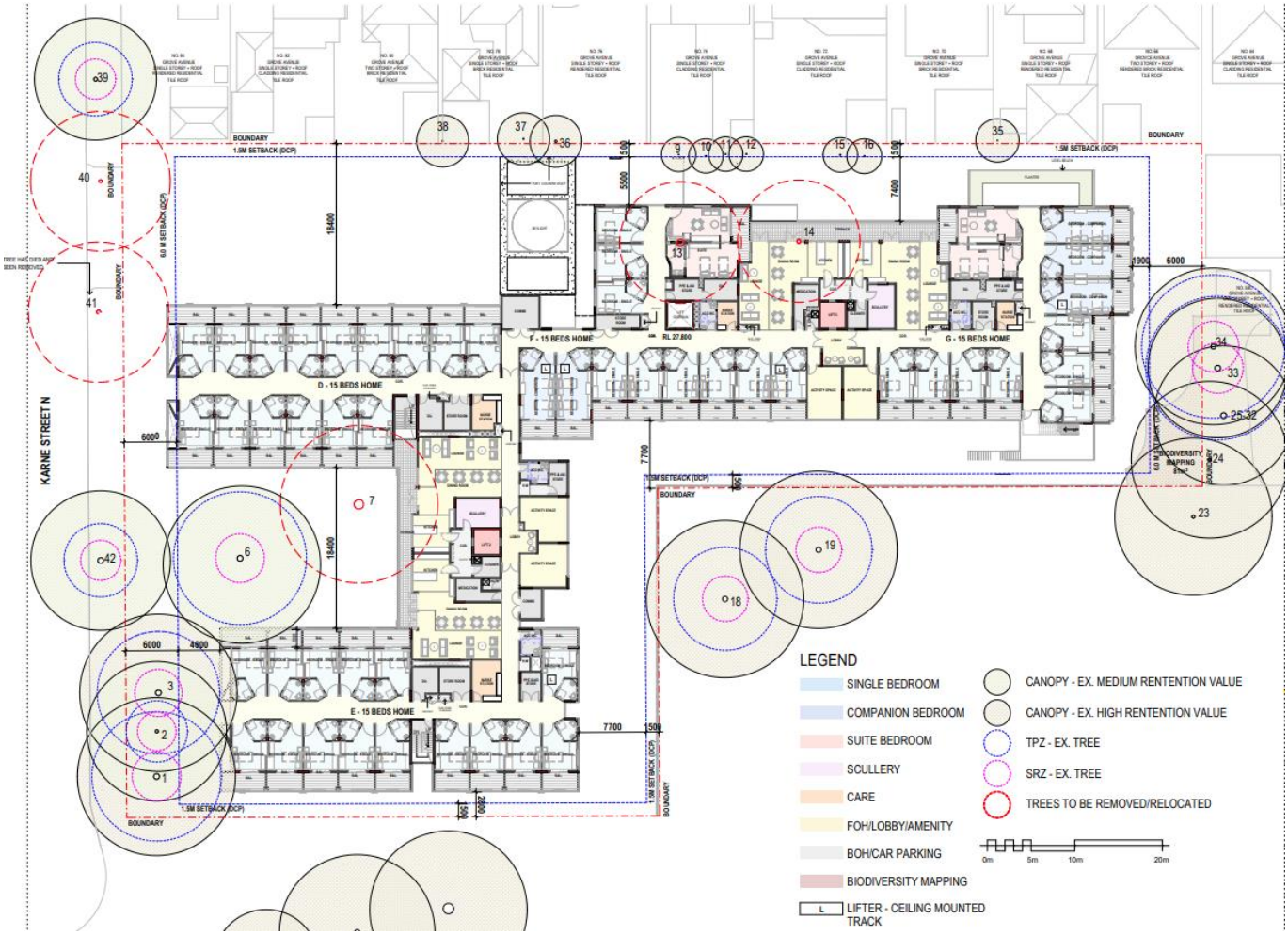


Figure 21 Level 1 plan

Source: Group GSA

3.5 Façade and Materiality

The proposed development will be constructed using various materials and finishes to create a contemporary, high-quality development that is compatible with the surrounding built form, while providing visual interest and amenity to the streetscape. The proposed materials will include different fenestration patterns and colours to be sympathetic to the local landscape settings and the immediate context. Specifically, the materials palette includes:

- Aluminium louvres;
- Mix brick;
- Compressed fibre cement;
- Perforated screens;
- Clay tiling; and
- Louvres.

The proposed materials palette is shown at **Figure 22** and included in **Appendix B**.

Figure 22 CGI illustrating proposed materials as viewed from Karne Street North

3.6 Signage

The proposed development seeks consent for four building identification signage zones on the western elevation of the RCF building facing Karne Street North.

Signage details are outlined in **Table 5**.

Table 5 Signage zone description

Signage	Dimensions	Description
S1	1200mm (W) 600mm (H)	Under awning signage Illuminated
S2	1810mm (W) 915mm (H) 3000mm (flagpole height)	Flagpole and flag
S3	3000mm (W) 600mm (H)	Low height wall signage
S4	1200mm (W) 900mm (H)	Wayfinding signage

Further assessment of the proposed signage is outlined in **Section 5.6.2** and an extract of the signage plan is in **Figure 23**.

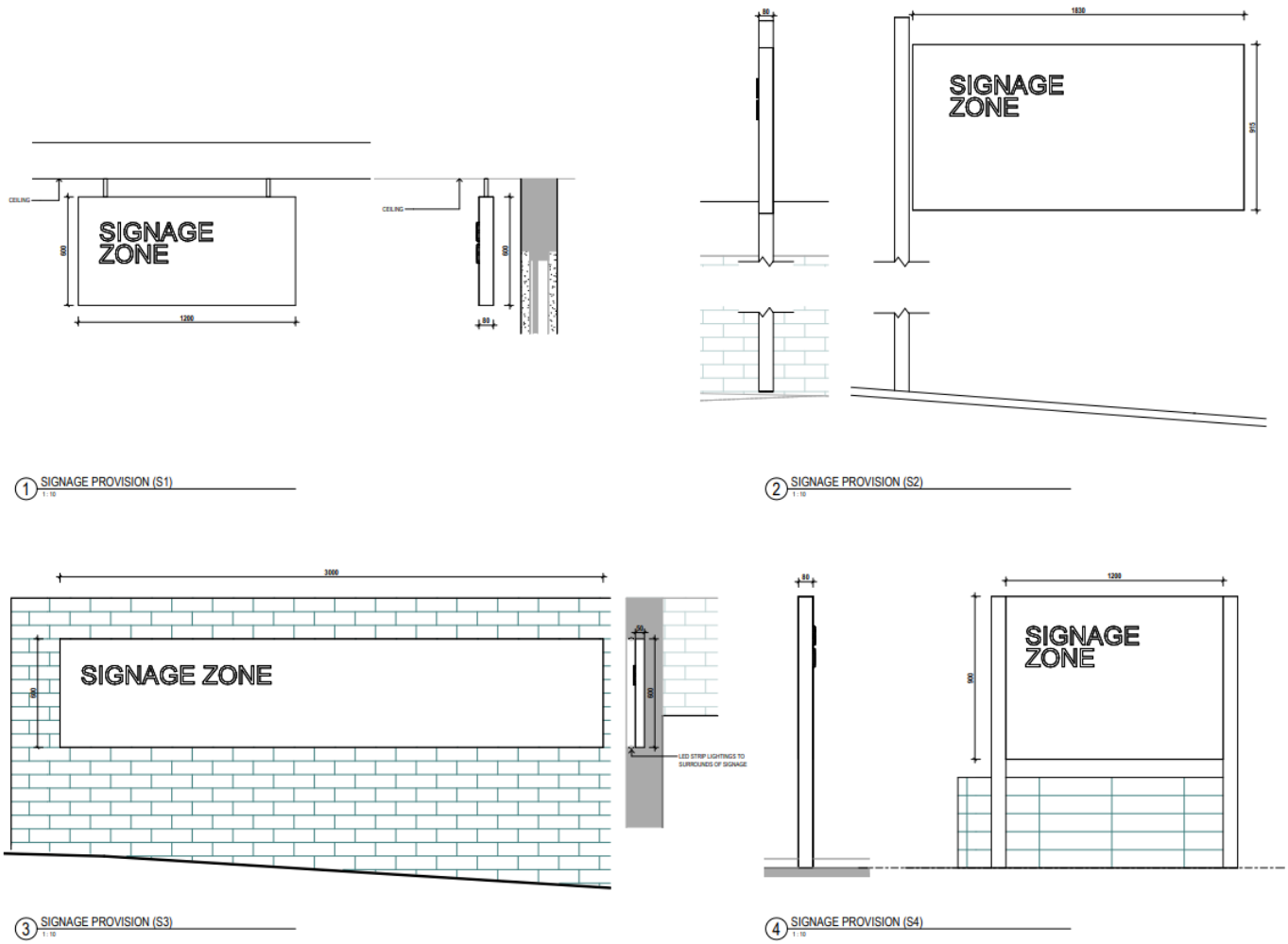


Figure 23 Proposed Signage Zones

Source: Group GSA

3.7 Site Access

3.7.1 Road Network

The proposed development will be serviced by the surrounding road network from Karne Street North to the west of the site. This provides access to the site from regional roads including Canterbury Road, King Georges Road and the M5 South Western Motorway. Further detail on the surrounding road network is provided in the Traffic and Accessibility Impact Assessment at **Appendix P**.

3.7.2 Vehicular Access

Vehicular access to the building is proposed from a new driveway access from Karne Street North. This driveway will provide access to the ambulance bay and porte cochere drop off area (at-grade) and a ramp down to the Basement Level will provide access to the basement car park. All vehicles are able to enter and exit the site in a forward direction.

3.7.3 Pedestrian Access

Pedestrian access is provided to the building from Karne Street North by a walkway to the south of the driveway and north of the proposed building. This walkway provides access to the drop off / pick up area and internal lobby.

3.8 Landscaping

Landscaped area has been provided across the site on the ground level and landscaped terraces on levels above. These include communal landscaped areas, secure garden areas, an inclusive playground and landscape terraces providing natural sensory stimuli to residents. These areas will include varied landscaping treatments providing different space for

residents and staff to utilise. The proposed landscaped areas are shown on the Landscape Plan at **Appendix E** and on the Architectural Plans at **Appendix A**, and are described as follows:

- **Entry Area:** New landscaping is proposed to provide landscaped natural amenity to the pedestrian entry near the lobby area. Feature paving to the porte cochere area frames the main entry to the site, supplemented by low and textural planting to the waiting area outside the lobby. A planting buffer along the northern boundary is provided to screen the site from properties to the north. Seating areas and appropriate lighting and wayfinding will be provided along the pedestrian link to ensure comfort and safety for all residents, visitors and staff using the space.
- **Memory Care Neighbourhood Courtyards:** Two memory care neighbourhood (MCN) courtyards are proposed, one to the north east one to the east of the site. Both MCN courtyards will feature sensitive landscape design to provide natural stimuli to residents. These courtyards both feature a multi functional deck with seating as an informal gathering area. A circuit pathway with rock seating provides opportunity to encourage the use and activate the whole garden area. Deciduous planting is proposed throughout to pique the interest of residents. A garden area is provided to the eastern courtyard. Both areas are fenced off with a 1800mm high fence to protect residents.
- **Wellness Courtyard:** This courtyard is located at the south eastern interface of the site and the dog park. Gardens with potting benches and an outdoor exercise zone is provided to promote activity and use of the space. This is supplemented by more passive recreational uses including decking, barbeque facilities and outdoor seating zones. Access is provided throughout this area by a pathway with seating rocks to activate the whole space.
- **Community Courtyard:** This courtyard fronts onto the western boundary to Karne Street North. The main feature within this courtyard is the retained Tree 6, which serves as the landmark tree ringed by a circuit pathway and groundcovers. Planting is provided to the northern, western and southern boundaries of the courtyard in shrubs and small trees, providing a green link to the public domain and providing shade to residents. A multi functional deck is provided to the east fronting the proposed building, creating areas for casual seating.
- **Landscaped terraces:** Each level has landscaped terraces with plants and shrubs in planter boxes.

The landscape scheme proposed across each level is illustrated in **Appendix E**. The Public Place Plan included in the Design Report at **Appendix B**, provides further detail on the wayfinding strategy throughout the landscaped areas.

Figure 24 Landscaped area photomontage

3.9 Stormwater Management

An Integrated Water Management Plan has been prepared by Henry & Hymas and is included at **Appendix T**. Stormwater is proposed to be managed via a 116m^3 on-site detention (OSD) tank in conjunction with pits and pipes, with the stormwater system to discharge into an existing kerb inlet pit located on Karne Street North. A drainage swale and retaining wall are proposed adjacent to the northern boundary to contain overland flows. The OSD tank is located near the southern portion of the site adjacent to the site boundary to the dog park. Pollution control pits have been

design to Council requirements and ocean guard pit baskets are provided in all inlet pits to treat stormwater. Further discussion is provided at **Section 6.12** and at **Appendix T**.

3.10 Waste Management

As detailed in the Operational Waste Management Plan at **Appendix V**, the proposal provides various areas allocated for waste storage and collection within the basement. These include:

- A 45m^2 waste storage room; and
- Two (2) garbage chute rooms 8m^2 and 6m^2 in area.

Waste is removed by a private contractor from the basement loading area at least twice a week.

The waste and bin requirements of the proposal are detailed in **Table 6** below and the waste areas are located in the basement as depicted in **Figure 25**.

Table 6 Required waste specifics

Bin Type	Bin size / capacity	Bin numbers	Pick up frequency (per week)
General waste	1,100 litres	5	2 times
Recycled waste	1,100 litres	2	2 times
Medical waste	120 litres	2	1 time
Cytotoxic waste	120 litres	2	1 time
Secured paper waste	240 litres	1	As volume dictates
Fluid waste	1265mm x 645mm bunded pallet	1	As volume dictates

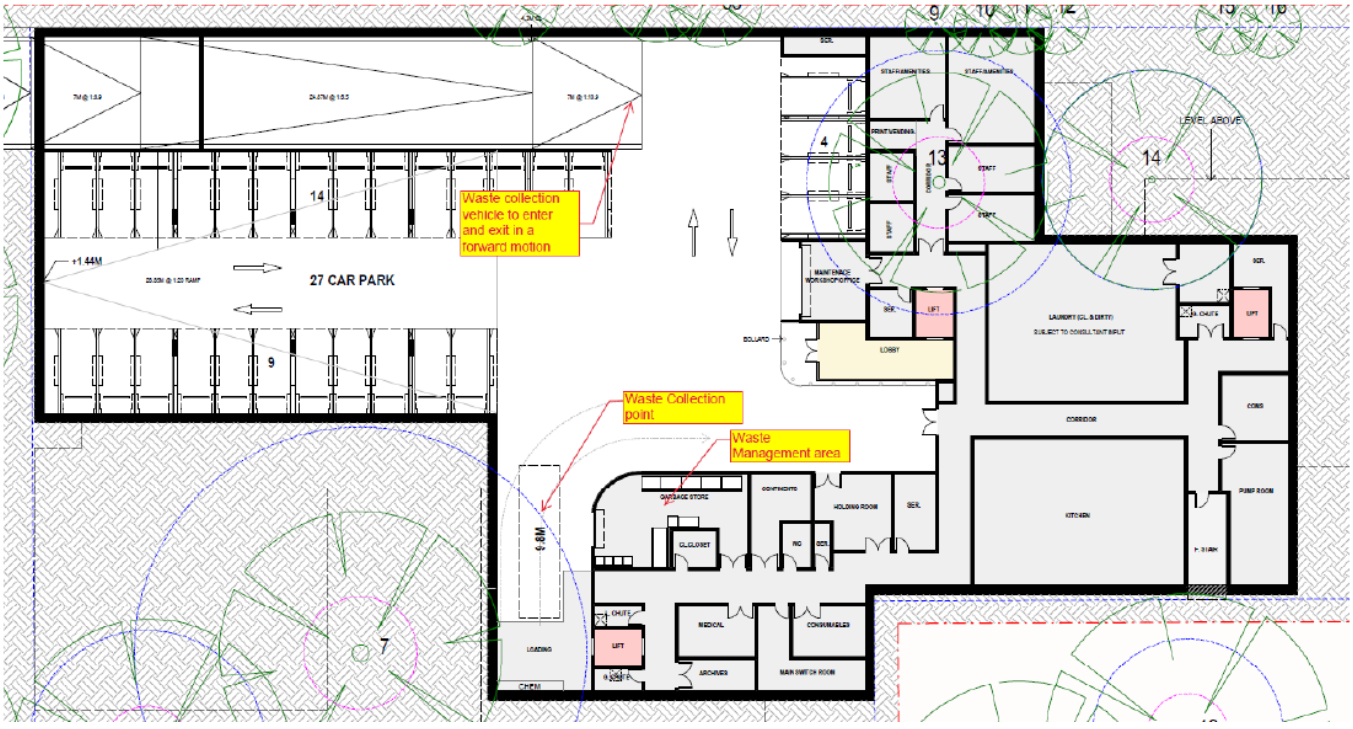


Figure 25 Waste areas

The waste room areas have been calculated based on equipment requirements, collection frequencies and bin dimensions with additional manoeuvrability area.

The cleaning and kitchen staff will be responsible for transportation of bins as required from their designated operational locations to the bin holding room. The building manager will assess the handling where possible. Further discussion is provided at **Appendix V** and **Section 6.15.2**.

3.11 Environmentally Sustainable Development

The proposed development has been designed taking into account Environmentally Sustainable Development (ESD) principles. JHA has prepared an ESD Report in **Appendix Q**, which sets out the various ESD initiatives that are being incorporated into the development and confirms that the proposed development meets the relevant energy and water reduction targets.

The following outlines a summary of the key ESD commitments that have been incorporated into the proposed development. The ESD objectives seek to encourage a balanced approach to designing new facilities for the project; to be resource-efficient, cost-effective in construction and operation; and to deliver enhanced sustainability benefits concerning impacts on the environment and well-being of residents, patients, staff, and visitors whilst providing the best possible facilities for a constructive environment.

- On-site 99kWp of solar PV system
- Passive solar design measures to reduce reliance on HVAC, including:
  - Performance glazing
  - Appropriate Insulation
  - Appropriate shades
  - Operable windows for natural ventilation
- Energy-efficient air-conditioning systems
- Energy-efficient LED lighting systems throughout
- Energy-efficient equipment
- Provision for low emission vehicles
- High WELS-rated water fixtures & fittings
- Water-efficient washing machines and dishwashers
- Rainwater capture and reuse for landscape irrigation
- Use of recycled materials, including:
  - Recycled road base below concrete slabs and pavements
  - Recycled aggregate for drainage layer behind retaining walls.

Further detail on the proposed sustainability measures are provided in the ESD Report at **Appendix Q**.

3.12 Construction Impacts

A detailed Construction Management Plan (CMP) will be prepared by the appointed contractor prior to the commencement of works. The CMP will address the following matters:

- Material management;
- Construction traffic management;
- Health and safety;
- Equipment / materials staging and parking;
- Dust control measures; and
- Methods for disposal of demolition waste.

4.0 Community Engagement

This chapter outlines the engagement undertaken and key issues raised by community and stakeholders describes consultation undertaken prior to the lodgement of the EIS for the redevelopment of the site. A Consultation Outcomes Report has been prepared by Ethos Urban and is included at **Appendix Y**.

The consultation activities reached local community members and Council. This outreach included delivering letter notifications to residents as well as a follow up postcard to the same group, Facebook notifications to the local residents community group, a detailed presentation accessible on the project website to discuss items relating to the planned proposal in a well-connected and convenient location.

4.1 Engagement carried out

4.1.1 Consultation Methods

Throughout the 6-week community engagement period, from **27 September to 11 November 2022**, the project team offered opportunities to find out about the project and provide feedback. **Table 7** summarises the communication tools employed to inform the community and stakeholders of these.

Table 7 Summary of community consultation methods

Tool	Description	Target Audience	Reach
Website	A dedicated space within the Opal Care website provided information about the project, planning process, engagement events, and how to contact and get involved. https://www.opalhealthcare.com.au/residential-aged-care/narwee-parklands	All	251
Frequently Asked Questions	Developed 9 FAQs for the project webpage, which explained key terms, and the planning, design and construction process.		
Stakeholder & Community Invite Letters	Initial letterbox drop on **27 September** to inform residents and stakeholders of the project and advertise the community webinar Additional postcard drop on **2 November** to point readers to the website for more information.	Residents, stakeholders and community groups in the catchment area	Approx. 1,304 letterboxes
Social media	A Facebook post on **13 October** to advertise rescheduled community webinar and drive more RSVPs.	Narwee Residents Group (Facebook)	3 likes, 1 comment
	A Facebook post on **2 November** to coincide with letterbox drop and point readers to additional information on project website.		2 likes
PowerPoint presentation slides	Detail the objectives, vision, and key deliverables of the site, created for the webinar and uploaded to the project website on **1 November**.	Key Stakeholders Community Webinar attendees	24

4.2 Summary of feedback received

This section provides a summary of the Council and community consultation undertaken to inform the SSDA.

4.2.1 State Design Review Panel

The below table summarises feedback received from the second State Design Review Panel meeting and the project response, as outlined in the Design Review Report in **Appendix C**.

Topic	Summary of feedback	Project response
Connecting with Country	**1.** Demonstrate the potential within the cultural mapping of the site and illustrate how this has informed the	**1.** The mapping could inform cultural outcomes including (but not limited to)

Topic	Summary of feedback	Project response
	site strategy, architectural and sustainability response. **2.** Consider how relationships with Aboriginal Knowledge Holders can extend throughout the life cycle of the completed project..	- A mapping within the yarning circle on the ground, orientating people to cultural flows and forces upon this Country - Story telling through signage - A pattern for etching on concrete paving **2.** Continued participation with Co-design activities throughout all stages of the design process - A smoking ceremony before the first sod of soil is turned. - Monitoring of any artifact or heritage items found during excavation - NAIDOC day activity on site - Continued NAIDOC day engagement during operation, such as a smoking ceremony, a welcome to Country by local elder - Engage elders to perform cultural workshops
Site strategy and landscape	**3.** The main site entry is dominated by driveways and ramps. Reconsider the northwestern interface to improve the arrival experience: a. Investigate the potential to switch the carpark ramp with the ground floor driveway, increasing deep soil provision. b. Increase the landscape buffer to the north of the driveway, to enhance the separation between the neighbouring dwellings and provide a better outlook for the ground floor apartments. c. Incorporate soft landscaping through to the port cochere to reduce the extent of hard pavement. **4.** Review the proximity of the elevated protected biodiversity zone, to the astern ground floor apartment, to ensure the apartment receives sufficient sunlight. **5.** Ensure deep soil zones have minimum dimensions of 6m (Housing SEPP, Section 107)	a. Switching the ramps and driveway have been investigated, however it is anticipated that ambulance and services vehicles will enter the basement carpark. The closed proximity of ramp will disturb the tranquillity and quietness of rooms, particularly at ground level. b. A 400mm landscape strip has been included between the 2 driveways to create green separation for trailing plants to grow on light-weight steel wire mesh. c. Planters with combination of vine/ cascading plants are proposed to the Porte Cochere to provide lush greenery and sense of arrival to the entry. Additional planting area and planting pots are proposed to the drop-off zone to reduce hard paving. **4.** The Eastern facade has been further set back from boundary fence line to allow greater depth for sunlight to cast into the resident rooms. **5.** Confirming deep soil zones calculation are taken from min. 6m dimensions.
Architecture	**6.** The architectural design principles presented at SDRP 1 demonstrated a fine grain articulation of the mass into smaller 'houses'. This has not translated into architectural form. Consider the following: a. Vertical separation of the individual blocks by varying storey heights to assist in defining the houses, rather than a continuous three storey monolithic form.	a. The fine grain articulation of mass is explored through 'clusters' of rooms, in lieu of storey heights for not to breach permissible heights. The residential clusters have been broken into smaller elements to articulate and reflect the existing local developments. b. Articulation of the roof is addressed through variation of façade / roof edge junction in lieu of roof forms itself. The variation of façade 'clusters' roof edge details subtlety articulate the elevations.

Topic	Summary of feedback	Project response
	b. Articulation of the roof forms to reference the surrounding pitched roof house typology. **7.** The site has four unique urban situations. Contextualise each façade and develop more individually site responsive solutions. **8.** The south facing balconies, whilst offering important outdoor space, provide little sunlight and are exposed to prevailing winds. Incorporate louvres and screening to enclose and protect these valuable spaces, akin to wintergardens. **9.** Several balconies can be overlooked from communal areas, review the privacy and quality of apartments which are located at internal corners and adjacent to common spaces. **10.** Staff amenities are still located in the basement, consider finding alternate locations above ground, with better access to sunlight.	**7.** Each façade treatment responds to the site and its four unique urban situations. • The Northern façade has been set back to allow for more privacy for the residents and neighbouring buildings. At Ground Level, the façade is predominantly tiled with face-brick to ground the building form. The set-back also enhance private open space from boundary. • Perforated screens and sliding panels have been introduced along the Southern elevations. The proposed screenings also address outlook onto motorway and adjacent public park. • The Western courtyard allows for the bedrooms windows to face away from Karne Street North. The balconies and terraces are more open to enable residents to enjoy the external area. • The Eastern façade has also been set back from the boundary fence line, to prevent neighbouring buildings from being overlooked. Vertical louvres have been introduced to upper levels to provide screenings. **8.** Perforated screens, louvres and sliding windows have been incorporated into the South facing facades. This will enclose and protect the balconies from prevailing wind and increase privacy from the park. **9.** Planter hedges have been proposed to screen off resident rooms at Ground Level. **10.** Proposed staff amenities remain in Basement to suit the operational needs of Opal HealthCare. A large skylight has been proposed to the staff room and staff can access an at grade outdoor space.

4.2.2 Council feedback

The below table summarises feedback from Council and the project response.

Topic	Summary of feedback	Project response
Streetscape and public domain interface	• Provide Karne Street elevation showing the relationship to the surrounding context and demonstrating appropriate bulk and scale. • Buffer the interface with the dog park.	• The proposal has been designed to address Karne Street North, with the vehicular and pedestrian access points facing the street. The built form has the communal landscaped area and bedroom windows facing the street which will allow natural surveillance to the street and public domain. • The proposal provides ground floor setbacks varying from 1.5-7m and upper floor setbacks to the north facing the neighbouring residential dwellings varying from 7-9.9m, ensuring that the built form steps away from the site boundary and is well separated from neighbouring development. A garden facing the north of the site and other landscaped area further recesses the building and

Topic	Summary of feedback	Project response
		provides articulation to the building façade which reduces the appearance of built form. • While a 3m setback to the battle-axe handle of the dog park is proposed, this area is narrow, intended to be used as access to the main dog park area and allows for benefits to landscaping and the public domain to be provided to the west and north of the site such as the retention of Tree 6. A reduced setback in this area avoids building bulk to be located on the interface of the main portion of the dog park. • Further, the development is situated to the south and west of residential dwellings which ensure that over 3 hours of sunlight is provided to the dwellings and private open spaces of neighbouring development. • A fence is proposed to the site boundary adjacent to the dog park.
Internal amenity	• Provide the furniture plan to demonstrate functional internal circulation. • Ensure internal areas comply with the requirements of the Disability (Access to Premises – Buildings) Standard and relevant BCA performance requirements. • Provide the proposed materials schedule and size of windows and openings. • Demonstrate cross ventilation, good solar orientation, and solar access in the plans.	• Indicative furniture is provided to demonstrate functional internal circulation within rooms and communal areas. • The Access and BCA Reports accompanying the application demonstrates that the proposal satisfies the requirements of the relevant Australian Standards and the BCA. • A materials schedule, cross ventilation plan and shadow diagrams are provided as part of the Design Report accompanying the application.
Architecture expression	• Recommended provision of roof articulation for visual interest. • Accommodate design requirements for physical ageing and dementia, including tonal contrasts between walls, floor junctions, doorways, benchtops and floors for legibility. • Include the port cochere roof in the elevations and demonstrate adequate ceiling heights.	• Roof articulation has been implemented in the design to provide visual interest, refer to the roof plan and elevations for further detail. • Internal design details including colours and tones of will be confirmed at detailed design stage. The Applicant welcomes these details to be provided as a condition of consent. • The elevations include the port cochere roof and the ceiling heights have adequate clearance for an ambulance. • The design has evolved through the SDRP process in response to its advice, including the introduction of a finer grain residential character. This is achieved through the reduction of building length and the breaking of residential clusters into smaller elements to articulate and reflect existing local development.
Traffic and assets	• Provide minimum 1m clearing at the dedicated parking spot for the ambulance.	• A clearing area of 1m around the ambulance bay is provided to facilitate the movement of patients and paramedics.

Topic	Summary of feedback	Project response
	• Provide an adequate turning path for the ambulance to drive in a forward direction to the port cochere and turn around and exit the site in a forward direction. • Preferred to install a mini roundabout in the shape of a circle or oval to streamline traffic. • Ensure adequate sight distance to pedestrians is kept clear at the exit of the driveway. • Reconstruct Karne Street North footpath to a minimum 5m. • Height clearance of the basement to allow for waste collection by Council's HRV truck • Provide bicycle parking and designate Accessible, Staff and Visitor car parks.	• An adequate turning path is provided in the porte cochere area to allow the ambulance to enter and exit in a forward direction. • Due to the constraints of the site, a mini roundabout is not able to be provided. Appropriate manoeuvring paths are provided in the driveway to enable front in and front out travel. • A 2m clearance is provided between the site boundary and the driveway separating wall. • The architectural plans depict the proposed works within the property boundary. The Karne St Street North footpath and vehicular crossing wing design requests can be addressed as a condition of consent. • The architectural plans include sections of the basement which are used to confirm appropriate height clearances. • Accessible, staff and visitor parking is designated in the basement. 5 bicycle spaces are provided adjacent to the porte-cochere.
Environmental management	• Arborist report and any other environmental assessments to be provided. • Consider a potential third layout option that retains trees 6 and 7. • Vegetation on the Biodiversity Values Map is significant and must be retained and protected, with no encroachment to the tree protection zone. • A surcharge pit draining water onto Council land is not supported. • Tree planting to reflect prevailing species and the Castlereagh Ironbark Forest Ecological Community.	• An Arborist Report and other environmental management documentation have been provided as part of this application. • Tree 6 has been retained as part of this application, with tree protection zones and other measures provided to retain this tree. • No built form encroachment to the biodiversity values area is made. • The design of the stormwater system does not involve drainage onto Council land. • Tree species including the quantity and size are detailed on the Landscape Plans. An ironbark garden is proposed to form part of the landscaped garden to the south west of the site overlooking the dog park.
Waste management, waste and recycling	• Waste Management Plan to be submitted, including increasing resource recovery of waste material, reduce waste to landfill, and costs related to disposal. • Facilities will also be needed for collecting paper/cardboard for recycling, separate food waste, and clinical waste. • Calculate the estimated weekly generation of waste as per Table F3 of the NSW EPA's 'Better practise guide for resource recovery in residential developments' 2019. • Commercial waste and recycling services to be organised through a private contractor.	• An operational WMP is submitted with this application. • Table F3 from the NSW EPA's 'Better practise guide for resource recovery in residential developments' 2019 has been utilised in the Waste Management Plan (WMP). • Commercial waste and recycling will be collected and managed by a private waste contractor. • The WMP confirms that a bin storage area of 45m2 is to be provided. A garbage storage area of 45m2 is provided in the basement with access to the loading area. • The proposal is capable of meeting the nominated design considerations. • A waste holding room 20m2 in size can be utilised to hold and store bulky waste items for collection.

Topic	Summary of feedback	Project response
	• Bin storage room to be a sufficient size and reflect Council's design considerations. • Provide a storage room/s to store bulky waste items waiting for collection. • Waste chutes to be used for waste and not recycling, and to terminate directly to bins in the bin room. • Basement height clearance and turning room to provide for Council's waste collection HRV truck. • Sweep path analysis to confirm a service vehicle can enter and exit the site in a forward direction. • Minimum headroom as determined in AS2890.2 Parking Facilities: Off-Street Commercial Vehicle afforded in plans.	• The garbage chute rooms are capable of accommodating 240L bins. • The WMP notes that all general waste will be transferred manually by Opal home cleaning staff to the waste holding area on an as required basis. • Chute and chute room details terminating at bins are shown in the architectural plans accompanying this application. • A 10m long rigid truck can enter and exit the basement in a forward direction as demonstrated by the swept path analysis in the Transport Impact Assessment. • A swept path analysis forms part of the traffic impact assessment forming part of this application. • The proposal is compliant with the relevant Australian Standards, including that of minimum headroom in AS2890.2.
Flood management	• Consider management of residual flood hazard to ensure residents' safety. • Undertake a Flood Impact and Risk Assessment. • On-site Detention Basin requested in accordance with Council's DCP. • Consider installation of a drainage pipe and creation of an accompanying drainage easement along the northern boundary.	• A Flood Impact Assessment (refer to **Appendix CC**) accompanies this application which addresses these matters raised. All finished floor levels are compliant with the development controls specified in Part B, Section B5 of former Canterbury Council's Development Control Plan 2012- Catchments Affected by Stormwater Flooding.
Water sensitive urban design (WSUD) and stormwater management	• Implement WSUD principles where practicable, including passive irrigation from stormwater. • Recommended using recycled water for toilet flushing, car washing, clothes washing, irrigation etc. • Provide further information and detailed stormwater management options for assessment. • Confirm existing Council stormwater systems through field survey. • Assess discharge from site to ensure no adverse impact to Council's stormwater system.	• Matters relating to water efficient fittings and fixtures, rainwater harvesting and WSUD are discussed in the civil report accompanying the application.
Other comments	• Demonstrate implementing technology or systems to reduce energy demand.	• An ESD Report outlining the proposal's response to energy usage is provided as part of this application.

4.2.3 Community feedback

The project team offered multiple opportunities for information and feedback over the 6-week engagement period, despite this the local community expressed limited interest in the project and no feedback was provided. This is outlined in the Consultation Outcomes Report in **Appendix Y**.

One enquiry sought further detailed information about the project, as outlined below.

Question	Response provided
What is the proposed height for each of these buildings?	Whilst the overall maximum building height limit for the site is 9.5m, the north-eastern corner of the site is proposed to be the same at 9.5m / 3 storeys. The development floor plates are on consistent levels
What are the respective setbacks from the northern boundary?	At its closest point, the building is setback 3m from the northern boundary.
Are windows and/or verandas proposed to be incorporated in the north-facing walls?	Rooms along this boundary will be oriented east-west to reduce potential overlooking. Terraces are proposed for Level 1 with a 7.4m setback from the boundary with appropriate landscaping and tree retention to ensure continued amenity and privacy for surrounding neighbours.
What is the proposed location of mechanical plant?	This is proposed to sit within the northern and north-eastern portion of the site and will be limited to no more than 20% of the surface area of the roof, with a maximum height of 11.5m. The design will be appropriately selected to ensure there are no adverse noise or amenity impacts to surrounding neighbours.
"Detailed shadow and visual impact statements have been undertaken to ensure the proposal responds to the adjoining properties and public open space" How will the proposed building heights meet the objectives of this statement?	The team has worked a series of design iterations, incorporating valuable feedback received from local Council and the State Design Review Panel to ensure the proposal is appropriate and responds sensitively to the surrounding streetscape and is in keeping with the local Narwee character. Specifically, the proposed design has sought to retain existing mature trees on site and maintain the streetscape character and amenity to properties along the northern and eastern boundaries. Further information on this process including the detailed overshadowing studies as well as the visual impact statement will be available when the proposal is publicly exhibited by the Department of Planning and Environment in the coming months.

4.3 Engagement to be carried out

The project team are committed to ongoing community consultation following the submission of the EIS. This includes during the exhibition and assessment of the project and following a determination.

Following its submission, DPE will exhibit the EIS on the Major Projects NSW Website and invite submissions from government agencies and the public. Once the exhibition period is complete, DPE may require the Proponent to prepare a Submissions Report in response to issues raised. The project team will continue to liaise with DPE and stakeholders during the Project's assessment to address queries that may arise.

5.0 Statutory Context

The project's key statutory requirements are outlined in the sections below. This section is complemented by a statutory compliance table at **Attachment B** that identifies all statutory requirements and where those requirements have been addressed in the EIS.

5.1 Land Use Definition

The project is defined as 'seniors housing' under the CLEP 2012, consistent with the Standard Instrument. Specifically, the proposal seeks consent for the provision of a 'residential care facility', which is included in the definition of seniors housing and defined as follows:

> ***residential care facility*** *means accommodation for seniors or people with a disability that includes—*
>
> *(a) meals and cleaning services, and*
> *(b) personal care or nursing care, or both, and*
> *(c) appropriate staffing, furniture, furnishings and equipment for the provision of that accommodation and care,*
> *but does not include a dwelling, hostel, hospital or psychiatric facility.*
>
> ***Note****—*
> *Residential care facilities are a type of seniors housing—see the definition of that term in this Dictionary.*

5.2 Permissibility

The site is zoned R3 Medium Density Residential under the CLEP 2012. Seniors housing are permissible with consent within the zone under CLEP 2012. Further, Part 5 Seniors Housing of the Housing SEPP applies to the site.

A portion of the site is 'environmentally sensitive land' identified in Schedule 3 of the Housing SEPP, being land identified on the Biodiversity Values Map within the meaning of Section 7.3 of the *Biodiversity Conservation Regulation 2017*. The portion of the Site which is 'environmentally sensitive land' under Schedule 3 of the Housing SEPP is identified in **Figure 26** below.

The area identified on the Biodiversity Values Map (not being the entirety of the site) is excluded from the operation Part 5 of the Housing SEPP under section 80(1)(b). Therefore, development located on the south eastern portion of the site within the area shaded purple cannot be 'carried out under' the Housing SEPP and is subject to the controls in the CLEP 2012. As discussed above, development for the purposes of seniors housing is permissible in the R3 zone under the CLEP 2012.

Figure 26 CLEP 2012 land use zone with biodiversity overlay

5.3 Power to grant consent

5.3.1 Declaration of State Significant Development

Development consent will be sought under 'Division 4.7 – Stage Significant Development' of the EP&A Act.

Section 4.36(2) of the EP&A Act states that:

> *A State environmental planning policy may declare any development, or any class or description of development, to be State Significant Development.*

Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 lists development that is declared State Significant Development. Schedule 1, Clause 28 states:

> *Development for the purposes of seniors housing if—*
>
> *(a) the seniors housing component has a capital investment value of—*
>
> ***(i) for development on land in the Greater Sydney region—more than $30 million, or***
>
> *(ii) otherwise—more than $20 million, and*
>
> ***(b) the seniors housing component includes a residential care facility; and***
>
> *(c) other components of the proposed development are not prohibited on the land under an environmental planning instrument.*

As the project is for the purpose of seniors housing with a CIV of more than $30 million and includes a residential care facility, it is declared State Significant Development.

5.3.2 Consent Authority

Section 4.5 of the EP&A Act and Section 2.7 of the State Environmental Planning Policy (Planning Systems) 2021 stipulates that the consent authority is the Minister for Planning (or the DPE as their delegate) unless the development triggers the matter set out in Section 2.7(1) in which case the consent authority will be in the Independent Planning Commission.

5.4 Other Approvals

The following section outlines other legislative approvals required for the Project in addition to a development consent under Division 4.7 of the EP&A Act.

5.4.1 Consistent Approvals

Section 4.42 of the EP&A Act stipulates that certain authorisations cannot be refused if they are necessary for carrying out State Significant Development. **Table 8** lists legislative approvals that are required for the Project and cannot be refused if the Project is approved.

Table 8 Consistent Approvals under Section 4.42 of the EP&A Act

Act	Approval Required
Legislation that must be applied consistently	
Fisheries Management Act 1994	No
Mine Subsidence Compensation Act 1961	No
Mining Act 1992	No
Petroleum (Onshore) Act 1991	No
Protection of the Environment Operations Act 1997	No
Roads Act 1993	No
Pipelines Act 1967	No

5.4.2 Environmental Protection and Biodiversity Act 1999 Approval

The *Environmental Protection and Biodiversity Act 1999* (EPBC Act) provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities, and heritage places. These are known as matters of National Environmental Significance. If the proposed development will, or is likely, to impact a matter of National Environmental Significance (MNES), then it is required to be referred to the Federal Department of the Environment for assessment to determine if it constitutes a 'controlled action' requiring EPBC approval. Presently, a bilateral agreement allows the Commonwealth Minister for the Environment to rely on the NSW environmental assessment process when accessing a controlled action under the EPBC Act.

The project is not likely to impact any MNES or otherwise have a significant impact on the environment. Therefore, the project is not required to be referred to the Federal Department of the Environment to determine if it constitutes a controlled action and the bilateral agreement applies.

As detailed at **Appendix G**, a BDAR Waiver was issued on 8 November 2022 in accordance with section 7.9(2) of the *Biodiversity Conservation Act 2016*.

5.4.3 Approvals not required for State Significant Development

Section 4.41 of the EP&A Act stipulates those certain authorisations are not required for State Significant development. As shown in **Table 9**, the following legislative approvals would otherwise be required if the Project was not State Significant.

Table 9 Legislation that does not apply

Legislation	Approval Otherwise Required
Legislation that does not apply to State Significant Development	
Fisheries Management Act 1994	No
Heritage Act 1977	No
National Parks and Wildlife Act 1974	No
Rural Fires Act 1997	No
Water Management Act 2000	No

5.5 Pre-Conditions to Exercising the Power to Grant Consent

Table 10 identifies pre-conditions to be fulfilled by the consent authority before exercising their power to grant development consent.

Table 10 Pre-Conditions to be fulfilled by the consent authority

Legislation	Pre-Condition
Biodiversity Conservation Act 2016 (BC Act)	In accordance with this Section 7.9 of the BC Act, an assessment of any State Significant proposal's biodiversity impacts must be undertaken as part of the provision of any SSDA, including the provision of a Biodiversity Development Assessment Report (BDAR) in instances where it is required. The proposed development has been assessed by Travers Bushfire and Ecology who have prepared a BDAR Waiver in **Appendix G**. A portion of the south eastern corner of the site contains land mapped under the Biodiversity Values Map (BV Map). Some large, apparently remnant, Eucalyptus tereticornis are located in the neighbouring lot overhang the eastern boundary. These trees are mapped by the Sydney Metropolitan Vegetation Mapping as PCT 725. These trees are highly modified with no native understorey and will not be adversely impacted by the proposal. The proposed development has been designed to avoid both the overhanging trees and the mapped BV land. Otherwise, all existing vegetation within the site is highly disturbed and has no potential for threatened flora species. No threatened species were recorded or are expected to occur within the subject land. Potential habitat for threatened species is limited to a single small hollow and very minor seasonal foraging habitat for nectarivorous species. These habitat features are unlikely to be of importance for any threatened fauna species. The proposal will not cause a significant impact on biodiversity values including threatened species. As such, a BDAR Waiver was issued on 8 November 2022 in accordance with section 7.9(2) of the *Biodiversity Conservation Act 2016* (refer to **Appendix G**).
State Environmental Planning Policy (Transport and Infrastructure) 2021	The *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure of the State. Section 2.48 requires the consent authority to give written notice to the electricity supply authority for the area and take into consideration any response to that notice before granting consent to a development likely to affect an electricity transmission or distribution network. The operations of the new RCF will require electrical power requirements and therefore, the proposal provides a dedicated substation. The substation will be sized to service the development. All works will be coordinated with all authorities to avoid any delays in future works.
State Environmental Planning Policy (Industry and Employment) 2021	Chapter 3 of the *State Environmental Planning Policy (Industry and Employment) 2021* (I&E SEPP) sets out planning controls for advertising and signage in NSW. Section 3.6 stipulates that a consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied that: • The signage is consistent with the objectives of Chapter 3 of the SEPP; and • The signage satisfies the assessment criteria specified in Schedule 5 of the SEPP. An assessment against the relevant provisions of the I&E SEPP is included below in **Section 5.6.2.**
State Environmental Planning Policy (Resilience and Hazards) 2021	The *State Environmental Planning Policy (Resilience and Hazards) 2021* (R&H SEPP) aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment. Section 4.6 stipulates that a consent authority must not consent to the carrying out of development unless: • It has considered whether the land is contaminated, and 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 • If the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is suitable that the land will be remediated before the land is used for that purpose.

Legislation	Pre-Condition
	The Phase 2 Detailed Site Investigation and Remediation Action Plan prepared by Geotechnique confirms that the site can be made suitable for the proposed development and use as a seniors housing development. Refer to **Appendix U** and **Section 6.14** of this EIS.

5.6 Mandatory Matters for Consideration

Table 11 identifies matters that the consent authority is required to consider in deciding whether to grant consent to any development application.

Table 11 Matters for Consideration

Legislation	Matters for Consideration
Environmental Planning & Assessment Act 1979 (EP&A Act)	The proposed development is consistent with the objects of the EP&A Act for the following reasons: • It allows for the orderly economic development of the land for seniors living and provides improved housing and health care infrastructure that can implement contemporary models of care. • It allows for additional employment opportunities throughout the construction and operation phases. • It will facilitate ecologically sustainable development. • It achieves a high-quality design outcome that will benefit residents, staff and visitors. • The proposed development is consistent with Division 4.7 of the EP&A Act, particularly for the following reasons: - The development has been declared to have state significance; - The development is not prohibited by an environmental planning instrument; and - The development has been evaluated and assessed against the relevant heads of consideration under Section 4.15(1), as outlined in this table.
State Environmental Planning Policy (Housing) 2021	The site is zoned R3 Medium Density Residential and the Housing SEPP applies. An assessment of the proposal's consistency with the Housing SEPP is provided at **Section 5.6.1**.
State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004	The ESD report in **Appendix Q** details the ESD commitments of the proposal. The building façade and floor plans have been designed with the vision to give occupants optimal passive heating and passive cooling and solar energy will be utilised through the provision of PV panels on the roof. When combined with other engergy efficient strategies, this will lead to lower energy demands and therefore lower greenhouse gas emissions.
State Environmental Planning Policy (Biodiversity and Conservation) 2021	The proposed development includes an area identified on the Biodiversity Values Map as an ecological significant area. The proposed building envelope has been designed to retain significant trees where possible, avoid the BV mapped area and have acceptable impacts on biodiversity, ecology and the surrounding environment. The proposed stormwater and water quality as well as landscaping scheme have considered the biodiversity of the site and its surrounding. The site is not located within a close distance of the foreshore, and therefore, it is not anticipated that the development will have any impacts on access to the waterfront or foreshore access.
Canterbury Local Environmental Plan 2012 — Clause 2.3 Zone Objectives and Land Use Table	The site is zoned R3 Medium Density Residential. Development for the purposes of seniors housing is permissible in the R3 zone. The proposal is consistent with the zone objectives as: • The proposal is for seniors housing in the form of a RCF that will allow for existing and future senior residents to age in place with services and facilities on site to meet the housing needs of the community; • The proposal will increase the diversity of housing typologies in Narwee in a manner consistent with the existing and future residential character of the area; and • The proposal enables seniors housing which has a number of services and facilities provided on site to meet the day to day recreational, social and spiritual needs of its residents. The proposal does not preclude the ability of neighbouring sites including the Richard Podmore Dog Park or Bennett Park to continue its existing recreational function.

Legislation		Matters for Consideration
	Clause 4.3 Height Clause 4.6 – Exceptions to development standards	The site is afforded a maximum building height of 8.5m. Pursuant to the Housing SEPP, the site benefits from a maximum permissible height of 9.5m. Overall, a majority of the proposal complies with the maximum building height with minor variations in localised areas in the southern portion of the site where the proposal seeks a variation of 1.1m to the 9.5m building height. The proposed development is supported by a clause 4.6 variation request to the height of buildings development standard under section 84(2)(c) of the Housing SEPP. Further discussion is provided in **Section 6.1.2** and at **Appendix BB**.
	Clause 4.4 Floor Space Ratio	The maximum FSR under the CLEP 2012 is 0.5:1. However, pursuant to the Housing SEPP the site benefits from a maximum FSR of 1:1 non-discretionary standard. The proposed development seeks consent for a maximum FSR of 1:1 in accordance with the Housing SEPP.
	Clause 5.10 Heritage	The site is not heritage listed nor is it located in a heritage conservation area and is not located in close proximity to these heritage features. No further assessment is required.
	Clause 5.21 Flood Planning	A Flood Impact Assessment has been prepared and is included at **Appendix CC**. The site is not affected by the overland flows from Grove Avenue, however, overland flows from private properties enter the site from the northern boundary and traverse towards the southern boundary, discharging to Richard Podmore Dog Park. The peak flow entering from the northern site boundary is up to 190 m^3/s in the 1%AEP event. The flow rate within the site along the northern boundary is circa 1.8m^3/s during the PMF event. The proposed development will include inground drainage pit and pipe systems along the northern boundary which will discharge to an existing pipe along Karne Street North. This is accompanied by a drainage swale and retaining wall near the northern boundary to control overland flows. This system will ensure the site is flood free during both the 1% AEP and PMF events and overland flow from the northern site boundary will be redirected to Karne Street North. Further discussion is provided at **Section 6.12**.
	Clause 6.4 Biodiversity Protection	The proposed development has been assessed by Travers bushfire and ecology who have prepared a BDAR Waiver in **Appendix G.** A portion of the south eastern corner of the site contains land mapped under the Biodiversity Values Map (BV Map). Some large, apparently remnant, Eucalyptus tereticornis are located in the neighbouring lot overhang the eastern boundary. The proposed development has been designed to avoid both the overhanging trees and the mapped BV land. Otherwise, all existing vegetation within the site is highly disturbed and has no potential for threatened flora species. No threatened species were recorded or are expected to occur within the subject land. Potential habitat for threatened species is limited to a single small hollow and very minor seasonal foraging habitat for nectarivorous species. These habitat features are unlikely to be of importance for any threatened fauna species. The proposal has been designed to have minimal impact on biodiversity, ecology and the environment. The proposed stormwater and water quality design as well as landscaping scheme has had regard to the biodiversity values so as to ensure appropriate management and mitigation of any environmental impacts.
	Clause 6.1 Acid Sulfate Soils	The site is not affected by acid sulfate soils and the site is not located in close proximity to any land identified as class 1, 2, 3 or 4. No further assessment is required.
	Clause 6.2 Earthworks	The proposal involves cut to a depth of 6.5m. The Geotechnical Assessment in **Appendix R** demonstrates that the site is suitable for the proposed earthworks and that no adverse impacts to the site and surrounds will result.
	Clause 6.4 Stormwater Management	The proposal is accompanied by civil plans in **Appendix AA** which outline the stormwater management processes on site.
	Clause 6.6 Essential Services	Refer to **Section 6.19** for a detailed assessment of the infrastructure requirements of the proposal.

Legislation	Matters for Consideration
Canterbury Development Control Plan 2012	It is noted that development control plans are not a matter for consideration in the assessment of SSDAs by virtue of Clause 2.10 of the Planning Systems SEPP, which states that *'Development Control Plans...do not apply to...State significant development'*. Notwithstanding this, the relevant provisions of the CDCP 2012 have been assessed against the proposal in **Appendix DD**.

5.6.1 State Environmental Planning Policy (Housing) 2021

The *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) sets the standards for the development of seniors housing in NSW.

The proposed development is made pursuant to the Housing SEPP (excluding the area identified on the Biodiversity Values Map). The proposed development for the purposes of seniors housing is permissible with consent in the R3 zone.

The key provisions of the Housing SEPP have been considered in the preparation of the SSDA and are addressed below in **Table 12**.

Table 12 Assessment under the Housing SEPP

Clause		Controls
Division 1 Land to which Part applies		
Section 79 – Land to which Part applies		The site is is zoned R3 Medium Density Residential and therefore the Housing SEPP applies.
Section 80 – Land to which Part does not apply – general		A portion of the Site is 'environmentally sensitive land' identified in Schedule 3 Housing SEPP, being land identified on the Biodiversity Values Map within the meaning of section 7.3 of the Biodiversity Conservation Regulation 2017. The identification of land on the Biodiversity Values Map does not preclude development on this land pursuant to the CLEP 2012 as seniors housing is permissible in the R3 Medium Density Residential zone. It is noted the area identified as environmentally sensitive is limited to 82m^2 and will not be included in site area calculations for matters relating to the Housing SEPP. In any case, no built form is located in this area and it is noted that the trees are located on a neighbouring lot, with only the overhanging branches located within the lot. The BV mapped area will not be adversely impacted by the proposal. Further discussion is provided in **Section 6.1.5**.
Section 81 – Seniors housing permitted with consent		The Housing SEPP applies to the majority of the site. Where the Biodiversity Values Map applies, the proposed development is made permissible under the CLEP 2012.
Division 3 Development Standards		
Section 84 – Development standards general	(1) This section applies to development for the purposes of seniors housing involving the erection of a building.	The proposed development is for the purposes of seniors housing involving the erection of a building.
	(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 1,000m2, and (b) the frontage of the site area of the development is at least I for development on land in a residential zone where residential flat	The site has an area greater than 1000m^2 and has a street frontage of 74m to Karnes Street North. Residential flat buildings are not permitted in the R3 Medium Density Residential zone and therefore subclause (3) applies. The proposal has a maximum height of 10.6m along its southern elevation which exceeds the 9.5m height standard by 1.1m (11.6%). While the proposed development results in a variation to the maximum building height control, it is considered to be complementary to the character of neighbouring development and satisfies the objectives of the standard and the zone. A Clause 4.6 variation request is provided in **Appendix BB**. The proposal results in a building with three (3) storeys and a small portion of the southern elevation of the proposal varies the 45 degree setback to the third storey. As a result of the unique shape of the site and topographical change, the proposal has sought to protect the side and rear amenity of properties facing

Clause		Controls
	buildings are not permitted— (i) the development will not result in a building with a height of more than 9.5m, excluding servicing equipment on the roof of the building, and (ii) if the roof of the building contains servicing equipment resulting in the building having a height of more than 9.5m—the servicing equipment complies with subsection (3), and (iii) if the development results in a building with more than 2 storeys—the additional storeys are set back within planes that project at an angle of 45 degrees inwards from all side and rear boundaries of the site.	Karne Street North and Grove Avenue. It is noted that section 84 of the Housing SEPP contemplates an additional 2m of building height above the 9.5m building height development standard for servicing equipment where it is limited to 20% of the surface area of the roof. The proposed servicing equipment entirely complies with this development standard. While the proposal results in a non-compliance at the southern interface, it is considered that any resultant environmental amenity impacts have been appropriately managed so as to retain amenity for both public and private space and strict compliance with the development standard would result in the deletion of an entire hosuehold (15 RCF beds) and therefore, the proposal would not assist in meeting the forecast demand for aged living in the CIty of Canterbury Bankstown LGA or wider catchment area by 2026, with the undersupply increasing by 2031. This propsoed variation is further discussed in the Clause 4.6 variation request provided at **Appendix BB**.
	(3) The servicing equipment must— (a) be fully integrated into the design of the roof or contained and suitably screened from view from public places, and (b) be limited to an area of no more than 20% of the surface area of the roof, aI(c) not result in the building having a height of more than 11.5m.	The Architectural Design Report in **Appendix B** includes a height plane diagram demonstrating that all servicing equipment is located under the 11.5m limit.
Section 88 – Restrictions on occupation of seniors housing		The proposed development is for seniors housing in the form of a RCF. The proposal will comprise seniors 60 years and older. A restriction in this regard will be required on the Title via a condition of consent.
Section 91 – Fire sprinkler systems in residential care faiclities		The proposed RCF will be fitted with a fire sprinkler system.
Division 4 Site-related Requirements		
Section 94 Location and access to faiclities and services – residential care facilities	(1) Development consent must not be granted for development for the purposes of a residential care facility unless the consent authority is satisfied that residents of the facility will have	In addtion to a private bus service which will take residents to nearby centres with necessary services and facilities, on site services will include a café, salon, a wellness centre, community garden and home care services.

Clause		Controls
	access to facilities and services— (a) on-site, or (b) by a transport service other than a passenger service.	
Section 95 Water and sewer		An Infrastructure Management Statement is included at **Appendix O** which indicates that the proposal is capable of augmenting existing services.
Section 96 Bushfire prone land		The site is not identified as bushfire prone land.
Division 5 Design requirements		
Section 98 Design of senior housing		The proposed development has been designed with regard to Division 6 as discussed below.
Division 6 Design principles		
Section 99 Neighbourhood amenity and streetscape	(a) recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, and	As detailed in the Design Report at **Appendix B**, the RCF has been designed to suit the operational and functional needs of the Opal service offering and relevant standards for RCFs. Residents are housed in shared 'households' comprising 15 beds each, across a continuous, consistent flat level. The RCF includes a central back of house commercial kitchen and laundry on the basement level and neighbourhoods including dining, seating and lounge area on the ground and upper floors. The ground floor also contains the single main front entry and with front of house services with reception, offices, theatre, sl, cafe and a wellness centre. Given the site orientation and the location of existing trees, neighbouring residential dwellings and recreational space, it was determined that the proposed layout represents the optimal location for the RCF. Back of house and front of house services are located on basement and ground levels, with 15 bed households located on ground and upper levels. This location, in providing a large site under a single landholding, is therefore suitable for the functional and operational requirements that influence the deisgn and building footprint of RCFs, while allowing appropriate outlook and amenity to the ecological area and public domain neighbouring the site.
	(b) recognise the desirable elements of— (i) the location's current character, or (ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area, and	The desirable elements of the existing character of the site has been considered as part of the site analysis informing the design of the proposal. The proposed design is in accordance with the R3 zone objectives, desirable elements of the locations character and more specifically the interface of the site between recreational land to the south and residential land to the north. The proposal retains significant vegetation along the southern and western boundaries so as to provide an appropriate interface with the lower density development to the south. Likewise the materiality and architectural expression of the built form appropriately integrates with the surrounding area and provides a built form that is representative of the existing and future character of thelea.
	(c) complement heritage conservation areas and heritage items in the area, and	The site is not listed as a heritage item nor is it located in a heritage conservation area.
	(d) maintain reasonable neighbourhood amenity and appropriate residential character by—	The proposal adopts the following setbacks: • 6m from the western boundary • 7m from the northern boundary • 7.9m from the northern portion of the eastern boundary • 9.2m from southern portion of the eastern boundary • 3m from the southern boundary

Clause		Controls
	(i) providing building setbacks to reduce bulk and overshadowing, and (ii) using building form and siting that relates to the site's la, and (j) (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and	The proposed setbacks have been incorporated to provide appropriate internal and external amenity to all reisdents and neighbouring properties. The setbacks and building design are the result of substantial testing with the architect and have taken into account the comments made by Council and the SDRP. Overshadowing analysis has been prepared by Group GSA and is included at **Appendix B**. The analysis illustrates that the proposal will not result in adverse amenity impacts within the site or to adjoining development as the site is located to the south and west of adjoining residential development. Importantly, all adjoining properties will continue to receive in excess of 3 hours solar access during the winter solstice. Building form within the site has been estbalished so as to provide appropriate internal and external amenity for all residents. The building height has been estbalished with regard to clause 84 of the Housing SEPP and follows the topography of the site. The RCF rooms have been appropriately oriented so as to avoid any overlooking to adjoining residents to the north, while maximising outlooks to open space and solar access. Further discussion is provided in **Section 6.1.2**.
	(e) set back the front building on the site generally in line with the existing building line, and	The building maintains a 6m front setback which is in line with the existing building line to dwellings to the north.
	(f) include plants reasonably similar to other plants in the street, and	The proposed landscape scheme seeks to retain existing mature trees where possible to the northern and western boundaries of the site. Tree 6, a tree with medium retention value, is retained and features prominently within the proposed western courtyard. Substantial additional landscaped areas and planting are provided within a landscaped garden setting throughout. Specifically, the proposal will include seasonal planting, native plants and sensory planting throughout the site for the natural amenity of residents. Refer to the Urban Design Report and Landscape Plans at **Appendix B** and **Appendix E**, respectively.
	(g) retain, wherever reasonable, significant trees, and	As detailed in the Arboricultural Imapct Report at **Appendix F**, the proposal seeks to retain majority of the trees along Karne Street North. The proposal will not affect any trees identified as part of the ecological area on the south eastern boundary. It will also increase the existing tree canopy across the site as the eastern portion of the site is mostly cleared.
	(h) prevent the construction of a building in a riparian zone.	The site does not comprise a riparian zone. While a portion of the site is identified on the Biodviersity Values Map, the proposal seeks to retain all of the existing trees within this zone. An assessment has been undertaken by Cumberland Ecology and is included at **Appendix G.**
Section 100 Visual and acoustic privacy		The site adjoins residential dwellings to the north and as such, the orientation and design of windows and balconies has been carefully considered in the design of the proposed development. Balconies face away from the northern boundary where possible, and a minimum 7.9m separation is provided to the eastern upper floor balconies to residential dwellings to the east of the site. The northern terraces are located 8.9m from the northern boundary. This is further supplemented by the inclusion of substantial landscaping that ensures an appropriate buffer to adjoining residential development. Screening to habitable rooms will be fitted to provide appropriate visual amelioration in order to mitigate overlooking to adjoining development. In particular the substantial area of deep soil on the eastern portion of the northern boundary and the eastern boundary will provide a physical buffer between the site and residential dwellings adjoining the site to the north and east.

Clause		Controls
		Given the existing irregular configuration and aspect of the site being located within an urban environment, the positioning of rooms away from driveways and car parking areas is unavoidable. However, it is noted that rooms will be acoustically treated to ensure any noise impacts from the driveway or other sources can be avoided.
Section 101 Solar access and design for climate		The proposed development has been designed to maximise solar access internally for all habitable rooms, adjoining development and open space. Importantly, the proposed development has been configured to provide courtyard areas and terrace areas receive adequate sunlight during the winter solstice as detailed in the Design Report at **Appendix B**. Through the incorporation of generous setbacks and responding to the northerly aspect of the site the proposed development provides to the east, west and south this ensures that overshadowing is minimised to adjoining properties, where in excess of 3 hours of solar access is maintained to living areas and private open spaces between 9am and 3pm on 21 June.
Section 102 Stormwater		The proposed development will incorporate different stormwater measures to minimise disturbance and impacts of runoff to adjoining properties as shown on the Civil and Stormwater Plans at **Appendix AA**.
Section 103 Crime prevention		The proposed development aims to enhance natural surveillance to the surrounding area, and increase activity along Karne Street North and to the Richard Podmore Dog Park to the south. It will aim to minimise overlooking onto adjoining properties by including landscaped setbacks. The proposed seniors housing development will be designed to include secure entry points for residents and staff. Further discussion is provided in the Crime Prevention through Environmental Design Report at **Appendix Z**.
Section 104 Accessibility		The proposed development will include upgraded and new pedestrian paths to the site to ensure residents have a safe and accessible path of travel. The proposed development provides distinct separated pedestrian and vehicular access points, improving safety across the site. The entry lobby to the proposed development has been appropriately delineated through landscaping, driveway design and footpaths.Primary vehicular access will be provided off Karne Street North. The proposed access arrangements are discussed in **Appendix N**.
Section 105 Waste Management		Dedicated waste management rooms and facilities have been incorporated within the proposed development. Further discussion is provided in the OWMP at **Appendix V**.
Division 7 Non discretionary development standards		
Section 106 Interrelationship of division with design principles in Dvision 6		Adequate consideration has been given to the principles set out in Division 6 as discussed above.
Section 107 Non-discretionary development standards for hostels and residential care facilities—the Act, s 4.15	(2) The following are non-discretionary development standards in relation to development for the purposes of hostels or residential care facilities— (a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building,	Clause 84 permits a maximum building height of 9.5m. Given the topographical change across the site the propsoed development results in a 1.1m variation to the maximum building height development standard. Accordingly, a clause 4.6 variation request has been prepared for to vary the maximum building height and is included at **Appendix BB**. Further, the proposed development has had regard to the servicing requirements for the operation of the facility and the relevant controls purusant to section 107. Accordingly, the servicing equipment on the roof plan has been limited to 20% of the total area and does not exceed 11.5m. The proposed development complies with this provision.
	(b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m— (i) is fully integrated into the design of the roof	

Clause		Controls
	or contained and suitably screened from view from public places, and (ii) is limited to an area of no more than 20% of the surface area of the roof, and (iii) does not result in the building having a height of more thl11.5m,	
	(c) the density and scale of the buildings when expressed as a floor space ratio is 1:1 or less,	The proposal has a FSR of 1:1 and complies with this provision. We note that the site area is 7,159.6m^2, however the FSR is calculated on a site area of 7,077.74m^2 on account of the biodiversity values map applying to 81.86m^2 of the site. The proposed development results in a maximum GFA of 7,039m^2 and resultant FSR of 1:1 (excluding the environmentally sensitive land). Therefore, the proposed development complies with the maximum FSR allowed under the Housing SEPP. Further detail is provided in **Section 6.1.5**Error! Unknown switch argument..
	(j) (d) internal and external communal open spaces with a total area of at least— (ii) for a residential care facility—10m^2 for every bed,	The proposed development will provide a combined area of 1,952m^2 across the site. This equates to approximately 12m^2 for each RCF bed exceeds the requirements under clause 107 of the Housing SEPP.
	€ at least 15m^2 of landscaped area for every bed,	The proposal provides 2,858m^2 of landscaped area, which excludes the environmentally sensitive portion of the site. This equates to approximately 17m^2 provided to each resident.
	(f) a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 6m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site,	The proposal will provide a total of 1,833m^2 of combined deep soil which excludes the environmentally sensitive portion of the site. This equates to 26% of deep soil, which is distributed throughout the site on the front, rear and side setbacks. 71% of the total required deep soil area is provided to the rear of the site.
	(g) for a hostel—at least 1 parking space for every 10 beds in the hostel, (h) for a residential care facility—at least 1 parking space for every 15 beds in the facility, (i) at least 1 parking space for every 2 employees who are on duty at the same time, (j) at least 1 parking space for the purpose of ambulance parking.	The proposal requires 11 residential parking spaces, 1 ambulance bay and 16 staff spaces totalling 28 spaces based on a maximum of 32 employees. The proposal will provide a total of 30 parking spaces (inclusive of 2 accessible spaces) within the basement and 1 ambulance bay at grade. A Traffic Impact Assessment is included at **Appendix P** detailing compliance with the Housing SEPP.

Draft Seniors Housing Design Guide

The *Draft Seniors Housing Design Guide* (Design Guide) was exhibited between 22 November 2022 and 13 January 2023. This Design Guide seeks to inform the design and assessment of seniors housing and is to be given effect through the Housing SEPP.

The Design Guide is currently in draft and is not strictly a relevant matter for consideration, and therefore could change in its finalisation following public exhibition. A more detailed comprehensive assessment can be undertaken upon finalisation at a later stage. Notwithstanding this, a summary of the proposal's consistency with the principles of the Draft Seniors Housing Design Guide is provided below.

Table 13Draft Seniors Housing Design Guide Assessment

Guidance	Comment
Care for the planet	The proposed RCF incorporates the principles of ecologically sustainable design through the inclusion of solar panels, thoughtful orientation of the building to the north to maximise solar access and thermal comfort. JHA has prepared an ESD Report in Appendix Q, which sets out the various ESD initiatives that are being incorporated into the development and confirms that the proposed development meets the relevant energy and water reduction targets.
Site analysis – environmental response	The desirable elements of the existing character of the site has been considered as part of the site analysis informing the design of the proposal. It will embed a green network of both recreational and ecological spaces that will contribute to the visual quality of the precinct.
Site analysis – urban response	The proposed design is in accordance with the zone objectives, desirable elements of the locations character and more specifically the interface of the site between recreational land to the south and residential land to the north.
Care, wellbeing and community	The RCF will provide positive social benefits for future residents with the delivery of a high quality, innovative care community, with ample outdoor landscaped areas, to achieve high levels of wellbeing and health for future residents.
Design for physical ageing and dementia	The design of the future building is aligned with the outcomes of community engagement, and incorporates green space, flexible rooms, indoor and outdoor spaces and private spaces. The RCF is easily navigable and provides large, level floor plates for ease of access.
Design principles	Pride of place and placemaking: The proposed RCF incorporates world class urban design and architectural quality to create a high quality place with building design and innovation to meet modern day standards of seniors living. • Whole environment: The design response will embrace the site's natural setting to embed a green network of both recreational and ecological spaces. • External appeal: The proposed development responds to the context of the site, in particular the residential dwellings to the north and east and the recreational dog park to the south, and achieves a high quality built form and urban design outcome. • General planning arrangement: The RCF has been designed to suit the operational and functional needs of the Opal service offering and relevant standards for RCFs. • Entry and arrival: The entry lobby to the proposed development has been appropriately delineated through landscaping, driveway design and footpaths. • Public place and front of house: The proposed design addresses the street through the siting of proposed built form, provides substantial landscaping and the retention of existing trees. • Resident care neighbourhoods: Residents are housed in shared 'households' comprising 15 beds each, across a continuous, consistent flat level. The RCF includes a central back of house commercial kitchen and laundry on the basement level and neighbourhoods including dining, seating and lounge area on the ground and upper floors. • External form: The design achieves the appearance of shorter building lengths and the breaking of residential clusters into smaller elements to articulate and reflect existing local development. • Façade: The proposed development will be constructed using various materials and finishes to create a contemporary, high-quality development that is compatible with the surrounding built form, while providing visual interest and amenity to the streetscape. • Back of house: Back of house and front of house services are located on basement and ground levels, with 15 bed households located on ground and upper levels.

5.6.2 State Environmental Planning Policy (Industry and Employment) 2021

As discussed in **Section 3.6**, the proposed development seeks approval for four building identification signage zones on the western elevation of the RCF building fronting Karne Street North. The proposal is consistent with the objectives of Chapter 3 of *State Environmental Planning Policy (Industry and Employment) 2021* (I & E SEPP) in that it will provide appropriate building identification for Opal Health Care's service offering.

The signage proposed under this application is classified as building/business identification signage. The provisions within Part 3.3 of the I & E SEPP, therefore, do not apply. Only the objectives of Chapter 3 and the criteria in Schedule 5 – Assessment Criteria require consideration.

Schedule 5 contains a range of assessment criteria for consideration in assessing signage applications. The way in which the proposed development has met this assessment criterion is set out in **Table 14** below.

Table 14 Assessment criteria under Schedule 5 of SEPP (industry and Employment) 2021

Assessment Criteria	Comments	Compliant
1. Character of the area		
Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?	The proposed signage zone is of an appropriate size and scale considering its location within a residential zone as part of a RCF. The proposed signage zone is of a size which complements the building and is provided to identify the site and service offering.	Yes
Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?	There is no local theme or character for advertising in the locality.	Yes
2. Special areas		
Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?	The proposed signage zone is of an appropriate size and scale will not detract from the visual quality of the area. The proposal will not have any adverse impact on the amenity or visual quality of the surrounding area.	Yes
3. Views and vistas		
Does the proposal obscure or compromise important views?	The proposal will not have any adverse impact on the amenity or visual quality of the surrounding area and is located below the proposed building line.	Yes
Does the proposal dominate the skyline and reduce the quality of vistas?		
Does the proposal respect the viewing rights of other advertisers?	No other existing advertising structures are located in the vicinity of the proposed signage.	Yes
4. Streetscape, setting and landscape		
Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?	The scale, proportion and form of the proposed signage zone is appropriate as it is complementary with the size of proposed built form. The signage will not protrude beyond the height or width of these structures, ensuring it is also of an appropriate scale, proportion and form.	Yes
Does the proposal contribute to the visual interest of the streetscape, setting or landscape?	The proposed signs will not dominate the streetscape and will contribute to establishing the new seniors living context of the site.	Yes
Does the proposal reduce clutter by rationalising and simplifying existing advertising?	There is no signage at the site currently.	NA
Does the proposal screen unsightliness?	Not applicable to the proposed signage. The proposal does not screen unsightliness.	NA

Assessment Criteria	Comments	Compliant
Does the proposal protrude above buildings, structures or tree canopies in the area or locality?	The proposed signage will not protrude above buildings, structures or tree canopies in the area or locality as it will be affixed to the building.	Yes
Does the proposal require ongoing vegetation management?	The proposal does not require vegetation management.	
5. Site and Building		
Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?	The scale and proportion of the signage zone is consistent and complementary to the building to which it will be affixed.	Yes
Does the proposal respect important features of the site or building, or both?	The proposal is respectful to the neighbouring context of the site and will be of a simple design that effectively identifies and promotes the seniors housing and Opal Healthcare operating on the site.	Yes
Does the proposal show innovation and imagination in its relationship to the site or building, or both?	The signage will be designed to identify the site and is of a simple design.	Yes
6. Associated devices and logos with advertisements and advertising structures		
Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?	The proposed signage will be mounted directly to the proposed building.	Yes
7. Illumination		
Would illumination result in unacceptable glare?	Illumination details will be provided as part of a future application for signage content.	N/A
Would illumination affect safety for pedestrians, vehicles or aircraft?		
Would illumination detract from the amenity of any residence or other form of accommodation?		
Can the intensity of the illumination be adjusted, if necessary?		
Is the illumination subject to a curfew?		
8. Safety		
Would the proposal reduce the safety for any public road?	Due to the design, location and scale of the signage zone, it will not have any impact on safety for any public road, pedestrians or pedestrians by obscuring sightlines.	Yes
Would the proposal reduce the safety for pedestrians or bicyclists?		
Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?		

6.0 Assessment of Impacts

This section of the report assesses and responds to the environmental impacts of the proposed SSDA application. It addresses the matters for consideration set out in the SEARs (see **Attachment A**). The Mitigation Measures proposed to mitigate any environmental impacts are provided at **Attachment C** and complement the findings of this section.

6.1 Built Form and Urban Design

6.1.1 Urban Design, Bulk and Scale

The proposed development responds to the context of the site, in particular the residential dwellings to the north and east and the recreational dog park to the south, and achieves a high quality built form and urban design outcome. The proposal is consistent with Opal's vision for the site and provides high quality residential care assists in reducing the current and growing future shortfall in residential care beds in the City of Canterbury-Bankstown, thereby allowing the local community to age in place.

Built form and design parameters have been established in consultation with the Government Architect NSW State Design Review Panel (GA NSW SDRP) as well as the Housing SEPP and CLEP 2012. Specifically, a key recommendation from the GA NSW SDRP regarding the built form was *"prioritising height to the south of the site to help shield the proposal from the M5, reduce overshadowing to the internal courtyard, and provide a marker for the end of the street"*. A Design Review Report has been prepared by Group GSA and is included at **Appendix C**.

The intended outcome for the proposal is to facilitate a seniors housing development which recognises the strategic merit of providing additional housing on the site and enables additional high quality seniors housing associated with an established healthcare provider that is consistent with the goals and vision of the City of Canterbury-Bankstown and the NSW State Government. It seeks to provide for the appropriate functioning of a RCF development, result in an orderly and economic use of land and respond to the environmental attributes and the surrounding context, capitalising on the site's strategic merit.

As part of the architectural process, Group GSA has undertaken various iterations of modelling and testing to understand the site's opportunities and constraints which has informed the proposed urban design and scale of the development as shown in the Urban Design Report at **Appendix B**. This analysis has illustrated that the site can accommodate the practical functionalities of a RCF while being commensurate to surrounding development.

The proposed built form is a measured response to the site's context and constraints. The site is located adjacent to the established low density residential area of Narwee with single dwellings and multi dwelling housing being the dominant development typologies which surrounds the site to the east, north and west. The Richard Podmore Dog Park is located to the south of the site, being a large, flat grassed park. Further south, the acoustic wall of the M5 Motorway is screened by shrubs and trees. The massing, siting and setbacks of the proposed buildings has carefully considered this context and the development successfully responds to the natural and built context evident within the surrounds of the site.

To respond to this, Group GSA's architectural design has respected the sensitive interfaces neighbouring the site through introducing a fine grain residential character to the proposal. A substantial landscaped setback has been provided to the functional area of the dog park to the south east to reduce visual impact and mitigate noise to the adjacent park. This creates a visual barrier when viewed from the public domain as well as providing landscaped amenity for residents.

Further, the building has been modulated through recesses with varied setbacks accommodating balconies, terraces and windows to all elevations. This presents a fine grain residential character to the north and east in particular and serves to visually break down the mass of the development into smaller clusters. The reduction of building length creates a more human scale and is representative of the bulk and mass of surrounding buildings.

The proposed building massing and concept is shown at **Figure 27** below.

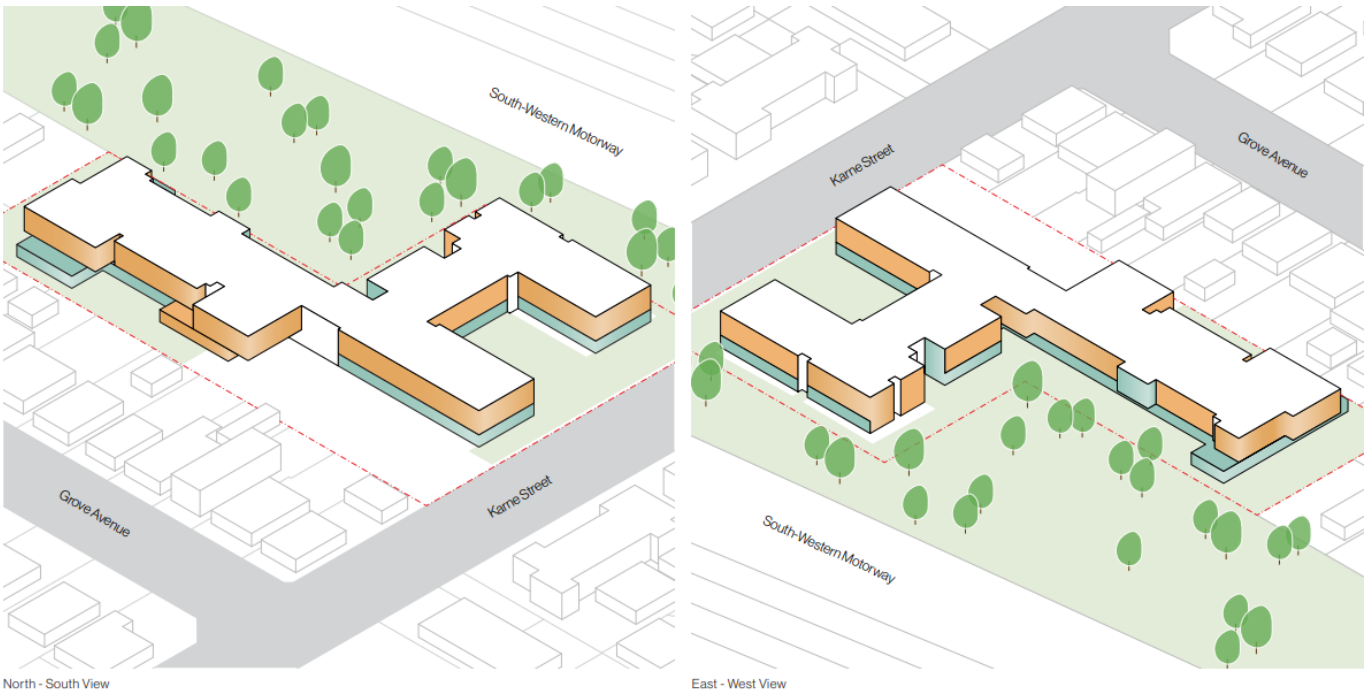


Figure 27 Proposed building massing and concept (viewed towards the south east (left) and towards the north west (right))

Source: Group GSA

6.1.2 Building Height

The site is afforded a maximum building height of 8.5m under the CLEP 2012. However, given that Part 5 of the Housing SEPP applies, a maximum building height development standard of 9.5m applies pursuant to Section 84(2)(c)(i).

The proposed development varies the maximum building height control under Section 84(2)(c)(i) by a maximum of 1.1m and therefore proposes a maximum building height of 10.6m (11.6% variation). It is important to note that this variation is limited to the southern wing of the building given the 6m fall across the site and the ground level variability as well as the functional design and requirement for RCF buildings to have level floor plates. A clause 4.6 Variation Request to Section 84(2)(c) of the Housing SEPP has been prepared and is included at **Appendix BB**.

Figure 28 below illustrates the 9.5m height plane and where the proposal only results in a minor non-compliance with the building height development standard. It has also had regard to the feedback received from the GANSW SDRP where recommendations were made to shift the building envelope south to retain established trees in the northern and western frontages and allow for appropriate deep soil zones.

The purpose of the control is to control maximum building heights in low-medium residential density zones where residential flat buildings are not permitted. The intent of the Housing SEPP maximum building height development standard is to control built form across a site and to maintain the character of an area.

While there are no specific objectives contained within Part 5 or Section 84 of the Housing SEPP, Section 3 Principles of Policy states the following:

> *(a) enabling the development of diverse housing types, including purpose-built rental housing,*
> *(b) encouraging the development of housing that will meet the needs of more vulnerable members of the community, including very low to moderate income households, seniors and people with a disability,*

As discussed in the clause 4.6 variation request at **Appendix BB**, the proposed development directly aligns with the R3 Medium Density Residential zone objectives and the Principles of Policy and therefore, the minor height non-compliance is considered appropriate as:

- Due to the site's irregular shape, the proposal has had regard to its most sensitive interfaces to the north and east where principal private open space is located at the rear of dwellings fronting Grove Avenue. The proposed development provides for a fully compliant built form to these interfaces;

- While the non-compliance is localised to the southern portion of the site adjoining public open space, the overshadowing cast by the development is generally limited to the battle-axe handle of the park which is a narrow stretch, providing direct access to the main area of public open space. Notably, most users of the park would move through this area to access the wider area towards the east of the site;
- The overshadowing cast by the proposed development is generally in accordance with that which would be cast by a DCP compliant building envelope and the previous built form on the site as shown in **Appendix B** and discussed in **Section 6.1.3**;
- The proposed building siting allows for increased deep soil zones along the northern boundary and the retention of existing trees within the western setback (specifically Tree no. 6). This will improve the site's interface with residential development and provides an appropriate streetscape character, retaining natural elements within the front setback;
- Strict compliance with this control would result in a reduction of an entire household (15 RCF beds). It is noted that the proposal complies with the 1:1 FSR non-discretionary development standard and a reduction in beds would result in a development that is substantially below the maximum FSR. This would result in a development that does not meet the forecast supply of beds by 2031 in the catchment area (10km radius from the site) of approximately -300 by 2026 and -1,170 without the proposed development. Therefore, the strict compliance would result in an inferior public benefit outcome given the growing acute shortage of beds in the City of Canterbury-Bankstown area and wider catchment; and
- Further, as the exceedance is restricted to the southern portion of the site and the proposal complies with the maximum FSR control of 1:1, it does not relate to increased sensitive above what is contemplated under section 107 of the Housing SEPP. Importantly, a majority of the site sits below the 9.5m building height development standard and the minor exceedance is a result of the topographical change and the requirement for level floor plates across the development.

It is noted, in accordance with section 84(3) servicing equipment must be limited to an area of no more than 20% of the roof area and not result in a building height of more than 11.5m. As detailed on the Architectural Plans and the Design Report at **Appendix A** and **Appendix B**, the proposed development complies with this standard (refer **Figure 28**).

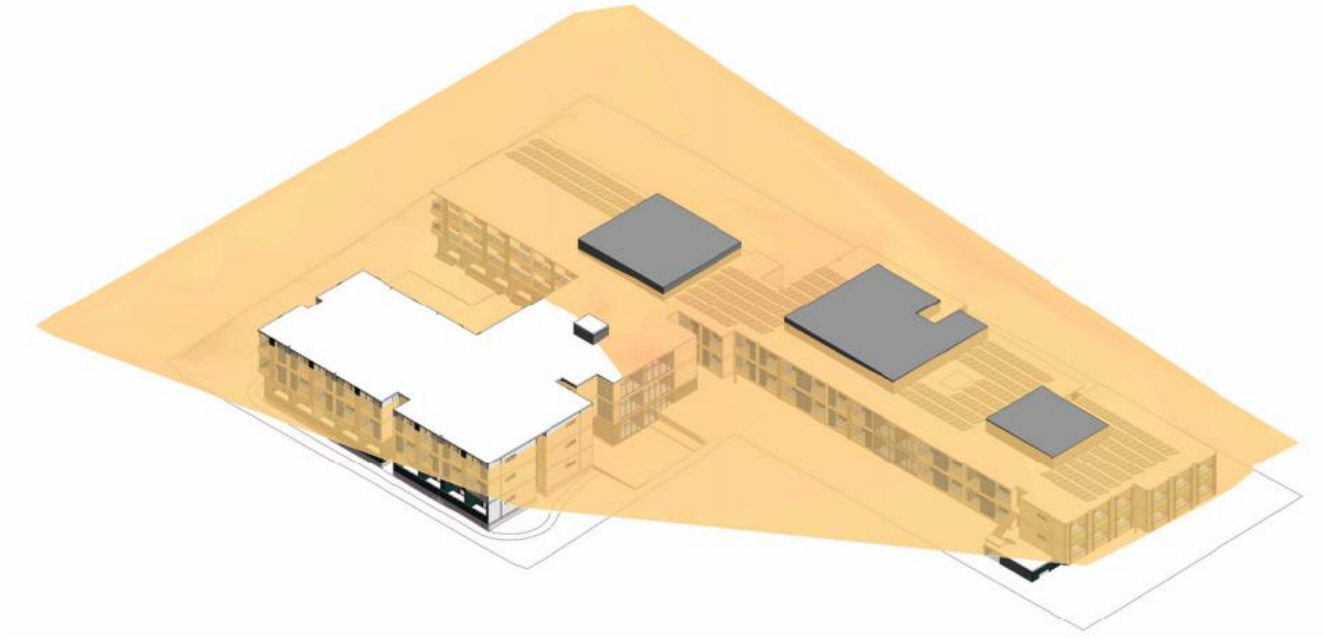


Figure 28 Housing SEPP 9.5m height plane

Source: Group GSA

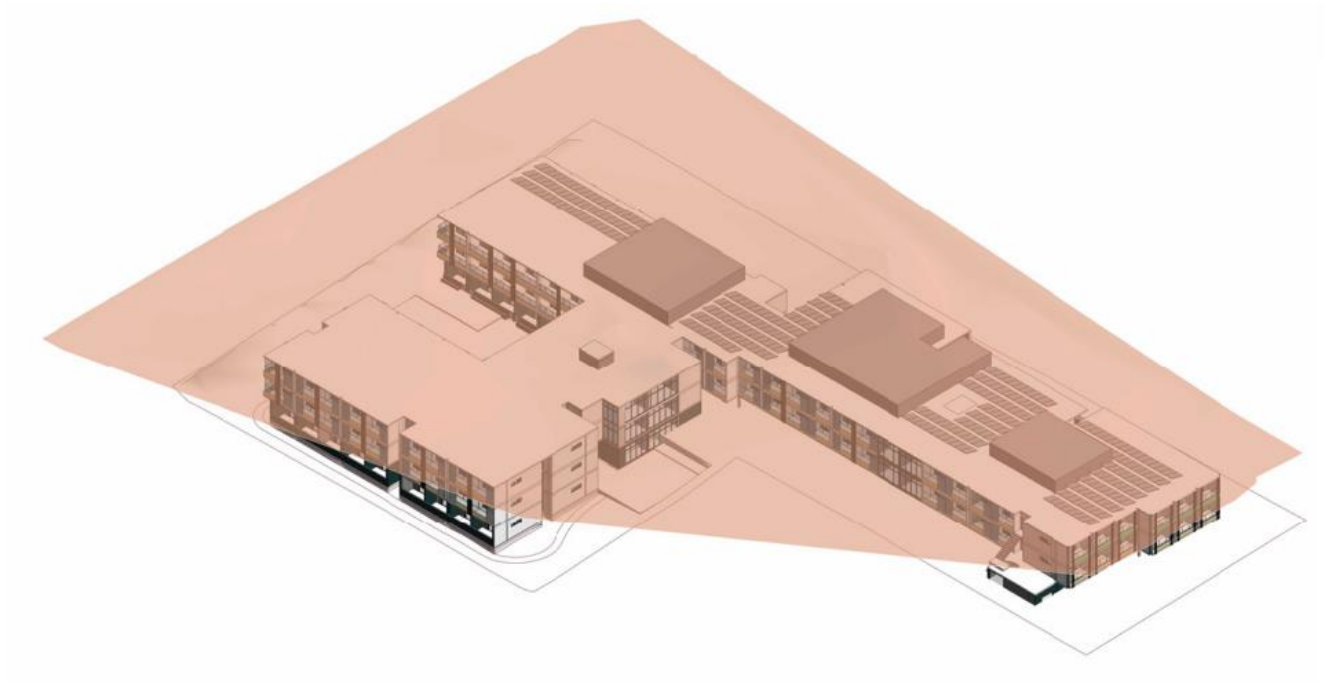


Figure 29 Housing SEPP 11.5m height plane (servicing equipment)

Source: Group GSA

6.1.3 45 Degree Setback to the Third Storey

Section 84 applies to the proposed development as the site is located in the R3 zone where residential flat buildings are not permitted. Therefore, the site is subject to a 45 degree setback standard where the proposal results in a building of more than 2 storeys on side and rear boundaries (section 84(2)(c)(iii)).

While the proposed development generally complies section 84(2)(c)(iii) (refer **Figure 30**) a minor non-compliance to the third storey at the site's southern interface is proposed (refer **Figure 31**). It is considered that this standard should be read in conjunction with section 84(2)(c) as it relates to building height (refer to **Section 6.1.2**).

It is considered that the purpose of this standard is primarily to avoid an abrupt change in scale and secondarily to protect amenity (i.e. solar access, visual privacy and visual amenity) of adjoining residential development.

Given the site is irregular in shape, the architectural design including building siting and massing has had regard to the adjoining development and specifically the interface with residential dwellings to the north and east. This design is considered to align with the intent and purpose of the provision where it provides a fully compliant built form and allows for appropriate amenity and privacy to all dwellings to the north and east of the site. While the proposal results in a non-compliance in the southern portion where it fronts Richard Podmore Dog Park, this is considered appropriate, and the intent of the standard is achieved notwithstanding the non-compliance as:

- The site is irregular in shape and the proposal recognises the most sensitive interfaces where the rear of adjoining properties and private open space is located. While some overshadowing is cast onto Richard Podmore Dog Park, this is generally limited to the battle-axe handle where users will quickly move through to access the wider area of open space to the east of the site;
- To the south of the site, the overshadowing cast by the proposed development during the winter solstice is generally negligible when considering the total area of the park. The total area of Richard Podmore Dog Park is 4,262m^2. During the winter solstice the proposal will result in some overshadowing to the battle-axe handle and northern portion of the park during the early morning period (29% of total area of the park overshadowed), at midday the shadow cast by the proposed development is 18% and by the late afternoon period (3pm) the total area overshadowed by the proposed development is 40%. It is noted that the pre-existing aged care facility on the site resulted in a similar shadow cast to the park: 31% at 9am, 20% at midday and 44% at 3pm and a similar shadow would be cast by a DCP compliant built form as illustrated in the Urban Design Report at **Appendix B**. Therefore, this is considered acceptable as the shadow is cast to the narrow entry point and to the northern boundary where utilisation would be minimal / varied and the wider area of the park still receives appropriate solar access. This shadow analysis is included in the Urban Design Report at **Appendix B**;

- The proposal allows for retention of trees and landscaping embellishments including substantial deep soil zones along each boundary so as to avoid an abrupt change in scale and provide additional amenity and privacy to all adjoining dwellings and adjoining open space where possible;
- The proposal provides for significant setbacks to the western, northern and eastern boundaries and is oriented to protect amenity for all adjoining residents, only results in some overshadowing to the park to the south and therefore does not inflict adverse impacts on surrounding buildings or public amenity; and
- The proposed high quality architectural design, materiality and configuration of the site provides an improved urban design outcome from the pre-existing aged care facility and current presentation.

A clause 4.6 variation request is included at **Appendix BB** which provides further analysis on the proposal compliance with the intent of the provision.

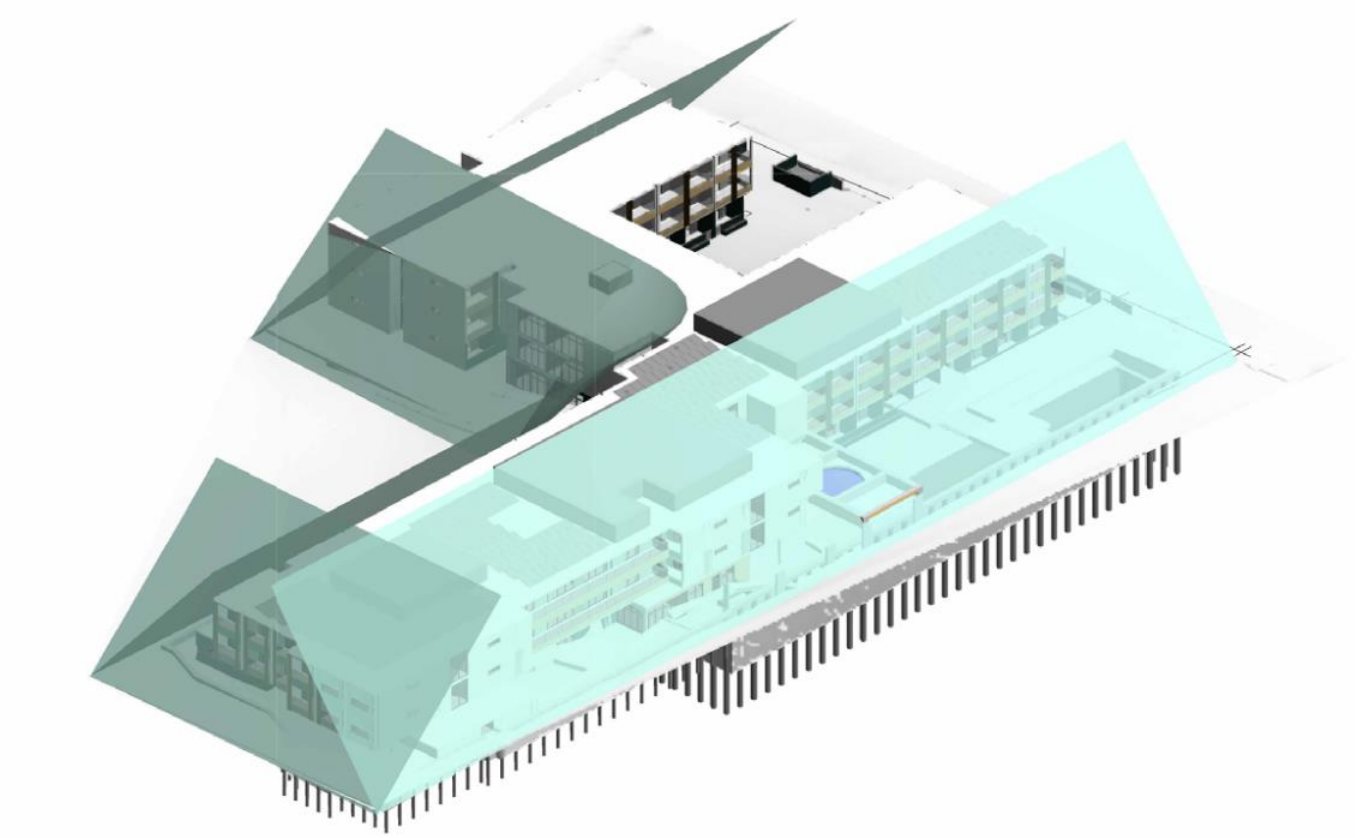


Figure 30 Housing SEPP 45 degree setback control – viewed towards the south west

Source: Group GSA

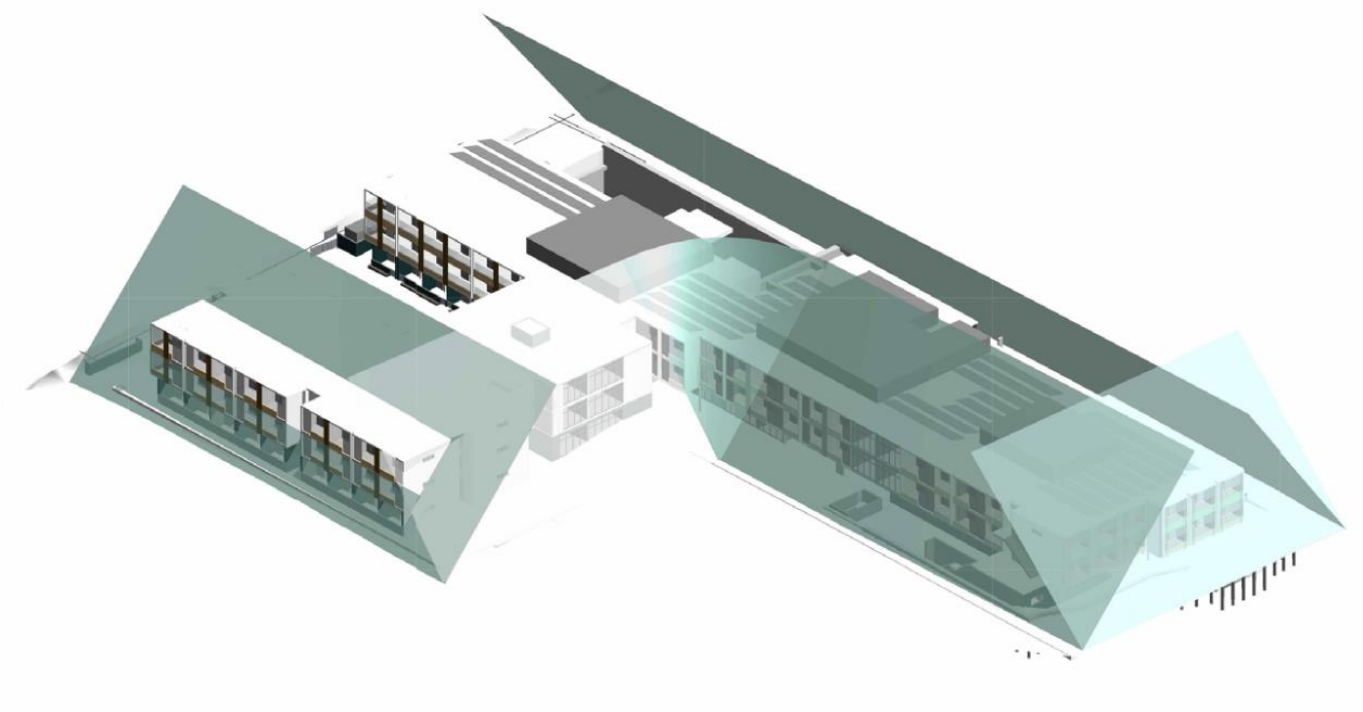


Figure 31 Housing SEPP 45 degree setback control – viewed towards the north west

Source: Group GSA

6.1.4 Setbacks

As discussed above, the proposed building envelope responds to the surrounding residential and recreational context. As there are no prescribed setback controls relating to the seniors housing land use and the site, the setbacks have been considered and align with the interface to residential land to the north and east of the site as well as the public open space area to the south. The proposed setbacks are detailed in **Table 15** and **Figure 32** and **Figure 33** below.

Table 15 Proposed setbacks

Boundary	Ground Floor	Upper floors
Western setback – Karne Street North	6m-11.8m	5m-10.8m
Western portion of the northern boundary - internal driveway and Grove Avenue dwellings	18.4m	18.4m
Eastern portion of the northern boundary – Grove Avenue dwellings	3.1m-7m	7m-8.9m
Northern portion of the eastern boundary – Grove Ave dwellings	12.3m	7.9m
Southern portion of the eastern boundary – Richard Podmore dog park	12.3m	10.2m
Eastern portion of the southern boundary – Richard Podmore dog park	3m- 11.5m	7.1m-7.7m
Western portion of the southern boundary – Richard Podmore dog park	2.8m	2.9m

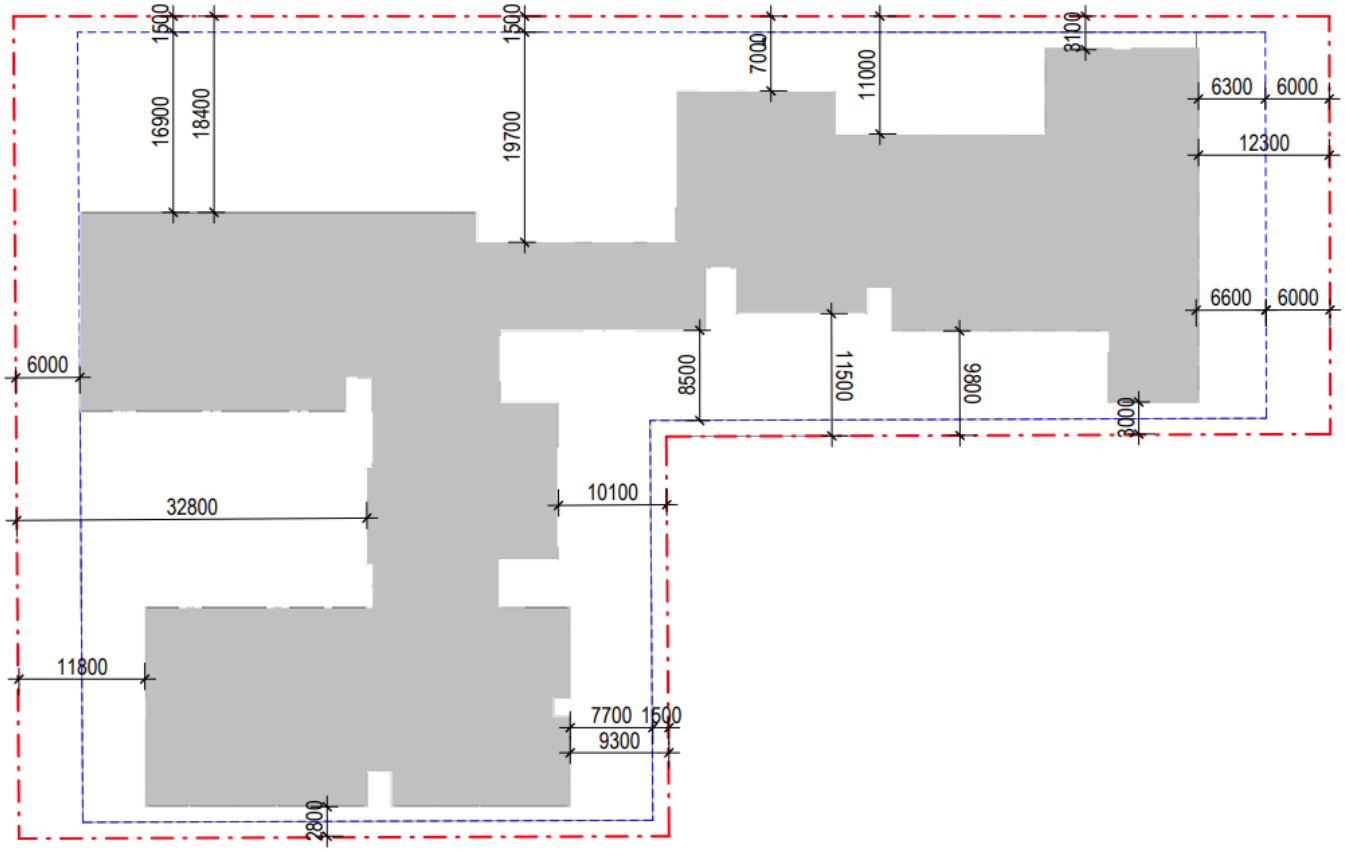


Figure 32 Proposed Ground level setbacks

Source: Group GSA

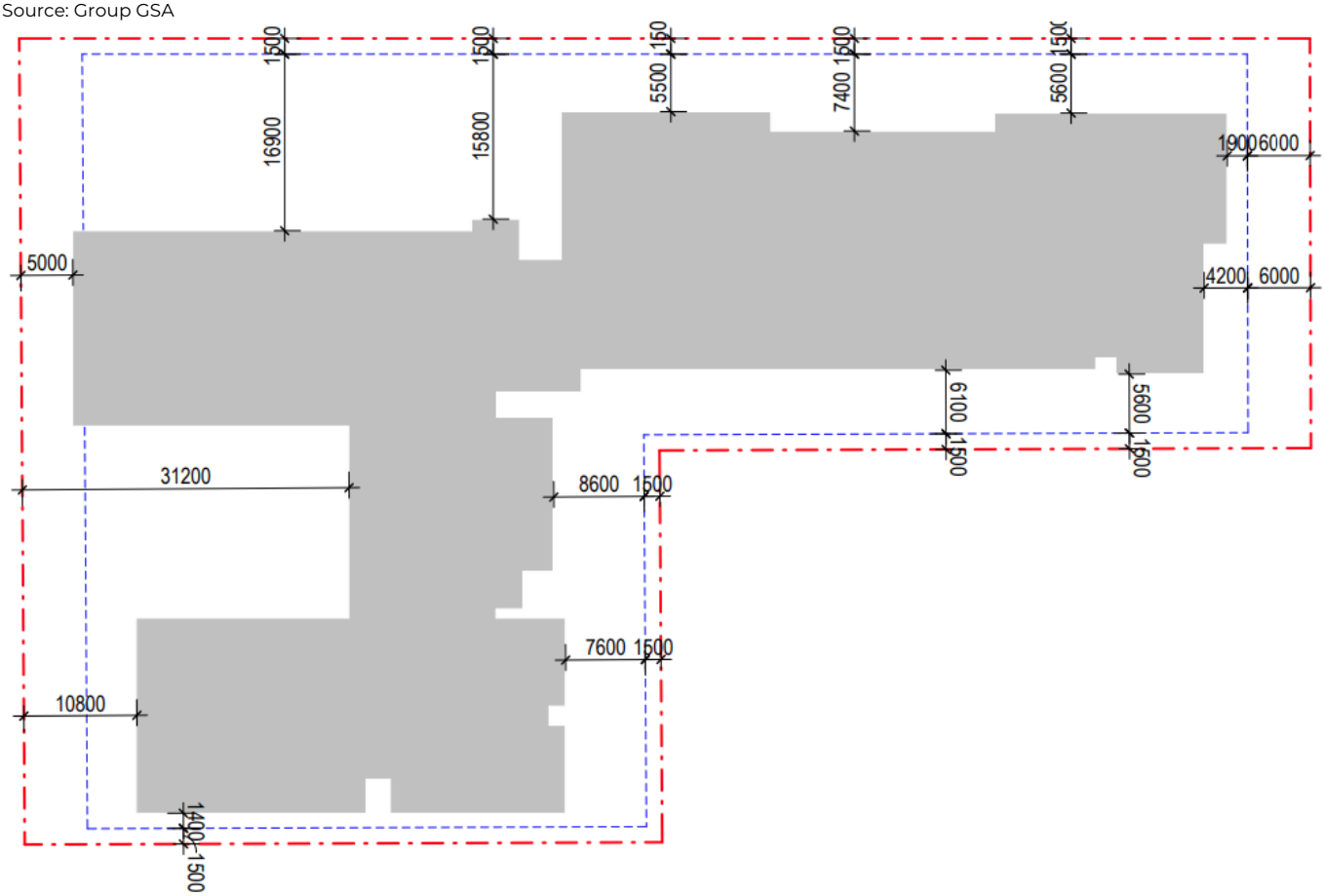


Figure 33 Proposed upper level setbacks (roof plan)

Source: Group GSA

The above analysis demonstrates that the upper levels step back to the north and north east, thereby respecting the residential interface of these two side boundaries. The reduced setbacks adopted to the southern building wing overlooking the dog park have arisen as a result of the retention of Tree 6 which was raised in the first SDRP meeting. The retention of this tree required reduced setbacks to the battle-axe handle of the dog park to the south. As discussed in **Section 6.1.2** and **6.1.3** above, this setback is considered acceptable for the following reasons:

- The battle-axe handle of the dog park is a narrow stretch of the park which functionally provides access to the main portion of the dog park to the rear. Most users of the park would be utilising the larger, regularly shaped portion of the park to the rear, which is set back further from the building;
- Siting the buildings in this manner results in the retention of Tree 6 and the provision of a deep soil courtyard facing Karnes Street North, improving the natural amenity and landscape presentation to the public domain;
- The proposed siting allows for appropriate basement access into the car park, which can be provided to the north of the site and provide vehicular access to the RCF as well as perform its back of house functions. The siting of the driveway to the north also allows for built form to be set back from residential dwellings to the north.
- This approach allows for the southern portion of the eastern setback and the eastern portion of the southern setback to adopt increased setbacks (9.2-10m) and reduce overshadowing impacts onto the dog park.

The Urban Design Report at **Appendix B** illustrates that the setbacks substantially exceeds those contained in the CDCP 2012 for two storey townhouses within R3 Medium Density Residential zones.
Therefore, through consideration of substantial setbacks to adjoining development and land uses as well as the landscaping strategy, including large deep soil zones to the rear of the site, this will allow for dense landscaping to further reduce the visual scale of the building and provide appropriate acoustic and visual privacy to residents and neighbours. The proposal will provide a positive impact on the streetscape and neighbouring recreational land and is considered to provide an appropriate built form in the context of the surrounding development.

6.1.5 Floor Space Ratio

The proposed development is for the purposes of seniors housing and comprises a RCF. Pursuant to section 107(2)(c) of the Housing SEPP, the site is afforded a maximum FSR of 1:1.

The total site area is 7,159.6m^2. However, as discussed in **Section 5.2**, a portion of the site equating to 81.86m^2 is identified as 'environmentally sensitive land' under Schedule 3 of the Housing SEPP, being land identified on the Biodiversity Values Map within the meaning of section 7.3 of the *Biodiversity Conservation Regulation 2017*. Therefore, the site area of the land the subject of the Housing SEPP is 7,077.74m^2.

In accordance with the Housing SEPP, the calculation of GFA for RCFs excludes service activity areas below ground level. In accordance with the Housing SEPP :

> ***gross floor area*** *means the sum of the areas of each floor of a building, where the area of each floor is taken to be the area within the inner face of the external enclosing walls, as measured at a height of 1.4m above each floor level—*
> *(a) excluding columns, fin walls, sun control devices and elements, projections or works outside the general lines of the inner face of the external wall, and*
> *(b) excluding cooling towers, machinery and plant rooms, ancillary storage space and vertical air conditioning ducts, and*
> *(c) excluding—*
> *(i) car parking needed to meet the requirements of this Part or the council of the local government area in which the development is located, and*
> *(ii) internal access to the car parking, and*
>
> *(d) excluding space for the loading and unloading of goods, including access to the space, and*
> *(e) for in-fill self-care housing—including car parking provided at ground level, other than for visitors, in excess of 1 per dwelling, and*
> *(f) for a residential care facility—excluding floor space used for service activities provided by the facility below ground level (existing).*

As illustrated at **Appendix A** and **Appendix B**, the proposed development results in a maximum GFA of 7,039m^2 and resultant FSR of 1:1 (excluding the environmentally sensitive land – refer to

Figure 34). This also excludes basement servicing consistent with the definition of gross floor area in Clause 82 of the Housing SEPP. Therefore, the proposed development complies with the maximum FSR allowed under the Housing SEPP.

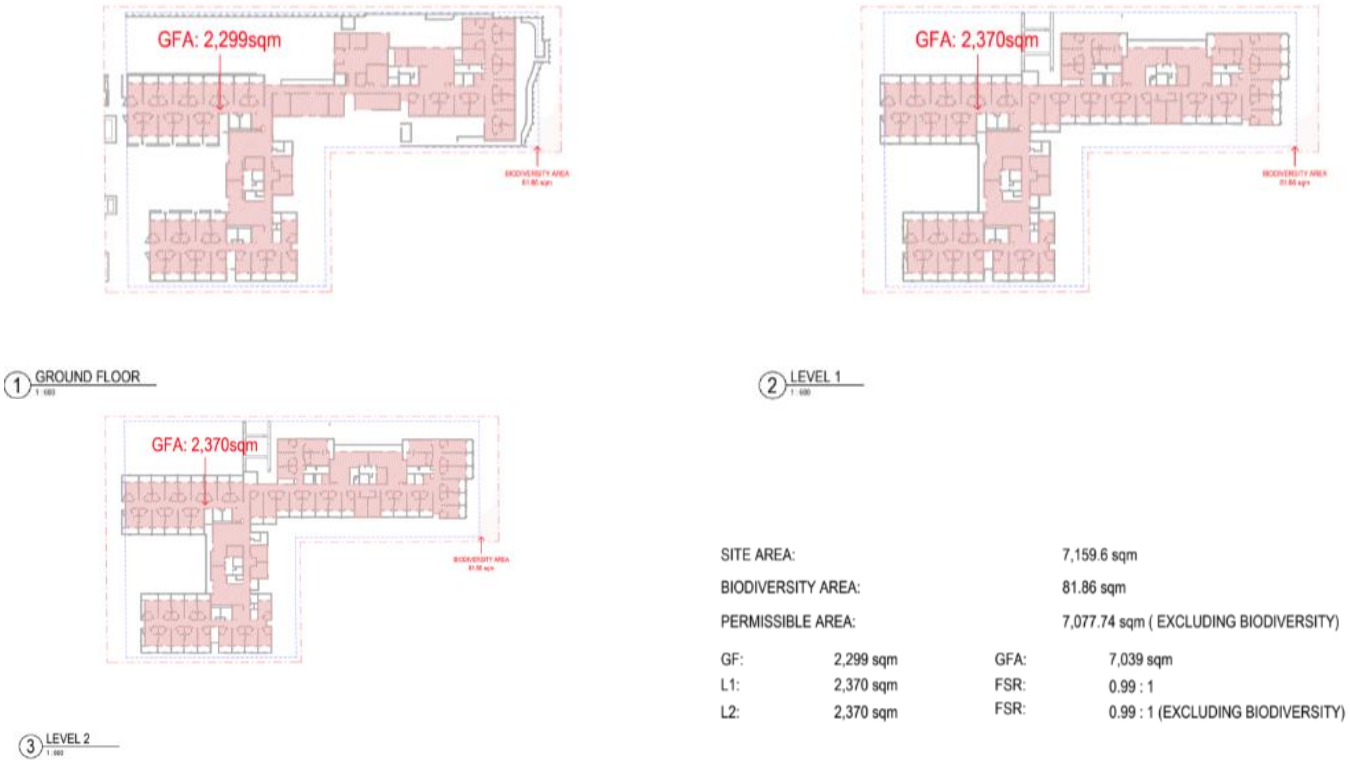


Figure 34 Gross floor area plan

Source: Group GSA

6.1.6 Materiality

The proposal adopts a high quality and tasteful materials palette, with tiling and compressed fibre cement face brick proposed for the façade interspersed with glazing, glass balustrades and screening devices to the windows. The earth tones adopted connects the expression of the building conceptually to the ground, while offering a high-quality finish.

Mature trees are also proposed to all boundaries, with the above combination of natural and built design treatments combining to visually break up the building and reduce the appearance of bulk. A sample of the materials board in the Design Report is provided below in **Figure 35** and **Figure 36**.

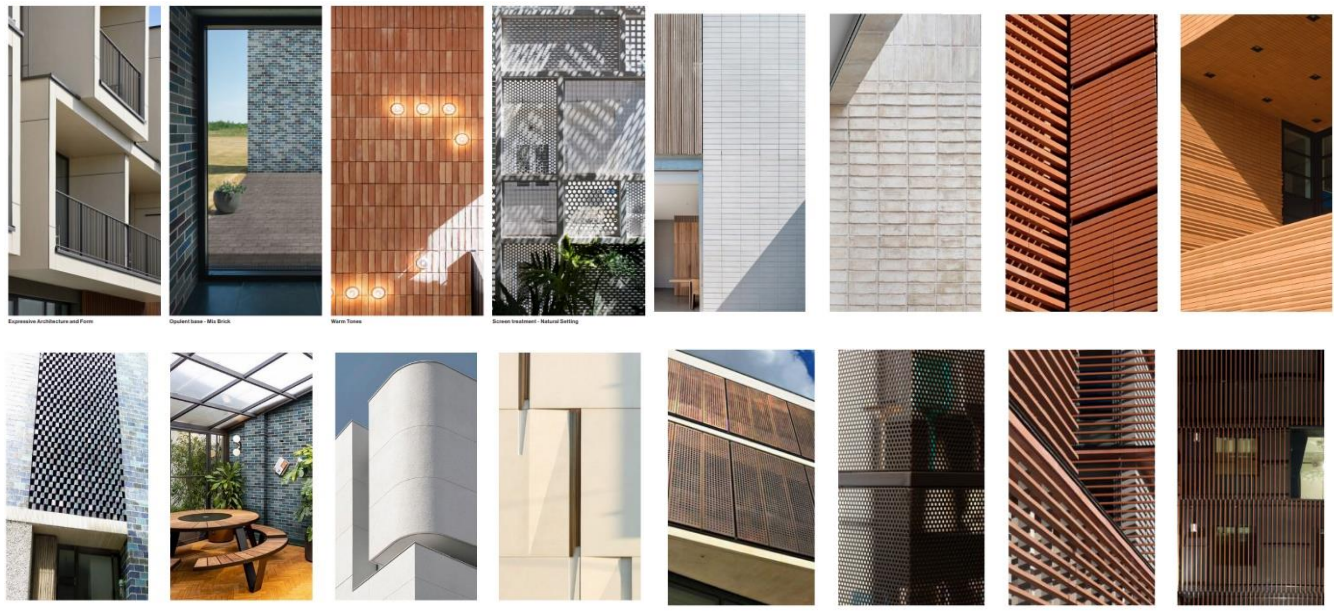


Figure 35 Proposed materials palette

Source: Group GSA

Figure 36 CGI of proposed development as viewed from the proposed driveway

Source: Group GSA

6.2 Environmental Amenity

6.2.1 Overshadowing

This EIS is accompanied by shadow diagrams prepared by Group GSA and included at **Appendix B**. The analysis demonstrates the potential impacts of the proposed development on adjoining properties at one-hour intervals between 9am and 3pm for the 21 June (winter solstice), 21 December (summer solstice), 21 March (autumn equinox) and 23 September (spring equinox) in accordance with the SEARs.

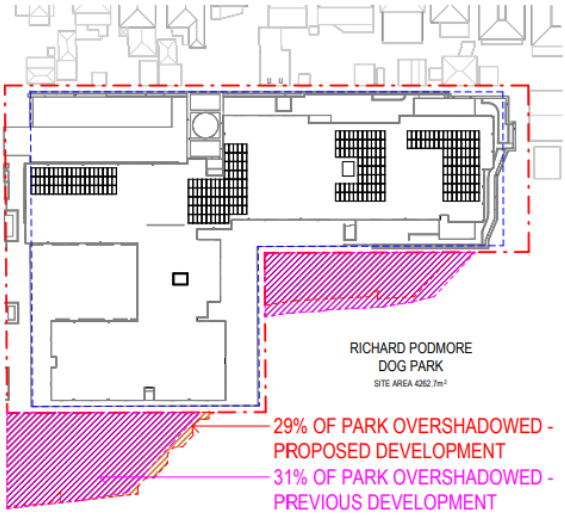
The shadow analysis also contains the shadow impacts of the previous BUPA aged care facility on the site and demonstrates that the proposal presents marginally improved shadow impacts when compared to the previous development, particularly to the south and eastern boundaries fronting onto the dog park.

During the winter solstice, outside of the site at 9am, shadows fall across Karne Street North, the battle-axe handle of the dog park and a small portion of the eastern portion of the dog park along its northern boundary. The extent of the shadowing reduces at 10am and 11am to smaller portions of these areas and the smallest extent of shadowing is achieved at 12pm where the northern boundary of the park is overshadowed. No additional significant overshadowing of the northern boundary of the park occurs until after 2pm and the southern portion of the eastern boundary is not overshadowed until after 2pm. Whilst portions of the park remain in shadow throughout the day such as a portion of the access handle south of the park, the function of this area is to access and exit the park and does not comprise the significant useable area of the dog park, noting that visitors to the dog park use the larger area south east of the site as it is more expansive for recreational purposes and provides typical dog park infrastructure.

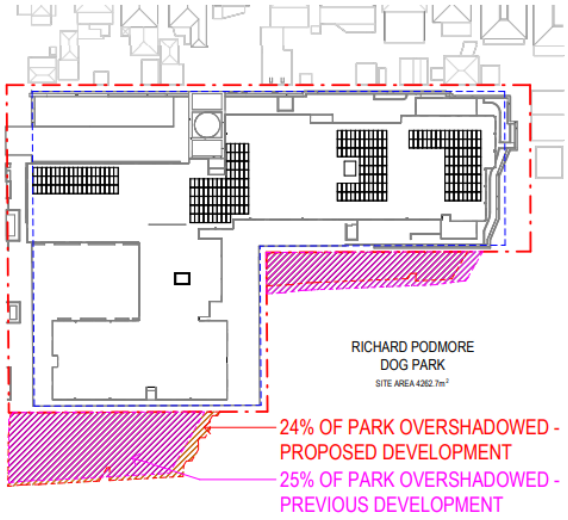
The proposed development has been sensitively designed to not give rise to unreasonable overshadowing impacts to the larger south eastern portion of the dog park which is larger, useable space of the park. Setbacks fronting onto the dog park (being the eastern portion of the southern elevation and the southern portion of the eastern elevation) are greatly increased in this area, with a 9.2m setback on the upper levels facing the dog park. This assists in reducing overshadowing particularly when compared to the previous seniors housing development located on the site. Further, it is noted that this building interface in this portion of the development fully complies with the 45 degree projection development standard in the Housing SEPP.

The eastern residential neighbours are not overshadowed until after 2pm, ensuring that 2 hours of solar access is provided to these properties.

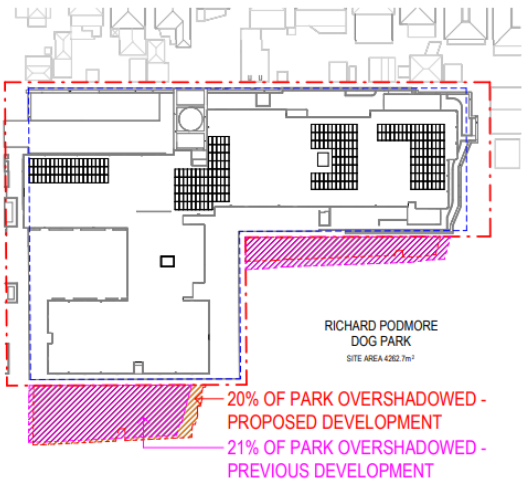
Accordingly, it is considered that the proposed works will not give rise to any unacceptable overshadowing impacts, ensuring appropriate amenity to surrounding properties and open space can still be achieved. The shadow cast during the winter solstice is shown in **Figure 37** below.



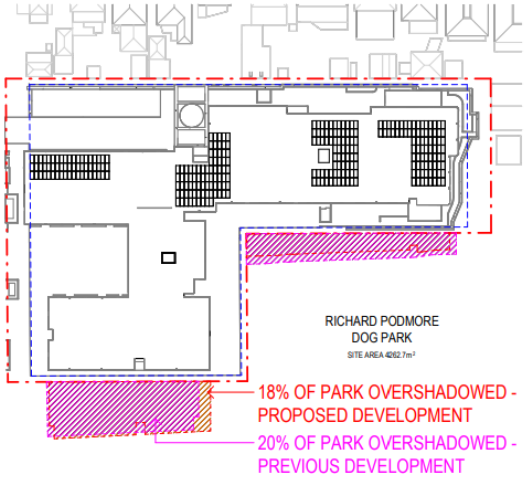
9AM



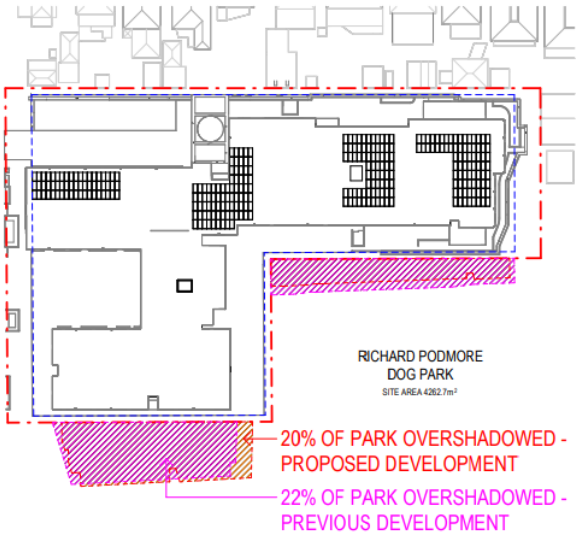
10AM



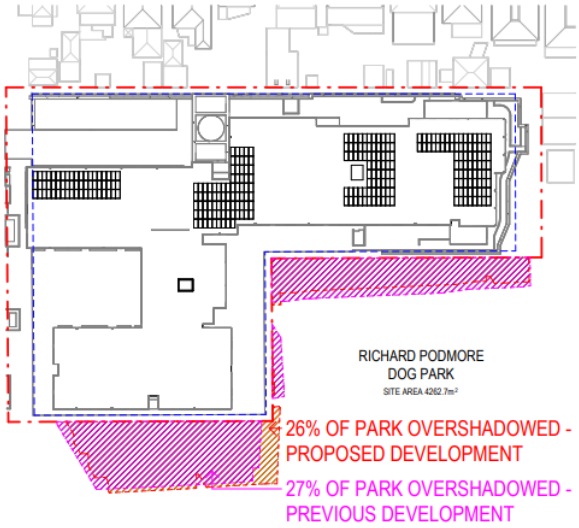
11AM



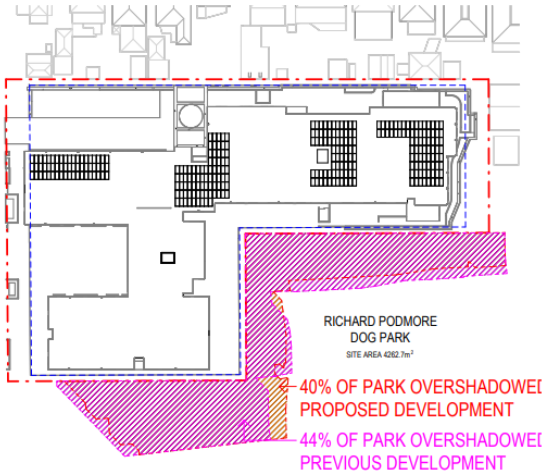
12PM



1PM



2PM



3PM

Figure 37 Overshadowing analysis at the winter solstice (9am to 3pm)

Source: Group GSA

Further shadow analysis undertaken by Group GSA during the autumn and spring equinoxes is shown in **Figure 38** and **Figure 39** below. This demonstrates that overshadowing on other times of the year is largely limited to the access handle of the dog park. Photos of the dog park are included in **Figure 40** and **Figure 41** to demonstrate the extent of the access handle and main dog park area.

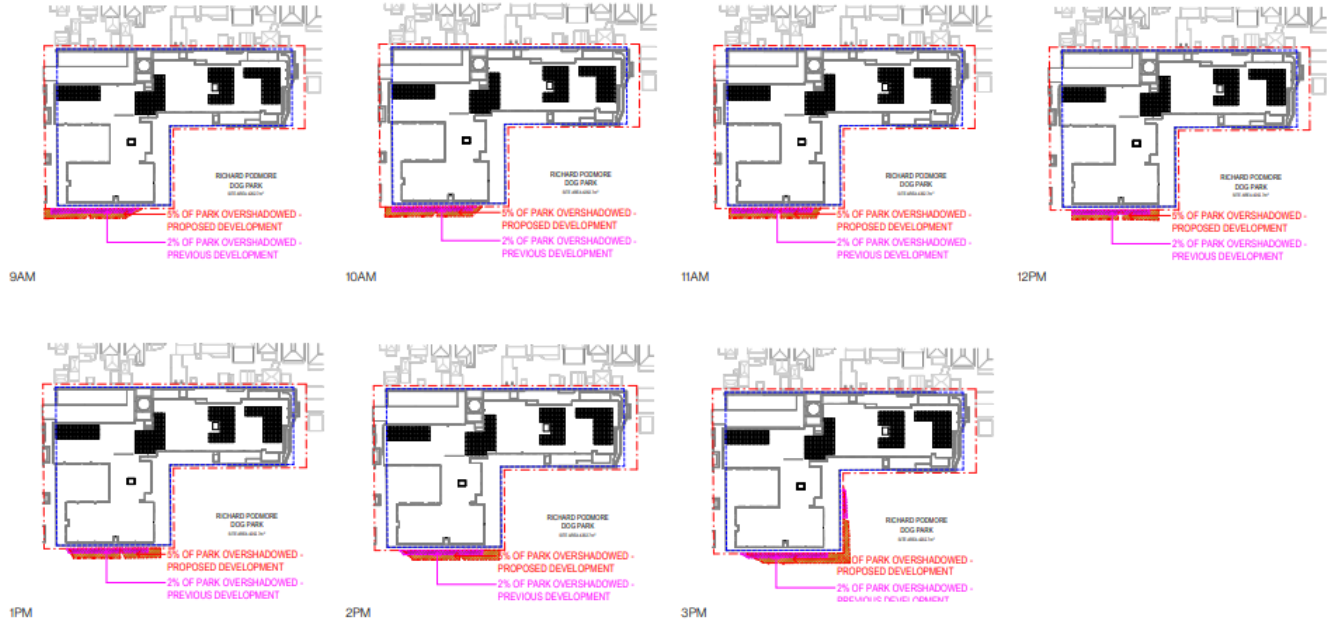


Figure 38 Overshadowing analysis at the autumn equinox (9am to 3pm)

Source: Group GSA

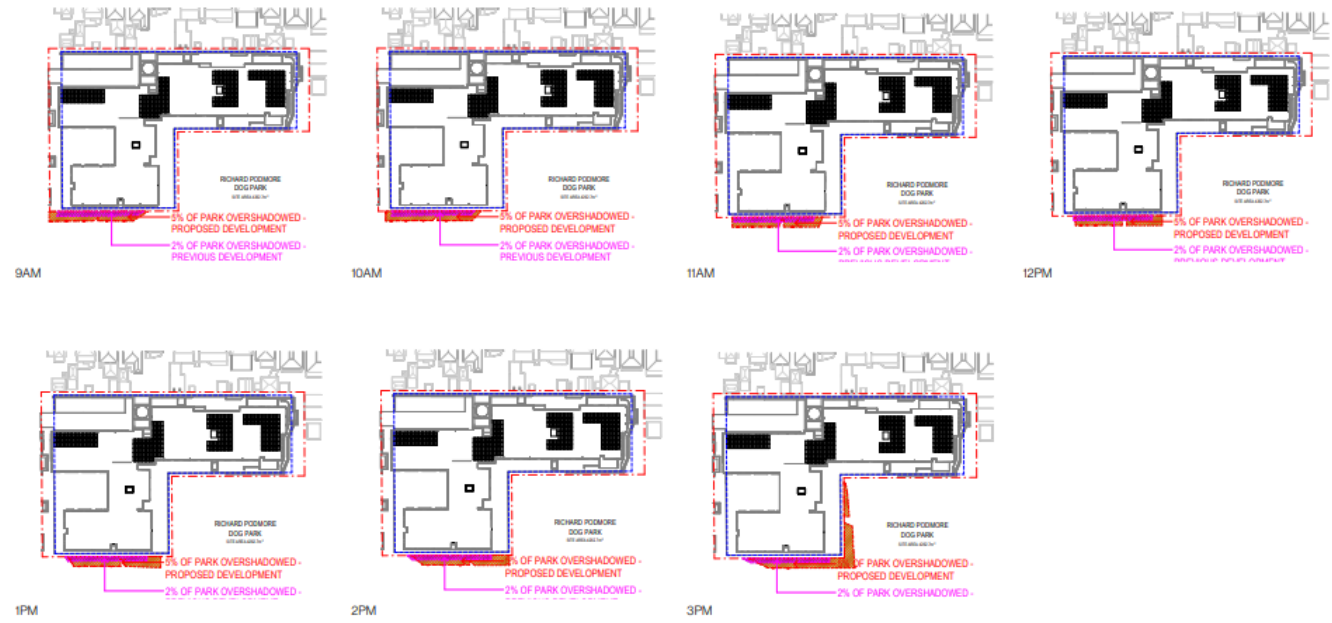


Figure 39 Overshadowing analysis at the spring equinox (9am to 3pm)

Source: Group GSA

Figure 40 Narrow access handle of the dog park, viewed from Karnes Street North

Source: Ethos Urban

Figure 41 Larger, functional area of the dog park

Source: Ethos Urban

6.2.2 Solar Access

Solar access to communal open space has also been considered so as to ensure appropriate amenity for all residents, visitors and staff. Internally, the proposal seeks to optimise the number of apartments receiving sunlight to habitable rooms, with units seeking to orient to the north, west and east where possible, which allow most units to achieve an acceptable degree of solar access throughout the day.

Internally within the site, the western courtyard and the communal areas oriented to the south of the site have portions of the landscaped area overshadowed throughout the day. However, the proposed quantum of landscaping involves the provision of landscaped area to the north and east of the site which has solar access all day and during the morning hours respectively. Therefore, residents may utilise numerous landscaped areas for their enjoyment throughout the day even in mid winter.

6.3 Visual and View Impact

Visual and view impact analysis has been undertaken by Group GSA and is included at **Appendix B**. While visual impacts are inevitable as a result of a new development on a currently vacant site, it is considered to be reasonable having regard to the high quality architectural design, retention of existing mature trees and landscaping embellishments, as well as the project's strategic merit.

6.3.1 Visual Privacy

As aforementioned, the proposal has been sited to respond to the context of the site and address the amenity of units internally within the site and to adjoining residential dwellings to the north and east. In relation to visual privacy, the proposal incorporates various site planning and design responses to adjoining properties so as to reduce any overlooking and obscure direct lines of site both internally and externally.

The orientation and design of the building elevations including windows and balconies has been carefully considered in the design of the proposed development. Windows have been oriented to the east and west where possible except to maximise solar access and north facing terraces have an increased setback to achieve visual privacy outcomes for neighbouring properties. Likewise, the inclusion of significant setbacks and substantial deep soil landscaping ensures an appropriate buffer to adjoining residential development. In achieving this, setbacks are stepped further back on upper floors. For example, the minimum ground floor northern setback is 3m from properties on Grove Avenue, with this increasing to 7m on upper levels. Substantial deep soil landscaping is also proposed along site boundaries in the form of mature trees and shrubs to obscure lines of sight and to screen the proposal from surrounding properties (refer to **Figure 42**).

Internally within the site, offsetting windows and built window screening to habitable rooms will be fitted to provide appropriate visual amelioration in order to mitigate overlooking to adjoining development.

As such, the proposal provides a good level of privacy to both future residents and its neighbours.

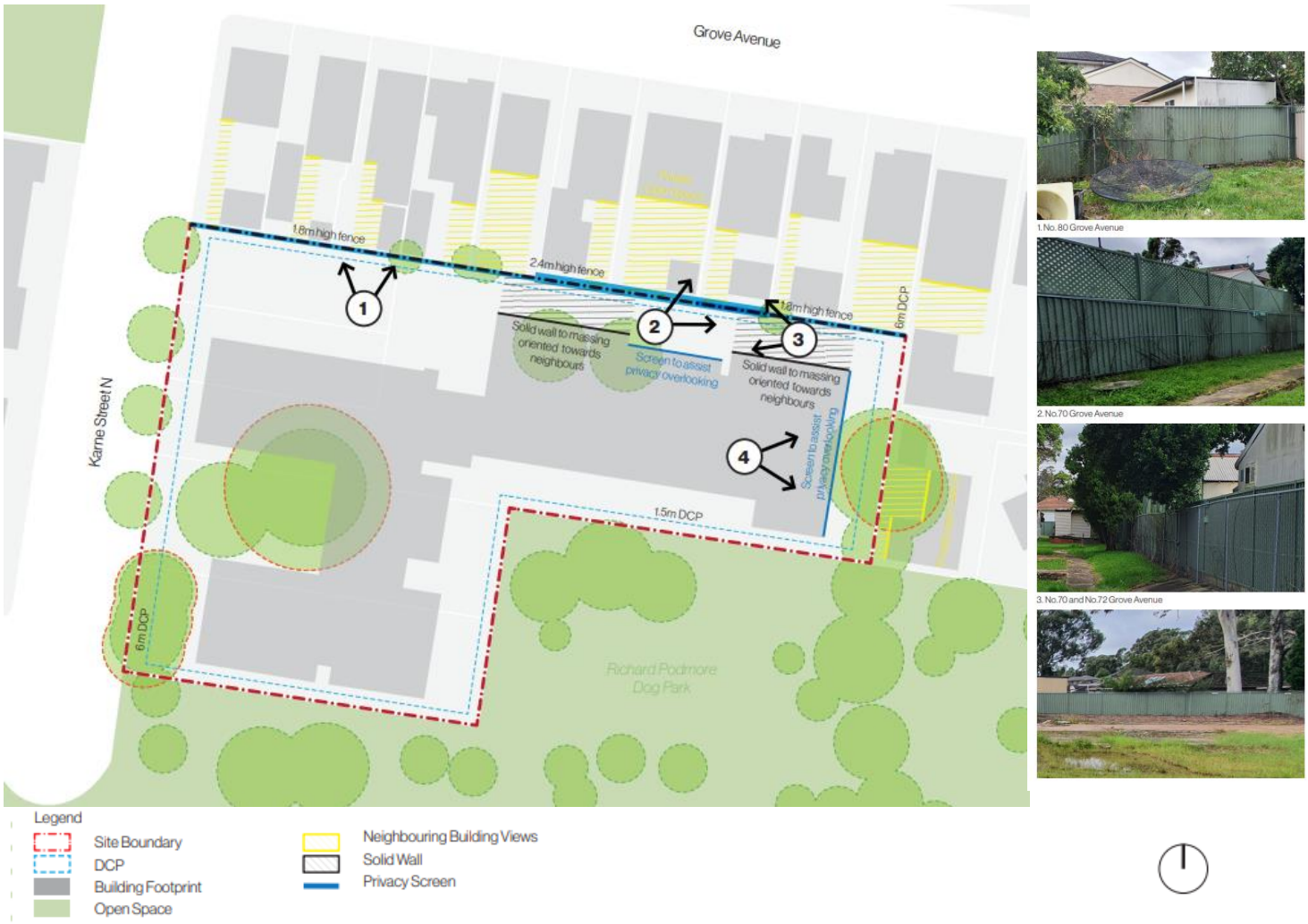


Figure 42 View privacy analysis

Source: Group GSA

6.4 Public Space

With regard to presentation to the public domain, the proposed design addresses the street through the siting of proposed built form, provides substantial landscaping and the retention of existing trees where possible on the site's western frontage as well as providing for pedestrian and vehicular access to the site. The driveways are perpendicular to the street which results in residential units and landscaping to face the public domain with minimal space allocated for vehicular access and servicing. This also provides significant spacing between the proposed western building wing and the dwellings to the north of the site, which serves to sufficiently separate the building forms and provide sightlines from and toward the development.

Extensive boundary and building landscaping treatments are proposed, which assist to soften the built form. In this regard, significant tree plantings within the building setbacks are proposed, including the western courtyard facing the street. This communal open space landscaped element retains the existing Tree 6, activates the streetscape and provides a well landscaped visual break between built form to the north and south. The appearance of this area is illustrated in **Figure 43**.

On the building setbacks to the south and east facing the dog park, substantial deep soil landscaping is proposed in these locations to accommodate mature trees. This is supplemented by groundcovers, shrubs and hedging to screen the proposal from the public domain. Fencing is proposed to separate and delineate the proposal from the public domain.

Figure 43 Photomontage from Karnes Street North

6.4.1 Access

An Accessibility Report has been prepared by Accessible Building Solutions and is included at **Appendix N**. The report confirms the proposed development is capable of complying with the access provisions of the BCA and the Access to Premises Standard.

6.4.2 CPTED

CPTED is a situational crime prevention strategy that focuses on the design, planning and structure of the environment. The CPTED assessment aims to identify the potential opportunities of crime created by the proposed development by assessing the development in accordance with design and place management principles of CPTED. A CPTED Assessment has been prepared by Ethos Urban in **Appendix Z**. The proposal satisfies the principles of CPTED as follows:

- The proposed development provides a high level of natural surveillance, both to the development itself and to the surrounds. The site benefits from multiple frontages that address both the streetscape and also Richard Podmore Dog Park. This SSDA incorporates the following design solutions that maximise on the principle of natural surveillance, including balconies fronting the streetscape, provision of ancillary RCF uses, direct lines of sight to the building entry and the configuration of the basement maximises short sightlines.
- Lighting will be provided internally and externally to the development with recommendations to lighting design provided within the report to maximise effectiveness.
- The proposal will provide a high level of territorial reinforcement, with the following ownership cues including perimeter fencing, a highly visible lobby area from the pedestrian walkway and the activation of the site of balconies and activity areas.
- The proposal provides a higher quality outcome than what previously exists on site, eliminating current conditions that contributed to its overall crime risk rating. This in turn provides the opportunity to act as a catalyst for environmental improvements to the surrounding public areas and provide the opportunity to reduce levels of graffiti, litter, and urban decay, which all negatively impact perceptions of safety; community confidence in using a space; and crime opportunity.
- Effective guardianship in space management plays a critical role in the safety and perceived safety of the proposed development. The ability of Opal to manage and organise on-going activities, events and initiatives etc for future residents improves the sense of community ownership and effective guardianship of public and common spaces.
- The site plan layout is benefitted by a regular and linear orientation of the building and internal layouts, which will assist in facilitating natural surveillance and enabling intuitive wayfinding for persons within the site.

6.5 Tree Removal and Landscaping

The proposal involves the removal of 15 trees, mostly located in the western and northern portions of the site. All trees to be removed have a low and medium retention value.

A total of 18 trees are proposed to be retained, with tree protection methods and strategies including protective fencing, signage, mulching, trunk protection, site management and tree management during construction strategies recommended in the Arborist Report in **Appendix F**.

In conjunction with the high quality architectural design, the proposed development supports the delivery of a significant quantum of new high quality communal open space and landscaped area within and around the site. These include communal landscaped areas, secure garden areas, an inclusive playground and landscape terraces providing natural sensory stimuli to residents. These areas will provide varied landscaping treatments providing different space for residents and staff to utilise.

The proposed design aims to strengthen the landscape character of the surroundings and create formal and informal spaces to promote gathering amongst residents and visitors. The landscape character has been deliberately intertwined with the architectural design and the Connecting to Country framework through the consideration of landscaped design treatments in pavement, seating and landscape art elements.

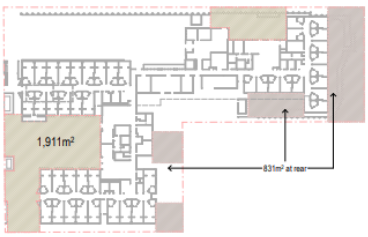
The landscape treatment proposed to the site boundaries include mature trees, shrubs and groundcovers and serve to screen the proposal from neighbouring properties and the public domain. Deep soil zones are located towards the rear of the site in the building setback areas, with larger trees provided along the site boundaries. The following five distinctive landscaped areas are proposed, each providing a different landscape form and function with unique landscaped and natural stimuli to residents:

- Entry area landscaping;
- Memory Care Neighbourhood courtyards (two provided);
- Wellness courtyard;
- Community courtyard; and
- Landscape terraces on each upper level.

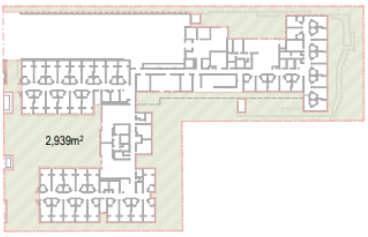
As discussed in **Section 3.8**, the communal open space has been designed to suit the operational needs of Opal and needs of residents, staff and visitors alike through the provision of a variety of functional landscaped areas. Importantly, the proposed landscaping scheme and minimum area requirements have been designed to comply with the Housing SEPP (refer to **Figure 44**). Specifically, the proposal will provide the following landscaped areas in accordance with the Housing SEPP requirements:

Table 16 Housing SEPP landscaped area requirements

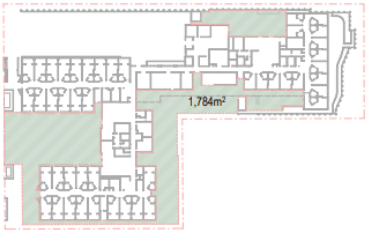
Area	Housing SEPP requirement	Proposed Development (excluding environmentally sensitive land)	Proposed Development (including environmentally sensitive land)
Deep soil	1,061m^2 or 15% of site area	1,833m^2 or 26% of site area	1,911m^2 or 27% of site area
Landscape	2,475m^2 or 15m^2 per bed	2,858m^2 or 17m^2 per bed	2,939m^2 or 18m^2 per bed
Communal open space	1,650m^2 or 10m^2 per bed	1,952m^2 or 12m^2 per bed	2,056m^2 or 12m^2 per bed



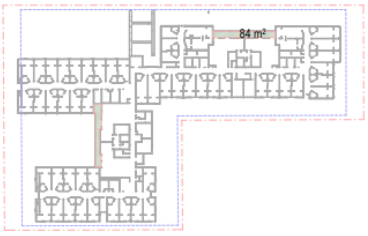
Deep Soil



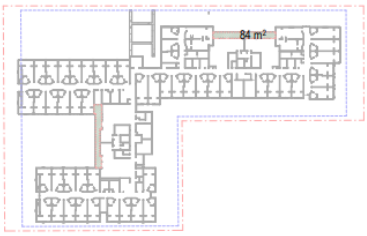
Landscape



GF Communal Open Space



Level 1 Communal Open Space



Level 2 Communal Open Space

Figure 44 Proposed landscaped areas (excluding environmentally sensitive land)

Source: Group GSA

6.6 ESD

An Environmentally Sustainable Development (ESD) Report has been prepared by JHA and is included at **Appendix Q**. This report outlines the relevant sustainability principles and targets applicable to the site, as well as how the proposed development will meet the relevant industry recognised building sustainability and environmental performance standards.

The ESD principles of the precautionary principle, inter generational equity, conservation of biological diversity and improved valuation, pricing and incentive mechanisms as defined in section 193 of the EP&A Regulation have been incorporated into the design and ongoing operation phases of the development as follows:

- The proposal is being designed to incorporate external high-performance glazing and shading devices, together with energy efficiency favoured passive design features to minimise severe or irreversible environmental damage. Further, a Climate Adaptation Plan including a Risk Assessment has been undertaken to include the assessment of natural and urban hazards.
- This development will not cause any significant impact on the health, diversity and productivity of the environment and will provide a community benefit in the form of increased residents, employee capacity, upgraded living, caring, and working facilities.
- A Landscape Report and Ecological Assessment accompanies this application in **Appendix E** and **G** to ensure the proposed development will not have a significant effect on any threatened species, endangered communities, or their habitat.
- The project team has assessed the materials proposed for this project using the industry recognised building sustainability standards, Green Star Rating System. The construction material will be selected based on the outcomes of relative cost benefit analysis with decisions being made based on the whole-of-life costs rather than capital expenditure only. Certified recycled and reused materials, as well as materials with low embodied energy, will be preferred over others.

Sustainable design initiatives have been selected based on the NCC Section J and Industry recognised sustainability standards, including Green Star Buildings v1 guidelines. Consistency with the performance targets in relation to building fabric, glazing, shadowing, ventilation is outlined in Section 4 of the ESD Report. Energy efficiency is promoted through the use of solar panels, energy efficient HVAC systems, lighting, appliances and equipment. Water conservation is promoted through the use of high rated WELS rated fittings, rainwater reuse and WSUD practices.

The assessment demonstrates that the proposal will be consistent with the principles of ESD.

6.7 Traffic, Transport and Accessibility

A Traffic Impact Assessment has been prepared by Colston Budd Rogers and Kafes and is included at **Appendix P**. This report outlines the relevant traffic and transport matters applicable to the site and the ability of the proposal to comply with the relevant requirements and Australian Standards.

6.7.1 Existing transport network

The site is currently serviced by bus, active transport and the local road network. The site maintains road access to Karne Street North which has footpaths to local bus services. These include route 941 between Hurstville and Bankstown and route 944 between Mortdale to Bankstown. In relation to local cycleways, there is an off-road cycleway south of the M5 Motorway which connects underneath the motorway via Bonds Road, west of the site.

6.7.2 Parking

Residential

The non-discretionary development standards under Clause 107 of the Housing SEPP require a minimum of one space per 15 beds is provided, plus one ambulance bay and one space per two employees on duty at one time.

The development will provide 165 beds and there will be a maximum of 32 employees on duty at one time. The development would therefore require 27 spaces. 30 spaces, inclusive of two disabled parking spaces, are proposed in compliance with this requirement.

In relation to bicycle parking, five (5) bicycle parking spaces are provided at grade for employees and visitors. Employees will also have access to shower and change facilities in the basement level.

Servicing

Vehicular access is proposed to be provided from Karne Street North near the north western corner of the site. Two driveways will be provided, one to the basement car park and service area, and a second to a porte cochere and ambulance bay near the northern elevation of the building.

Ramp grades, parking space dimensions and circulation spaces will allow for front in and front out manoeuvring of vehicles consistent with the requirements of the relevant Australian Standards.

6.7.3 Traffic

Current traffic movements

To assess the traffic impacts of the development, turning movement counts have been undertaken at peak times at the intersection of Martin Street and Karne Street North and Karne Street North and Shorter Avenue.

This analysis demonstrated that Martin Street carried 605 to 810 vehicles per hour two-way during the surveyed morning and afternoon peak hours. Karne Street North (north of Shorter Avenue) and Shorter Avenue carried lower flows of some 385 to 520 vehicles per hour two-way. South of Shorter Avenue and closer to the site, traffic on Karne Street North was less intensive and carried 110 to 115 vehicles per hour two-way.

A SIDRA analysis was carried out to determine the current traffic capacity of these nearby intersections. The analysis found that the roundabouts at the intersections of Karne Street North with Martin Street and Shorter Avenue operate with average delays for all movements of less than 15 seconds per vehicle during peak periods. This represents level of service A/B, a good level of service.

Proposed traffic impacts

Traffic rates for RCF development were 0.18 vehicles per hour per bed during a weekday afternoon peak hours. The proposed development would therefore have a traffic generation of 30 vehicles per hour two-way during weekday peak hours. The traffic and SIDRA modelling carried out concluded the following:

- traffic increases on Martin Street, Shorter Avenue and Karne Street North would be some 10 to 30 vehicles per hour two-way at peak times;

- intersections of Karne Street North with Martin Street and Shorter Avenue would continue to operate with average delays for all movements of less than 15 seconds per vehicle during peak periods. This represents and maintains a level of service A/B, a good level of service; and
- therefore, the surrounding road network will be able to cater for the traffic from the proposed development.

6.7.4 Access

Residential

Within the basement parking area, spaces will be a minimum of 5.4 metres long by 2.5 metres wide, with 5.8 metre wide circulation aisles. The accessible parking space will be 2.4 metres wide, with a 2.4 metre wide adjacent area for wheelchairs. Height clearance in the car park will be 2.2 metres generally, with 2.5 metres above the disabled parking space and higher in the area used by service vehicles in accordance with AS 2890.1:2004 and AS 2890.6:2009.

Servicing

The ramp to the basement will provide a maximum grade of 1:20 for six metres inside the property line, in accordance with the AS 2890.1:2004. A loading area will be provided in the basement, suitable for rigid trucks ranging in size up to 10 metres long, for garbage collection and deliveries. 3.9 metres height clearance will be provided in all areas used by service vehicles. Vehicle swept paths are provided in the traffic assessment.

6.7.5 Construction Traffic Management

The construction methodology, process and staging will be finalised when a builder has been appointed. The Construction Traffic Management Plan (CTMP) will be finalised prior to the commencement of work, taking into account relevant consent conditions. The high level conclusions of the CTMP are as follows:

- During construction, trucks transporting material to the site will be accommodated on the site and in the adjacent on-street works zone. Vehicular access to and from the site will be provided from Karne Street North, via the existing access points.
- The designated truck routes to and from the site are proposed to restrict truck traffic to the main road network through the area. These routes include Canterbury Road, King Georges Road, Bonds Road, Martin Street and Roselands Drive.
- Trucks will enter and exit the site in a forward direction. The construction access driveways will provide appropriate sight lines for construction vehicle access, with regards to the number, type and size of construction vehicles.
- The number of vehicles generated during the various stages of construction is likely to be up to some 30 to 40 construction vehicles per day two-way at peak times. Construction vehicles would include rigid trucks and articulated vehicles.
- This is low traffic generation, equivalent to an average of five trucks per hour over a nine – 11 hour working day. The road network will readily cater for these vehicles.
- Construction worker numbers will vary over the construction period, but would generally be some 10 to 30 workers.

The CTMP is presented below in **Figure 45**:

Figure 45 Construction Traffic Management Plan

6.7.6 Green Travel Plan

A green travel plan will be prepared prior to occupation, which will include the following:

- Identify existing bus routes which stop on Grove Avenue, Shorter Avenue and Karne Street North, including the location of bus stops;
- Encourage public transport by employees and visitors through the provision of information, maps and timetables in a site travel plan;
- Raise awareness of health benefits of walking and cycling (including maps showing walking and cycling routes, including adjacent to and near the site); and
- Encourage cycling by providing secure bicycle parking for employees.

6.8 Biodiversity

The proposed development has been assessed by Travers Bushfire and Ecology who have prepared a BDAR Waiver in **Appendix G**. A portion of the south eastern corner of the site contains land mapped under the Biodiversity Values Map (BV Map).

The majority of the site is cleared, while large trees are located in the south western portion of the site. A site inspection was undertaken on 16 June 2022 over a period of 2.5 hours. This involved identification of vegetation communities on site, searches for threatened flora, and assessment for threatened fauna habitat. This concluded that vegetation within the site is highly disturbed and comprised mostly of planted native vegetation. The absence of any remnant native vegetation within the subject land, and highly managed mid-storey and understorey results in a very low vegetation integrity score of 10.1.

It also found that the mapped BV land is associated with the overhanging E. tereticornis trees that are rooted in the adjoining lot. These trees are mapped by the Sydney Metropolitan Vegetation Mapping as PCT 725, equivalent to the Cooks River Castlereagh Ironbark Forest Endangered Ecological Community.

The proposed development has been designed to avoid both the overhanging trees and the mapped BV land.

The assessment also found the following:

- The site provides very low to no potential habitat for threatened flora and fauna species. Potential habitat for threatened species is limited to a single small hollow and very minor seasonal foraging habitat for nectarivorous species. These habitat features are unlikely to be of importance for any threatened fauna species;
- The site does not contribute any connectivity values within the landscape;
- The proposal will not impact on the movement of threatened species; and
- The proposal is not likely to significantly impact on the ability of flying species to move throughout the locality.

The assessment concludes that the proposal will not cause a significant impact on biodiversity values. In accordance with section 7.9(2) of the *Biodiversity Conservation Act 2016*, a BDAR Waiver was issued by the DPE on 8 November 2022 and accompanies this SSDA application at **Appendix G**.

6.9 Acoustic

An Acoustic Assessment has been prepared by PWNA in **Appendix S** which details the construction and operational noise and vibration impacts on nearby sensitive receivers and outlines the proposed management and mitigation measures.

6.9.1 Noise

Four (4) sensitive noise receivers are located neighbouring the site, to the north, east, west and south west of the site. These are identified in **Figure 46**.

Figure 46 Monitoring locations and nearby receivers

Construction Noise

The noise emissions from construction works have been assessed in accordance with the NSW Environmental Protection Authority 'Noise Policy for Industry' 2017. Pursuant to this policy, the noise levels from all noise sources that is consistent with the general environment has been assessed, which concluded that the predicted combined noise levels have the potential to exceed the internal noise management level when working near a receiver by up to 31 dBA LAeq 15 minutes, dependent on the timing of the works.

Construction Traffic Noise would result in a maximum of a 2db increase in road traffic noise which is considered to be negligible and will be unlikely to have adverse impacts to neighbouring properties.

Operational Noise

With regard to operational noise, the most significant source of noise would arise from mechanical plant. Whilst the locations and number of plant areas are known at this stage, the exact selections and their associated noise level are not. Whilst a detailed acoustic review cannot yet be undertaken at this stage, a high level assessment has been conducted.

For this type of development the following mechanical systems would likely be installed with their associated sound power levels are outlined below.

- Kitchen Exhaust Fan (KEF) - cafe – 75dBA (Lw) per unit.
- Air Conditioning Condensers – Office Areas, Learning Areas, Library etc. – 70dBA (Lw) per unit.
- Toilet Exhaust Fans (TEF) – Bathrooms – 55dBA (Lw)

The following comments are made with regard to these systems:

- It is anticipated that KEF serving the cafe will vertically discharge through the external roof and acoustic treatment to a fan on the discharge (external) side will likely be required. Further details of the acoustic treatment will be formulated during the detailed design phase.
- For toilet exhaust fans exhausting air from bathrooms, it is likely acoustic treatment of the plant items will be required. Further details of the acoustic treatment will be formulated during the detailed design phase.
- For air conditioning condensers, further details of the acoustic treatment will be formulated during the detailed design phase.

6.9.2 Vibration

In order to maintain compliance with the human comfort vibration criterion, it is recommended that the indicative safe distances are maintained:

Table 17 Construction vibration criterion

Plant	Rating	Safe working distance (m)	
		Cosmetic Damage (BS 7385: Part 2 DIN 4150: Part 3)	Human Comfort
Vibratory roller	<50 kN	5	15-20
	<100 kN	6	20
	<200 kN	12	40
	<300 kN	15	100
	>300kN	20	100
Small hydraulic hammer	300kg	2	7
Medium hydraulic hammer	900kg	7	23
Large hydraulic hammer	1600kg	22	73
Vibratory pile driver	Sheet piles	2-20	20
Jackhammer	Hand held	1	Avoid contact with structure and steel reinforcements

The following mitigation measures are proposed for noise and vibration impacts during construction:

- **General management measures:** Introduce best-practice general mitigation measures in the workplace which are aimed at reducing the acoustic impact onto the nearest affected receivers.

- **Project notification:** Issue project updates to stakeholders, discussing overviews of current and upcoming works. Advanced warning of potential disruptions can be included. Content and length to be determined on a project-by-project basis.
- **Verification monitoring**: Monitoring to comprise attended or unattended acoustic surveys. The purpose of the monitoring is to confirm measured levels are consistent with the predictions in the acoustic assessment, and to verify that the mitigation procedures are appropriate for the affected receivers. If the measured levels are higher than those predicted, then the measures will need to be reviewed and the management plan will need to be amended.
- **Compliance management system:** Implement a management system which includes procedures for receiving and addressing complaints from affected stakeholders
- **Specific notification:** Individual letters or phone calls to notify stakeholders that noise levels are likely to exceed noise objectives. Alternatively, contractor could visit stakeholders individually in order to brief them in regards to the noise impact and the mitigation measures that will be implemented.
- **Respite offer:** Offer provided to stakeholders subjected to an ongoing impact.
- **Alternative construction methodology:** Contractor to consider alternative construction options that achieve compliance with relevant criteria. Alternative option to be determined on a case-by-case basis. It is recommended that the selection of the alternative option should also be determined by considering the assessment of on-site measurements (refer to Verification Monitoring above).

Further detail with respect to the mitigation measures is provided in the Acoustic Assessment in **Appendix S**.

6.10 Geotechnical

A Geotechnical Report has been prepared by Geotechnique and is included at **Appendix R**. This report considers the suitability of the site for the proposed development with respect to the geotechnical implications and provides recommendations on the future detailed design of the proposal. 6 boreholes were drilled in a previous assessment in 2017 and a further two boreholes were drilled in a further assessment in 2022.

6.10.1 Soil

The subsurface soil assessment carried out indicates that the soil profile comprises a sequence of topsoil/fill and residual soils underlain by bedrock. The depth to bedrock across the site is likely to vary from about 1.3m to 2.7m from existing ground surface. Subsurface materials include silt, sandy, gravelly silty and shaley clays, with the bedrock being shale and siltstone.

Further assessment carried out indicate that the soils likely to be disturbed and/or excavated are non saline, non-aggressive to steel piles, non-aggressive to mildly aggressive to concrete piles and not acid sulfate soils.

The assessment concludes that the geotechnical conditions across the site do not impost any limitation on the proposed development and the site is suitable, in a geotechnical sense, for the proposed development. This is based on the assumption that excavation and fill placement and design of retaining structures, floor slabs and footings are carried out with the recommendations provided.

The excavation and disturbance of soil can be carried out without a saline soil or acid sulfate soil management plan.

6.10.2 Groundwater

Groundwater was not uncovered on the site from drilling to 3.5m from the existing ground level and the assessment concludes that the groundwater level across the site is deeper than 6.5m below existing ground level. Minor groundwater inflow, if any, can be managed by a conventional sump and pump method.

6.11 Flooding

A Flood Impact Assessment has been prepared by TTW and is included at **Appendix CC**. TTW have assessed the existing and proposed conditions during the 1% AEP and PMF events.

During the 1% AEP, TTW confirm the site is not affected by overland flows from Grove Avenue, however, the overland flows from private properties to the north of the site enter the site via the northern site boundary and traverse the site towards the southern boundary where eventually discharge to Richard Podmore Dog Park. The peak flow entering from the northern site boundary is up to 190 m^3/s in the 1%AEP event.

During the PMF, floodwaters from the northern site boundary are circa 1.8m³/s. These flood depths are generally shallow across the site except for the existing trapped low points where flood depths are up to 0.7m.

As detailed in **Section 6.12**, the proposal will include a drainage swale and flood wall along the northern site boundary, inground drainage pit and pipe system as well as an OSD tank in accordance with Council's requirements. The wall ensures overland flows arriving from the northern site boundary will be contained within the swale and would not overtop onto the site during all storm events up to and including the PMF.

The flood results post-development illustrate that the site is effectively flood free during both the 1% AEP and PMF events and overland flows from the northern site boundary can be redirected to Karne Street North through the proposed drainage system. Further discussion is provided at **Appendix CC**.

6.12 Stormwater

An Integrated Water Management Plan has been prepared by Henry and Hymas and is included in **Appendix T** to outline the WSUD, stormwater and flooding management systems proposed.

An 116m³ OSD tank is proposed within the southern part of the site, which meets Council's stormwater detention requirements for stormwater flows. Stormwater drainage from the site will be provided to Council's systems on Karne Street North to the south west of the site. A grated drain is proposed to the northern boundary of the site to intercept overland flows and direct these flows to the existing stormwater infrastructure on Karne Street North. Pollution control and ocean guard pits are also proposed to address stormwater quality, noting that Council does not include specific controls relating to stormwater quality targets or MUSIC modelling.

These management practices and systems minimise the impact of development on the existing stormwater system in terms of water quality whilst ensuring safe and efficient conveyance of runoff. As the design is in accordance with both Council's requirements and best practice principles, the proposal has minimal stormwater impacts on the site and surrounds.

6.13 Hazards

A Hazardous Materials Survey has been prepared by Trinitas Group and is included in **Appendix X** to identify potentially hazardous materials on the site and assess the risks posed by these materials.

5 medium risk asbestos items, 13 low risk asbestos items, 4 instances of lead in paint and 1 instance of synthetic mineral fibre were found on the site. The following recommendations were made when hazardous materials are identified on the site. These have also been included in the Mitigation Measures at **Attachment 3**.

- Asbestos management:
  - Record information in a site asbestos register, with details provided in the hazardous materials survey;
  - Ensure that a copy of the register is kept on site and updated;
  - Review the asbestos register and risk assessment every 12 months, or earlier;
  - Development and maintain an asbestos management plan, with details provided in the hazardous materials survey;
  - Identify areas of no access which are presumed to contain asbestos containing material; and
  - Ensure all asbestos-containing materials remaining in-situ are labelled appropriately to warn of the dangers of disturbing these materials.
- Synthetic Mineral Fibres (SMF)
  - Synthetic Mineral Fibre (SMF) materials should be removed under controlled conditions prior to demolition /refurbishment works, in accordance with the requirements of the Code of Practice for the Safe Use of Synthetic Mineral Fibres [NOHSC:2006(1990)].
- Lead Paint
  - All identified lead-based paint systems should be maintained in good condition. Any works on lead-based paint systems likely to create dust, fumes or mist should be undertaken in accordance with AS 4361.2-1998 Guide to Lead Paint Management Part 2: Residential and Commercial Buildings.
- Polychlorinated Biphenyls (PCBs)

- Capacitors and electrical components identified as containing Polychlorinated Biphenyls (PCBs) should be deenergised by a licensed electrician and removed under controlled conditions and disposed of in accordance with environmental protection guidelines prior to refurbishment or demolition works.

- Ozone Depleting Substances (ODSs)
  - Details of management of ODSs are provided in the hazardous materials survey.

6.14 Contamination

A Detailed Site Investigation (DSI) has been prepared by Geotechnique and is included at **Appendix U**. The objectives of the assessment are to ascertain if the proposal presents a risk of harm to human health and to determine the suitability of the site for the proposal under Chapter 4 of the Resilience and Hazards SEPP. A Phase 1 Preliminary Site Assessment was prepared in 2017 which found that the site has potential for contamination due to historical and present site activities.

This DSI assessment found that the boreholes and test pits did not uncover visual evidence of asbestos or other indicators of significant contamination, with the exception of singular fibro-cement pieces at four borehole locations.

The laboratory test results identified that contaminants are either not present (i.e. at levels less than laboratory limits of reporting or do not pose a risk of hazard to human health), with the exception of asbestos at borehole BH120. BH120 is located in the rear yard of 67 Karne Street North, near the proposed location of the driveway.

The assessment concluded that the site is suitable for the proposal, subject with the following recommendations:

- Detailed sampling and/or testing in BH120 to delineate the extent of asbestos contamination;
- Sampling and testing of soils underneath the houses, building and concrete covered areas after demolition and removal of site features;
- Development of a Remediation Action Plan to remediate asbestos contaminated fill, plus other contamination identified through the additional sampling and testing.

6.14.1 Remediation

An Additional Contamination Assessment (ACA) and Remedial Action Plan (RAP) has been prepared by Geotechnique in **Appendix U**. The objective of the ACA was to delineate the extent of previously identified asbestos contamination and the RAP aims to provide methods of remediation that can be implemented and validated so that a statement can be made declaring the site environmentally suitable for the proposed development.

Based on this and previous environmental assessments of the site, four locations within the site contain asbestos and contaminated fill materials. As such, remediation is considered necessary to make the site suitable for the proposal. One area to the rear of the current dwelling house on 67 Karnes Street North is identified to be remediated identified below in **Figure 47**.

Figure 47 Area to be remediated

The waste must be disposed as Asbestos Waste at a licensed landfill facility which will meet their licence requirement to receive Asbestos Waste. Removal and/or disposal of the waste must be carried out in accordance with the requirements of the regulators, such as NSW EPA and SafeWork NSW.

After completion of the remediation works, validation must be carried out in accordance with the RAP. A validation report will be then prepared on the suitability of the site for the proposed aged care facility development.

Based on this assessment, the site is considered suitable for the proposed aged care facility development subject to implementation of the following recommendations, prior to earthworks:

- Sampling and testing of soils beneath the houses, building, and concrete covered areas after demolition and removal of site features.
- Revision of the RAP, if required, to remediate any other contamination that might be identified through the recommended additional sampling and testing, followed by appropriate validation. If no other contamination is detected beneath the site features after removal, carry out appropriate remediation and validation of only Area 1.
- A validation report will be produced at completion of successful remediation by the appointed environmental consultant. The format of the report will follow that recommended in the NSW Environment Protection Authority (EPA), "Consultants Reporting on Contaminated Land" – 2020.

Based on the available information and nature of identified contamination, the RAP concludes that a preliminary long term environmental management plan is not likely to be required after successful remediation and validation as the contaminated asbestos soil will be removed from the site as a part of remediation works.

6.15 Waste

6.15.1 Demolition and Construction

The Construction and Demolition Waste Management Plan (CDWMP) has been prepared by Elephants Foot in **Appendix W** which outlines waste management processes adopted during the construction and demolition process of the proposal. The CDWMP identifies stakeholder roles and responsibilities, the management of excavation and hazardous waste and outlines demolition and construction waste volumes and management.

The CDWMP estimates that 99.1% of construction waste will be diverted from landfill. The proposal will generate approximately 385m^3 of construction waste, with most waste able to be recycled. Site specific operational measures and design specifications for waste management facilities will be adopted to ensure that the outcomes of the CDWMP will be met.

6.15.2 Operation

The Operational Waste Management Plan has been prepared by UFD in **Appendix V**. The assessment of the proposal including proposed land uses and the facilities provided on site conclude that the proposal will generate the following amounts of waste per day:

- 1351 litres of general waste;
- 593 litres of recycling; and
- 31 litres of medical and hazardous waste;

Waste is removed by a private contractor from the basement loading area at least twice a week. The waste and bin requirements of the proposal are detailed in **Table 18** below.

Table 18 Required waste specifics

Bin Type	Bin size / capacity	Bin numbers	Pick up frequency (per week)
General waste	1,100 litres	5	2 times
Recycled waste	1,100 litres	2	2 times
Medical waste	120 litres	2	1 time
Cytotoxic waste	120 litres	2	1 time
Secured paper waste	240 litres	1	As volume dictates
Fluid waste	1265mm x 645mm bunded pallet	1	As volume dictates

Based on the above waste generation rates, bin sizes and collection frequencies, a 45m^2 waste storage area is required in the basement with a clear path of travel to the loading area. This area and path is provided in the basement.

Opal staff will be responsible for the management and disposal of waste into the waste holding areas. The OWMP includes recommendations for waste management processes to be adopted during the operation of the proposal and for construction details to be included to the design of the waste holding area.

The assessment concludes that the proposal is capable of appropriately managing waste for the operation of the proposed RCF.

6.16 Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Dominic Steele Consulting Archaeology in **Appendix H** to identify and understand the Aboriginal cultural heritage values within the site. This assessment also identifies whether there are potential impacts to Aboriginal cultural heritage values that may result from the proposal.

In relation to archaeological heritage, the assessment identifies that previous building activity has regraded the site removing topsoil which has the potential to contain artifacts of Aboriginal cultural significance. As a result, the site has no soils with potential to contain Aboriginal objects and the site has no archaeological sensitivity.

There are no recorded Aboriginal historical associations with the site or surrounds and because of impacts from the previous use of the site, the site retains no potential to contain Aboriginal cultural heritage (Aboriginal objects/archaeological deposits).

6.17 Social Impact Assessment

A Social Impact Assessment (SIA) has been prepared by Ethos Urban and is included at **Appendix K**. This SIA has been prepared in accordance with the *Social Impact Assessment Guideline for State Significant Projects (2021)*. The purpose

of the SIA is to identify, predict, and evaluate likely social impacts arising from a project and propose responses to the predicted impacts.

The SIA identifies that some impacts are associated with the proposal which arise from temporary changes to environment, wellbeing and amenity from the dust, noise and vibration generated from the construction process, increased traffic from construction and operation of the RCF and permanent changes to the character of the surroundings resulting from the development of mostly vacant lot.

However, the SIA finds that the positive social impacts of the proposal outweigh other impacts, which can be managed during construction and operation. The key significant social benefits of the proposal include:

- Improved access to healthcare within, and improved outcomes for the Narwee community associated with the delivery of the new, high-quality infrastructure and services on site to meet an aging population for the site and surrounds, including the broader NSW residents.
- Positive benefits to livelihoods associated with the provision of construction and operational jobs on site for the Narwee Parklands Care Community, contributing to the '30-minute city' vision for the Sydney region.
- Positive social benefits for future residents with the delivery of a high quality, innovative care community, with ample outdoor landscaped areas, to achieve high levels of wellbeing and health for future residents. The design of the future building is aligned with the outcomes of community engagement, and incorporates green space, flexible rooms, indoor and outdoor spaces and private spaces.

6.18 Economic Impact Assessment

An Economic Impact Assessment has been prepared by Ethos Urban and is included at **Appendix L**.

The assessment analyses the demand for residential care facilities within the local catchment area and the City of Canterbury-Bankstown LGA. The catchment area is shown at **Figure 48** below.

Within the catchment area, the study finds that residents are likely to be aged over 70+ and household compositions have changed from a share or family household to an increase in lone persons households. Overall, trends between the 2016 to 2021 Census indicate that the population is ageing, and households are becoming smaller. This highlights that demographic drivers and trends underway indicate that the local population would associate strongly with a greater options for seniors living, including residential age care.

Critically, the study also found that there is a significant undersupply of residential aged care beds in the LGA from 2022-2031. Even with the beds provided by the proposal, the LGA is forecast to have an undersupply of 810 aged care beds in 2031 (compared to an existing undersupply of 260 and 500 beds in 2022 and 2026 respectively). This indicates that the provision of the proposed 165 aged care beds would meet a significant portion of the future demand for RCF housing in the area.

The economic analysis finds that the proposed development will:

- Support the demand for aged care living by providing modern and high quality RCF that will enable local residents to receive care while staying with local community and close to family, and social and cultural networks;
- Assist in meeting a forecast under supply of beds by 2031 (in both the catchment and the City of Canterbury-Bankstown LGA) and contribute to choice in aged care providers and minimising wait times for the placement for senior residents requiring aged care services. The project will assist in providing supply to address long-term undersupply;
- Improved health and wellbeing associated with the delivery of an RCF. This will increase access to aged care for those in need, particularly for those who do not yet require full time care but will benefit from access to Opal services in the future. This is in alignment with state and local policy objectives for 'ageing in place';
- Improve quality of residential aged care supply through the development of a modern RCF;
- Support the provision of a range of new employment opportunities within a within the aged care sector in an accessible location and within a modern RCF that meets the contemporary needs of aged care residents and is well placed to support the evolving needs of residents;
- Increase the provision of high quality residential aged care beds within the local area which is currently characterised by dated stock that offers low levels of resident amenity;
- Greater utilisation of a vacant and underutilised site;

- Align with the objectives of State and Local Government which seek to provide the following:
  - Support a 30-minute city by providing housing, jobs and critical social infrastructure within proximity to public transport; and
  - Deliver additional housing supply in the local area to support continued population growth of this region.

Further discussion is provided at **Appendix L**.

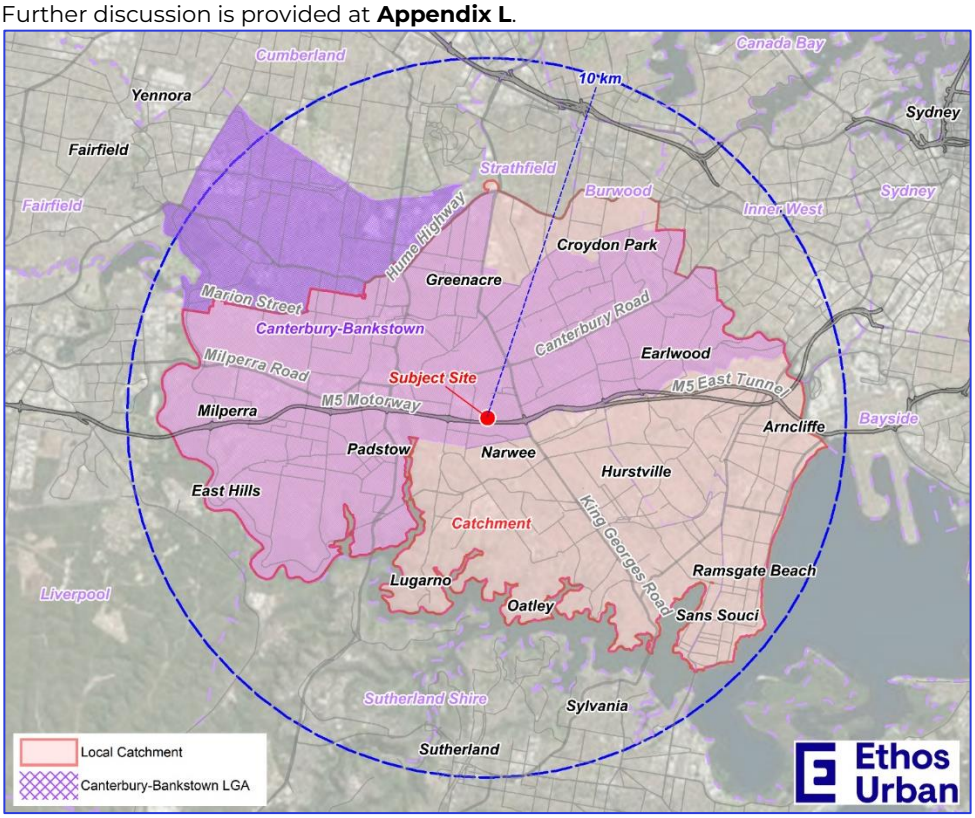


Figure 48 Study area

Source: Ethos Urban

6.19 Infrastructure Requirements

An Infrastructure Assessment Report has been prepared by Donnelley Simpson Cleary in **Appendix O** outlining the existing and proposed infrastructure requirements to the site. The site maintains existing unencumbered infrastructure connections to the electrical grid (Ausgrid), telecommunications (Telstra), internet (NBN Co), Gas (Jemena) and water (Sydney Water). The proposal involves the following augmentation to utilities:

- Electricity (Ausgrid): A maximum demand has been calculated for the site and an Application for Connection will be submitted by the appointed ASP3 to Ausgrid. A substation is provided within the site near the Karne Street North boundary;
- Telecommunications (Telstra): The NBN uses the Telstra pit and pipe infrastructure in the area to deliver their services. Therefore, application will be made through NBN Co. during the detailed design phase of the project requesting an appropriate service to meet the operational needs along with notification of the required disconnections and possible re-alignment of pit and pipe infrastructure to suit new driveway access;
- Internet (NBN Co): NBN Co. – A connection application will be made to NBN Co. during the detailed design phase of the project requesting an appropriate service to meet the operational needs of the proposal along with notification of the required disconnections only and possible re-alignment of pit and pipe infrastructure to suit new driveway access. The area is serviced with fibre to the curb (FTTC) with the possibility of upgrade to fibre to the premises (FTTP).
- Gas (Jemena): A new gas supply is proposed and will connect to the existing network infrastructure on Karne Street North. An application will be made to Jemena once the gas loads are confirmed.
- Water (Sydney Water) Water mains are located on Karne Street North. A Section 73 Application to Sydney Water will be made to confirm water supply for the proposed development.

6.20 BCA Compliance

A BCA Assessment has been prepared by Formiga1 and is included at **Appendix M** to review the capability of the proposed design to meet the requirements of the Building Code of Australia (BCA). Overall, it is considered that the design is generally capable of meeting the demand to satisfy provisions and performance requirements of the BCA.

6.21 Development Contributions

The proposal is for a residential care facility which is identified as a type of 'residential development that will result in a net increase in residents' under the Canterbury-Bankstown Local Infrastructure Contributions Plan 2022 (BC Contributions Plan 2022). Opal intend to pay Section 7.11 development contributions pursuant to the Ministers 94E directions to be levied under the BC Contributions Plan 2022.

7.0 Project Justification

In general, investment in major projects can only be justified if the benefits of doing so exceed the costs. Such an assessment must consider all costs and benefits, and not simply those that can be easily quantified. As a result, the EP&A Act specified that such a justification must be made having regard to biophysical, economic and social considerations and the principles of ecologically sustainable development.

This means that the decision on whether a project can proceed or not needs to be made in the full knowledge of its effects, both positive and negative, whether those impacts can be quantified or not.

The proposed development involves the delivery of a new seniors housing development, including a residential care facility. The assessment must, therefore, focus on the identification and appraisal of the effects of the proposed change over the site's existing condition.

Various components of the biophysical, social and economic environments, as well as the proposal's alignment with the objects of the EP&A Act and other statutory instruments applicable to the site, have been examined in this EIS and are summarised below.

7.1 Ecologically Sustainable Development

The EP&A Regulation lists four principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle.
- Intergenerational equity.
- Conservation of biological diversity and ecological integrity.
- Improved valuation and pricing of environmental resources.

An analysis of these principles is provided below.

Precautionary Principle

The precautionary principle is utilised when uncertainty exists about potential environmental impacts. It provides that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. The precautionary principle requires careful evaluation of potential impacts in order to avoid, wherever practicable, serious or irreversible damage to the environment.

This EIS and its supporting reports and studies has not identified any serious threat of irreversible damage to the environment and therefore, the precautionary principle is not relevant to the proposal.

Intergenerational Equity

Intergenerational equity is concerned with ensuring that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. The proposal has been designed to benefit both the existing and future generations by:

- Ensuring the health, diversity and productivity of the environment are maintained through the implementation of passive and active design measures that reduce operational energy and water use from the project.
- Providing a high quality, modern aged care facility for seniors' citizens to live, socialise and thrive close to their existing networks;
- Reducing energy, water and waste to ensure that the health, diversity and productivity of the environment is maintained for the benefit of future generations.
- Implementing safeguards and management measures to protect environmental values.
- Facilitating job creation in close proximity to homes and public transport.

The proposal has integrated short and long-term social, financial and environmental considerations so that any foreseeable impacts are not left to be addressed by future generations. Issues with potential long-term implications such as waste disposal would be avoided and/or minimised through construction planning and the application of safeguards and management measures described in this EIS and the appended technical reports.

Conservation of biological diversity and ecological integrity

The principle of biological diversity upholds that the conservation of biological diversity and ecological integrity should be a fundamental consideration. The proposal would not have any significant effect on the biological diversity and ecological integrity of the study area.

Improved valuation, pricing and incentive mechanisms

The principles of improved valuation and pricing of environmental resources requires consideration of all environmental resources which may be affected by a proposal, including air, water, land and living things. Mitigation measures for avoiding, reusing, recycling and managing waste during construction and operation would be implemented to ensure resources are used responsibly in the first instance.

Additional measures will be implemented to ensure no environmental resources in the locality are adversely impacted during the construction or operational phases.

7.2 Environmental Planning and Assessment Act 1979 – Objects of the Act

This EIS has examined and considered all possible matters affecting or that are likely to affect the environment by reason of the proposed development. The project is consistent with the relevant Objects of the EP&A Act, as outlined in **Section 5.0**, and will not result in any unjust or significant environmental impact.

7.3 Environmental Planning and Assessment Act 1979 – Clause 4.15 Evaluation

The following section assesses the proposal against the relevant heads of consideration listed in Section 4.15 of the EP&A Act.

7.3.1 Environmental Planning Instruments

As described in **Section 5.0**, the proposal is consistent with all relevant EPIs relating to the site, including:

- Environmental Protection and Biodiversity Conservation Act 1999.
- Environmental Planning and Assessment Act 1979.
- Biodiversity Conservation Act 2016.
- 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 (Industry and Employment) 2021.
- State Environmental Planning Policy (Resilience and Hazards) 2021.
- Canterbury Local Environmental Plan 2012.

The Statutory Compliance Table at **Attachment B** outlines the relevant statutory requirements of each EPI and the location in the EIS where those requirements have been assessed. Those statutory requirements that are yet to be assessed in the EIS are addressed below.

7.3.2 EP&A Regulations

This EIS report has addressed the specification criteria within Section 190 and 192 of the EP&A Regulation. Similarly, the EIS has addressed the principles of ecologically sustainable development through the precautionary principle (and other considerations), which assesses the threats of any serious or irreversible environmental damage (see above). As required by Section 4.42 of the EP&A Act, no additional approvals will be required at this stage to enable the project.

7.3.3 Likely Impacts of Development

Social and Economic

An assessment of the likely social and economic impacts of the project has been undertaken in the Social Impact Assessment at **Appendix K** of the EIS, prepared in accordance with the Social Impact Assessment Guidelines 2021. The assessment confirms that the proposal has the potential to result in both positive and negative impacts. The identified negative impacts are primarily in relation to the construction and built form impacts of the proposed development. However, these can be managed through the development of a Construction Management Plan, the adoption of the various construction recommendations identified in the acoustic assessment and the carefully considered design of the proposal. The identified positive impacts range from short-term to long-term and will have a positive contribution to housing affordability and diversity for the increasing elderly population within the City Canterbury-Bankstown, allowing for senior citizens to age in place.

Further, the proposal will support approximately 300 construction jobs and 180 jobs during the operational phase. It will have an estimated direct value-add to the economy of $60 million. These forecast outcomes for the construction phase are derived from established methodological approaches and measures, which are outlined within the Economic Impact Statement prepared by Ethos Urban at **Appendix L**.

Overall, the redevelopment of the site for the proposed seniors housing development, if impacts associated with accessibility are well mitigated, will ensure positive social outcomes for the broader community.

Biophysical

The EIS for the proposed development has demonstrated that the proposal adopts appropriate management strategies and will generate limited environmental impacts, due to the existing context of the site. The development will not have a significant impact on any threatened flora or fauna species and it will not result in any adverse impacts to the biodiversity mapped area to the south of the site. Further detail is provided at **Section 6.8** and **Appendix G**.

7.3.4 Suitability of the Site

Having regard to the characteristics of the site and its location, the proposed development is suitable for the site as:

- The site can appropriately accommodate the proposed development while balancing environmental and design considerations and preserving the amenity of neighbouring properties;
- It will cater for the ageing population and provide capacity for existing residents in the local community to age in place and provide an increased supply and diversity of housing that meets the needs of seniors and those in need of care in Narwee and the City of Canterbury- Bankstown more widely;
- It will provide a built form that has been architecturally designed to respond and be commensurate with the surrounding environment;
- The architectural design will deliver a high quality and modern RCF, which will support a safe and secure seniors living and care environment;
- On-site services and facilities will be provided on site to serve residents and a regular shuttle bus services will operate to provide daily trips to nearby centres;
- The site will provide important infrastructure to service the local and regional area; and
- The technical assessments prepared in support of the proposal have concluded that the site can be made suitable for the proposed development.

7.3.5 Public Interest

The proposed development is in the public interest for the following reasons:

- It will contribute to meeting the strategic need for additional housing diversity including the provision of seniors housing in an accessible location, allowing seniors to age in place near their existing support networks;
- It will assist in meeting a forecast under supply of beds by 2031 in the City of Canterbury-Bankstown LGA and wider catchment area, and contribute to choice in aged care providers and minimising wait times for the placement for senior residents requiring aged care services and who wish to continue to live in the area as discussed in the Economic Impact Assessment at **Appendix L**;
- It replaces the former seniors housing on the site prior to 2017 and proposes a contemporary, high amenity RCF with support services and facilities that meets modern day standards, which provides opportunities for residents to age in place and accommodate a continuum of care;
- It will include a number of outdoor open spaces to allow residents, staff, visitors and the community to congregate and increase activation and amenity in the area. These areas will provide opportunities for the environment to provide natural stimuli to residents;
- Provide numerous onsite services and communal open space to enable social interaction amongst residents;
- Increase the provision of community services and connections to the community; and
- Provide significant investment in the seniors housing sector within the City of Canterbury- Bankstown that will provide both construction and operational employment opportunities.

8.0 Conclusion

This Environmental Impact Statement (EIS) has been prepared to consider the environmental, social and economic impacts of the proposed seniors housing development. The EIS has addressed the issues outlined in the SEARs (**Attachment A**) and accords with Part 8 of the EP&A Regulations with regards to consideration of the relevant environmental planning instruments, built form, and social and environmental impacts resulting from the proposed development. Appropriate mitigation measures have been identified to manage the impacts of the development through the construction and operational phases of the project.

The project is identified as having strategic merit, by delivering a contemporary and high-quality seniors housing development, comprising 165 residential care facility beds and onsite services and facilities. It is consistent with the objectives of the strategic planning framework and specifically, the South District Plan.

Having regard to the biophysical, economic and social considerations including the principles of ecologically sustainable development, the carrying out of the project is justified for the following reasons:

- The proposal will meet a forecast under supply of aged care beds by 2031 in Canterbury-Bankstown and contribute to choice in aged care providers and minimising wait times for the placement for senior residents requiring aged care services and who wish to continue to live in the area;
- The proposal will improve access to healthcare within, and improved outcomes for the Narwee community associated with the delivery of the new, high-quality infrastructure and services on site to meet an ageing population for the site and surrounds, including the broader NSW residents;
- The proposal has been carefully designed to provide a contextual response to the site setting and minimise perceived bulk and scale impacts to adjoining properties;
- The proposed contemporary and modern built form and urban design will significantly improve the quality of seniors housing stock within the City of Canterbury-Bankstown;
- The proposed development provides a high quality architectural design that will contribute to a safe, secure and active environment;
- The proposed development is entirely consistent with the aims and objectives of the relevant strategic planning framework, particularly the South District Plan by increasing the supply of seniors housing commensurate to forecasted demand in the catchment and LGA;
- The proposal represents a significant investment opportunity where it will provide a modern residential care facility and will deliver approximately 300 construction jobs and 180 jobs during the operational phase;
- The proposal will facilitate the delivery of new landscaped areas, tree planting and an improved public domain interface, including consideration of the biodiversity values in the eastern portion of the site;
- The assessment of the proposal has demonstrated that the development will not result in any environmental impacts that cannot be appropriately managed, consistent with the relevant planning controls for the site; and
- The proposal is consistent with the principles of ecological sustainable development as defined by Section 190 of the *Environmental Planning and Assessment Regulation 2021*.

Given the merits described above, and the significant benefits associated with the proposed development, it is requested that the application be approved.

Attachment 1 – SEARs Compliance Table

This SEARs compliance table shows where the SEARs have been addressed in the EIS.

Issue and Assessment Requirements	Relevant EIS Section	Relevant Appendix
1. Statutory Context • Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies and guidelines. • Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. • If the development is only partly State significant development (SSD) declared under Chapter 2 of SEPP (Planning Systems) 2021, provide an explanation of how the remainder of the development is sufficiently related to the component that is SSD. • Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.	Section 1.4.2, Section 2.5, Section 5.3.1, Section 5.6, Section 6.1.2, Section 6.1.3	Appendix BB
2. Capital Investment Value and Employment • Provide a detailed calculation of the capital investment value (CIV) of the development, prepared by a qualified quantity surveyor. • Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided.	CIV Statement provided under separate cover	Appendix L
3. Design Quality • Demonstrate how the development achieves: - design excellence in accordance with any applicable EPI provisions. - good design in accordance with the seven objectives for good design in *Better Place*. • Where required by an EPI or concept approval, or where proposed, demonstrate how the development has been subject to a competitive design process, carried out in accordance with an endorsed brief and Design Excellence Strategy. Recommendations (from the jury or Design Integrity Panel) are to be addressed prior to lodgement. • In all other instances, demonstrate that the development has been reviewed by the State Design Review Panel (SDRP). Recommendations are to be addressed prior to lodgement.	Section 2.5, Section 4.2, Section 5.6	Appendix B Appendix C
4. Built Form and Urban Design • Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. • Demonstrate how: - the development considers the design principles in Part 5, Division 6 of *State Environmental Planning Policy (Housing) 2021* and the *Seniors Housing Guidelines 2021*. - the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. - The building design will deliver a high-quality development, including consideration of façade design, articulation, activation, roof design, materials, finishes, colours, any signage and integration of services. • Assess how the development complies with the relevant accessibility requirements.	Section 2.3, Section 2.4, Section 3.1, Section 3.4, Section 3.5, Section 3.6, Section 3.8, Section 5.6, Section 6.1, Section 6.7.4	Appendix A Appendix B Appendix C Appendix N
5. Environmental Amenity • Address how good internal and external environmental amenity is achieved, including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces. • Assess amenity impacts on the surrounding locality, including lighting impacts, reflectivity, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts. A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated, • Provide a solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development (if relevant).	Section 6.1, Section 6.2.1, Section 6.2.2, Section 6.3, Section 6.4 Section 6.5	Appendix A Appendix B Appendix E

Issue and Assessment Requirements	Relevant EIS Section	Relevant Appendix
• For any applicable parts of the development, provide an assessment against SEPP 65 and the *Apartment Design Guideline*.		
6. Visual Impact • Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. • Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment.	Section 6.3	Appendix B
7. Public Space • Demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department. • Demonstrate how the development: - ensures that public space is welcoming, attractive and accessible for all. - maximises permeability and connectivity. - maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection. - maximises street activation. - minimises potential vehicle, bicycle and pedestrian conflicts. • Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with *Crime Prevention and the Assessment of Development Applications Guidelines*.	Section 3.8, Section 6.1.2, Section 6.1.3, Section 6.1.4, Section 6.2, Section 6.4, Section 6.5	Appendix A Appendix B Appendix P Appendix Z
8. Trees and Landscaping • Assess the number, location, condition and significance of trees to be removed and retained and note any existing canopy coverage to be retained on-site. • Provide a detailed site-wide landscape plan, that: - details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy cover. - provides evidence that opportunities to retain significant trees have been explored and/or informs the plan. - demonstrates how the proposed development would: - contribute to long term landscape setting in respect of the site and streetscape. - mitigate the urban heat island effect and ensure appropriate comfort levels on-site. - contribute to the objective of increased urban tree canopy cover. - maximise opportunities for green infrastructure, consistent with *Greener Places*.	Section 3.2, Section 3.8, Section 6.5	Appendix E Appendix H Appendix Q
9. Ecologically Sustainable Development (ESD) • Identify how ESD principles (as defined in in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. • Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards. • Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government's goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources.	Section 3.11, Section 6.6	Appendix Q
10. Traffic, Transport and Accessibility • Provide a transport and accessibility impact assessment, which includes: - an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections. - details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances, and an explanation of how residents will access facilities and services), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading. - analysis of the impacts of the proposed development (including justification for the methodology used), including predicted modal split, a forecast of additional	Section 6.7	Appendix P Appendix T

Issue and Assessment Requirements	Relevant EIS Section	Relevant Appendix
daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict) and any cumulative impact from surrounding approved developments. - measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms of delivery (including proposed arrangements with local councils or government agencies) of any infrastructure improvements in accordance with relevant standards. - proposals to promote sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high-quality end-of-trip facilities, and implementing a Green Travel Plan. • Provide a Construction Traffic Management Plan detailing predicted construction vehicle movements, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated.		
11. Biodiversity • Assess any biodiversity impacts associated with the development in accordance with the *Biodiversity Conservation Act 2016* and the Biodiversity Assessment Method 2020, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land. • If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification.	Section 6.8	Appendix G
12. Noise and Vibration • Provide a noise and vibration assessment prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures and outline the proposed management and mitigation measures that would be implemented.	Section 6.9	Appendix S
13. Ground and Water Conditions • Provide an assessment of the potential impacts on soil resources, including related infrastructure and riparian lands on and near the site. • Provide an assessment of the potential impacts on surface and groundwater resources (quality and quantity), including related infrastructure, hydrology, aquatic and groundwater dependent ecosystems, drainage lines, downstream assets and watercourses. • Provide an assessment of salinity and acid sulfate soil impacts.	Section 6.10	Appendix R
14. Stormwater and Wastewater • Provide an Integrated Water Management Plan for the development that: - is prepared in consultation with the local council and any other relevant drainage or water authority. - details the proposed drainage design for the site including any on-site treatment, reuse and detention facilities, water quality management measures, and the nominated discharge points. - demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse impacts on any downstream properties. • Where drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards, the local council or other drainage or water authority.	Section 6.11	Appendix T Appendix AA
15. Flooding Risk • Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the *NSW Floodplain Development Manual*.	Section 6.12	Appendix T Appendix CC

Issue and Assessment Requirements	Relevant EIS Section	Relevant Appendix
• Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required.		
16. Hazards and Risks • Where there are dangerous goods and hazardous materials associated with the development provide a preliminary risk screening in accordance with Chapter 3 of SEPP (Resilience and Hazards) 2021. • Where required by SEPP (Resilience and Hazards) 2021, provide a Preliminary Hazard Analysis prepared in accordance with *Hazardous Industry Planning Advisory Paper No.6 –Guidelines for Hazard Analysis*. • If the development is adjacent to or on land in a pipeline corridor, report on consultation outcomes with the operator of the pipeline, and prepare a hazard analysis.	Section 5.6 Section 6.13	Appendix X
17. Contamination and Remediation • In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable after remediation) for the development.	Section 5.6, Section 6.14	Appendix U
18. Waste Management • Identify, quantify and classify the likely waste streams to be generated during construction and operation. • Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. • Identify appropriate servicing arrangements for the site. • If buildings are proposed to be demolished or altered, provide a hazardous materials survey.	Section 3.10, Section 6.13, Section 6.15	Appendix V Appendix W Appendix X
19. Aboriginal Cultural Heritage • Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site.	Section 6.5	Appendix N
20. Environmental Heritage • Where there is potential for direct or indirect impacts on the heritage significance of environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated.	Section 6.16	Appendix H Appendix I Appendix J Appendix EE
21. Social Impact • Provide a Social Impact Assessment prepared in accordance with the *Social Impact Assessment Guidelines for State Significant Projects.*	Section 6.17	Appendix K
22. Infrastructure Requirements and Utilities • In consultation with relevant service providers: - assess the impacts of the development on existing utility infrastructure and service provider assets surrounding the site. - identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. - provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the development.	Section 3.3, Section 6.19	Appendix O
23. Bush Fire Risk • If the development is on bush fire prone land, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with *Planning for Bush Fire Protection.*	N/A	-
24. Aviation • If the development proposes a helicopter landing site (HLS), assess its potential impacts on the flight paths of any nearby airport, airfield or HLS. • If the site contains or is adjacent to a HLS, assess the impacts of the development on that HLS.	N/A	-
25. Construction, Operation and Staging	N/A	-

Issue and Assessment Requirements	Relevant EIS Section	Relevant Appendix
• If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated.		
26. Contributions and Public Benefit • Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit. • Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided.	Section 6.21	-
27. Engagement • Detail engagement undertaken and demonstrate how it was consistent with the *Undertaking Engagement Guidelines for State Significant Projects*. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: - the relevant Department assessment team. - any relevant local councils. - any relevant agencies (including the Western Parkland City Authority for development within the Western Parkland City). - the community. - if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation.	Section 4.0	Appendix Y

Attachment 2 – Statutory Compliance Table

Statutory Requirements	Report / EIS	Technical Study
Commonwealth Acts of Parliament		
Environmental Protection and Biodiversity Conservation Act 1999		
Section 136 General Considerations		
1) In deciding whether or not to approve the taking of an action, and what conditions to attach an approval, the Minister must consider the following, so far as they are not inconsistent with any other requirement of this Subdivision: (a) Matters relevant to any matter protected by a provision of Part 3 that the Minister has decided is a controlling provision for the action (b) Economic and social matters	N/A	
2) In considering those matters, the Minister must take into account: (a) the principles of ecologically sustainable development; and	N/A	
(b) the assessment report (if any) relating to the action.	N/A	
Section 139 Requirements for decisions about threatened species and endangered communities		
1) In deciding whether or not to approve for the purposes of a subsection of section 18 or section 18A the taking of an action, and what conditions to attach to such an approval, the Minister must not act inconsistently with: (a) Australians obligations under: (i) The Biodiversity Convention; or (ii) The Apia Convention; or (iii) CITES; or (b) A recovery plan or threat abatement plan.	Section 5.4.2	Appendix G
2) If: (a) the Minister is considering whether to approve, for the purposes of a subsection of section 18 or section 18A, the taking of an action; and (b) the action has or will have, or is likely to have, a significant impact on a particular listed threatened species or a particular listed threatened ecological community; the Minister must, in deciding whether to so approve the taking of the action, have regard to any approved conservation advice for the species or community	Section 5.4.2	Appendix G
NSW Acts of Parliament		
Environmental Planning and Assessment Act 1979		
Section 1.3 Objects of the Act		
(a) to promote the social and economic welfare of the community and a better environment by the proper management, development and conservation of the State's natural and other resources, (b) to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment (c) to promote the orderly and economic use and development of land, (d) to promote the delivery and maintenance of affordable housing, (e) to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats (f) to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage), (g) to promote good design and amenity of the built environment, (h) to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants, (i) to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State, (j) to provide increased opportunity for community participation in environmental planning and assessment.	Section 7.2	EIS

Statutory Requirements	Report / EIS	Technical Study
Section 4.15 Evaluation		
1) Matters for consideration—general In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application— (a) the provisions of— (i) any environmental planning instrument, and	Section 7.3	EIS
(ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Planning Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and	Section 7.3	EIS
(iii) any development control plan, and	Section 5.6	Appendix DD
(iiia) any planning agreement that has been entered into under section 7.4, or any draft planning agreement that a developer has offered to enter into under section 7.4, and	Section 5.0	EIS
(iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph),that apply to the land to which the development application relates,	Section 5.0	EIS
(b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	Section 7.3.3	EIS
(c) the suitability of the site for the development,	Section 7.3.4	EIS Appendix U
(d) any submissions made in accordance with this Act or the regulations	Public consultation is expected to be carried out by DPE on the submitted development application. Any submissions received as a result are for DPE's consideration in its assessment of the application against applicable plans and policies.	
(e) the public interest	Section 7.3.5	
Biodiversity Conservation Act		
2) The Minister for Planning, when determining in accordance with the Environmental Planning and Assessment Act 1979 any such application, is to take into consideration under that Act the likely impact of the proposed development on biodiversity values as assessed in the biodiversity development assessment report. The Minister for Planning may (but is not required to) further consider under that Act the likely impact of the proposed development on biodiversity values	Section 5.5	Appendix G
3) If the Minister for Planning is of the opinion that proposed State significant development or State significant infrastructure that is the subject of an application to which this Division applies is likely to have serious and irreversible impacts on biodiversity values, the Minister— (a) is required to take those impacts into consideration, and (b) is required to determine whether there are any additional and appropriate measures that will minimise those impacts if consent or approval is to be granted	Section 5.5	Appendix G
NSW EPIs		
State Environmental Planning Policy (Housing) 2021		
Section 84 – Development Standards – General		
(1) This section applies to development for the purposes of seniors housing involving the erection of a building.	Section 5.6.1	EIS
(2) Development consent must not be granted for development to which this section applies unless—	Section 5.6.1	Appendix A Appendix BB

Statutory Requirements	Report / EIS	Technical Study
(a) The site area of the development is at least 1,000m^2, and (b) the frontage of the site area of the development is at least 20m measured at the building line, and (c) for development on land in a residential zone where residential flat buildings are not permitted— (i) the development will not result in a building with a height of more than 9.5m, excluding servicing equipment on the roof of the building, and (ii) if the roof of the building contains servicing equipment resulting in the building having a height of more than 9.5m—the servicing equipment complies with subsection (3), and (iii) if the development results in a building with more than 2 storeys—the additional storeys are set back within planes that project at an angle of 45 degrees inwards from all side and rear boundaries of the site.		
(3) The servicing equipment must— (a) be fully integrated into the design of the roof or contained and suitably screened from view from public places, and (b) be limited to an area of no more than 20% of the surface area of the roof, and (c) not result in the building having a height of more than 11.5m.	Section 5.6.1	EIS Appendix A Appendix BB
(4) Subsection (2)(a) and (b) do not apply to development the subject of a development application made by the following— (a) the Aboriginal Housing Office or the Land and Housing Corporation, (b) another social housing provider.	Section 5.6.1	EIS
Section 88 – Restriction on occupation of seniors housing		
(1) Development permitted under this Part may be carried out for the accommodation of only the following— (a) seniors or people who have a disability, (b) people who live in the same household with seniors or people who have a disability, (c) staff employed to assist in the administration and provision of services to housing provided under this Part. (2) Development consent must not be granted under this Part unless the consent authority is satisfied that only the kinds of people referred to in subsection (1) will occupy accommodation to which the development relates.	Section 5.6.1	EIS
Section 91 – Fire sprinkler systems in residential care facilities		
(1) A consent authority must not grant consent for development for the purposes of a residential care facility unless the facility will include a fire sprinkler system. (2) Development for the purposes of the installation of a fire sprinkler system in a residential care facility may be carried out with development consent.	Section 5.6.1	-
Section 94 – Location and access to facilities and services – residential care facilities		
(1) Development consent must not be granted for development for the purposes of a residential care facility unless the consent authority is satisfied that residents of the facility will have access to facilities and services— (a) on-site, or (b) by a transport service other than a passenger service.	Section 5.6.1	Appendix P
Section 95 – Water and Sewerage		
(1) A consent authority must not consent to development under this Part unless the consent authority is satisfied the seniors housing will— (a) be connected to a reticulated water system, and (b) have adequate facilities for the removal or disposal of sewage. (2) If the water and sewerage services will be provided by a person other than the consent authority, the consent authority— (a) must consider the suitability of the site in relation to the availability of reticulated water and sewerage infrastructure, or	Section 5.6.1	Appendix O

Statutory Requirements	Report / EIS	Technical Study
(b) if reticulated services are not available—must satisfy the relevant authority that the provision of water and sewerage infrastructure, including environmental and operational considerations, is satisfactory for the development.		
Section 98 – Design of seniors housing		
A consent authority must not consent to development for the purposes of seniors housing unless the consent authority is satisfied that the design of the seniors housing demonstrates adequate consideration has been given to the principles set out in Division 6.	Section 5.6.1	Appendix A Appendix B
Section 99 – Neighbourhood amenity and streetscape		
Seniors housing should be designed to— (a) recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation, and (b) recognise the desirable elements of— (i) the location's current character, or (ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area, and (c) complement heritage conservation areas and heritage items in the area, and (d) maintain reasonable neighbourhood amenity and appropriate residential character by— (i) providing building setbacks to reduce bulk and overshadowing, and (ii) using building form and siting that relates to the site's land form, and (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours, and (e) set back the front building on the site generally in line with the existing building line, and (f) include plants reasonably similar to other plants in the street, and (g) retain, wherever reasonable, significant trees, and (h) prevent the construction of a building in a riparian zone.	Section 5.6.1	Appendix A Appendix B Appendix E
Section 100 – Visual and acoustic privacy		
Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and residents by— (a) using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and (b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.	Section 5.6.1	Appendix B Appendix S
Section 101 – Solar access and design for climate		
The design of seniors housing should— (a) or development involving the erection of a new building—provide residents of the building with adequate daylight in a way that does not adversely impact the amount of daylight in neighbouring buildings, and (b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation, solar heating and lighting by locating the windows of living and dining areas in a northerly direction.	Section 5.6.1	Appendix A Appendix B
Section 102 – Stormwater		
The design of seniors housing should aim to— (a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and	Section 5.6.1	Appendix T

Statutory Requirements	Report / EIS	Technical Study
(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.		
Section 103 – Crime prevention		
Seniors housing should— (a) be designed in accordance with environmental design principles relating to crime prevention, and (b) provide personal property security for residents and visitors, and (c) encourage crime prevention by— (i) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and (ii) providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and (iii) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.	Section 5.6.1	Appendix Z
Section 104 – Accessibility		
Seniors housing should— (a) have obvious and safe pedestrian links from the site that provide access to transport services or local facilities, and (b) provide attractive, yet safe, environments for pedestrians and motorists with convenient access and parking for residents and visitors.	Section 5.6.1	Appendix N
Section 105 – Waste management		
Seniors housing should include waste facilities that maximise recycling by the provision of appropriate facilities.	Section 5.6.1	Appendix V
Section 106 – Interrelationship of Division with design principles in Division 6		
Nothing in this Division permits the granting of consent to development under this Part if the consent authority is satisfied that the design of the seniors housing does not demonstrate that adequate consideration has been given to the principles set out in Division 6.	Section 5.6.1	Appendix B
Section 107 – Non-discretionary development standards for hostels and residential care facilities—the Act, s 4.15		
(1) The object of this section is to identify development standards for particular matters relating to development for the purposes of hostels and residential care facilities that, if complied with, prevent the consent authority from requiring more onerous standards for the matters. (2) The following are non-discretionary development standards in relation to development for the purposes of hostels or residential care facilities— (a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building, (b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m— (i) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and (ii) is limited to an area of no more than 20% of the surface area of the roof, and (iii) does not result in the building having a height of more than 11.5m, (c) the density and scale of the buildings when expressed as a floor space ratio is 1:1 or less, (d) internal and external communal open spaces with a total area of at least— (i) for a hostel—8m2 for every bed, or (ii) for a residential care facility—10m2 for every bed, (e) at least 15m2 of landscaped area for every bed, (f) a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 6m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site, (g) for a hostel—at least 1 parking space for every 10 beds in the hostel,	Section 5.6.1	Appendix B Appendix E Appendix P

Statutory Requirements	Report / EIS	Technical Study
(h) for a residential care facility—at least 1 parking space for every 15 beds in the facility, (i) at least 1 parking space for every 2 employees who are on duty at the same time, (j) at least 1 parking space for the purpose of ambulance parking.		
State Environmental Planning Policy (Planning Systems) 2021		
Schedule 1 State significant development – general		
Section 28 Seniors housing Development for the purposes of seniors housing if— (a) the seniors housing component has a capital investment value of— (i) for development on land in the Greater Sydney region—more than $30 million, or (ii) otherwise—more than $20 million, and (b) the seniors housing component includes a residential care facility, and (c) other components of the proposed development are not prohibited on the land under an environmental planning instrument.	Section 5.3	CIV Report – under separate cover
State Environmental Planning Policy (Transport and Infrastructure) 2021		
Section 2.48 - Determination of development applications—other development		
(1) This section applies to a development application (or an application for modification of a consent) for development comprising or involving any of the following— (a) the penetration of ground within 2m of an underground electricity power line or an electricity distribution pole or within 10m of any part of an electricity tower, (b) development carried out— (i) within or immediately adjacent to an easement for electricity purposes (whether or not the electricity infrastructure exists), or (ii) immediately adjacent to an electricity substation, or (iii) within 5m of an exposed overhead electricity power line, (c) installation of a swimming pool any part of which is— (i) within 30m of a structure supporting an overhead electricity transmission line, measured horizontally from the top of the pool to the bottom of the structure at ground level, or (ii) within 5m of an overhead electricity power line, measured vertically upwards from the top of the pool, (d) development involving or requiring the placement of power lines underground, unless an agreement with respect to the placement underground of power lines is in force between the electricity supply authority and the council for the land concerned. (2) Before determining a development application (or an application for modification of a consent) for development to which this section applies, the consent authority must— (a) give written notice to the electricity supply authority for the area in which the development is to be carried out, inviting comments about potential safety risks, and (b) take into consideration any response to the notice that is received within 21 days after the notice is given.	Section 5.5	EIS
State Environmental Planning Policy (Industry and Employment) 2021		
Section 3.6 – Granting of consent to signage		
A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied— (a) that the signage is consistent with the objectives of this Chapter as set out in section 3.1(1)(a), and (b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 5.	Section 5.6.2	Appendix A
State Environmental Planning Policy (Resilience and Hazards) 2021		
Section 4.5 – Contamination and remediation to be considered in determining development applications		

Statutory Requirements	Report / EIS	Technical Study
(1) A consent authority must not consent to the carrying out of any development on land 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.	Section 5.5	Appendix U
Canterbury Local Environmental Plan 2012		
Section 2.3 – Zone objectives and land use table		
(2) The consent authority must have regard to the objectives for development in a zone when determining a development application in respect of land within the zone.	Section 5.6	EIS
Section 4.3 – Height of buildings		
(2) The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.	Section 5.6 Section 6.1	Appendix A Appendix BB
Section 4.4- Floor Space Ratio		
(2) The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.	Section 5.6 Section 6.1	Appendix A
Section 4.6 – Exceptions to development standards		
(2) Development consent may, subject to this clause, be granted for development even though the development would contravene a development standard imposed by this or any other environmental planning instrument. However, this clause does not apply to a development standard that is expressly excluded from the operation of this clause.	Section 5.6 Section 6.1	Appendix A Appendix BB
Section 5.21 – Flood planning		
(2) Development consent must not be granted to development on land the consent authority considers to be within the flood planning area unless the consent authority is satisfied the development— (a) is compatible with the flood function and behaviour on the land, and (b) will not adversely affect flood behaviour in a way that results in detrimental increases in the potential flood affectation of other development or properties, and (c) will not adversely affect the safe occupation and efficient evacuation of people or exceed the capacity of existing evacuation routes for the surrounding area in the event of a flood, and (d) incorporates appropriate measures to manage risk to life in the event of a flood, and (e) will not adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.	Section 5.6	Appendix CC
Section 6.1 – Acid sulfate soils		
(3) Development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan has been prepared for the proposed works in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.	Section 5.6	Appendix R
Section 6.2 Earthworks		
(3) Before granting development consent for earthworks (or for development involving ancillary earthworks), the consent authority must consider the following matters— (a) the likely disruption of, or any detrimental effect on, drainage patterns and soil stability in the locality of the development, (b) the effect of the development on the likely future use or redevelopment of the land, (c) the quality of the fill or the soil to be excavated, or both,	Section 5.6	Appendix R

Statutory Requirements	Report / EIS	Technical Study
(d) the effect of the development on the existing and likely amenity of adjoining properties, (e) the source of any fill material and the destination of any excavated material, (f) the likelihood of disturbing relics, (g) the proximity to, and potential for adverse impacts on, any waterway, drinking water catchment or environmentally sensitive area, (h) any appropriate measures proposed to avoid, minimise or mitigate the impacts of the development.		
Section 6.4 Stormwater management		
(3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development— (a) is designed to maximise the use of water permeable surfaces on the land having regard to the soil characteristics affecting on-site infiltration of water, and (b) includes, if practicable, on-site stormwater retention for use as an alternative supply to mains water, groundwater or river water, and (c) avoids any significant adverse impacts of stormwater runoff on adjoining properties, native bushland and receiving waters, or if that impact cannot be reasonably avoided, minimises and mitigates the impact.	Section 5.6	Appendix T Appendix AA

Attachment 3 – Mitigation Measures

The collective measures required to mitigate the impacts associated with the proposed works are defined in the table below. These measures have been derived from the previous assessment in **Section 6.0** and those detailed in appended consultants' reports.

Ref No.	Mitigation Measure
Design and Operation	
Visual and Built Form	
D/O-BF	Measures have been incorporated to reduce the visual impact of the development when viewed from nearby residential development and the public domain.
Trees Removal	
D/O-TR1	Trees 1-3, 6 and 22-34, 40, 42 will be required to be fenced for protection. All fencing shall be installed as specified in Section 5.2 (Tree Protection – Implementation of Tree Protection Zone). Indicative locations of the fencing will be shown in the Tree Protection Plan
D/O-TR2	All tree protection works should be carried out before the start of demolition or building work. It is recommended that chain mesh fencing with a minimum height of 1.8 metres be erected as shown in the Tree Protection Plan. Specifications for this fencing are shown in Tree Protection Fencing Specifications. TPZ fencing shall comply with the Australian Standard Protection of trees on development sites, AS 4970, 2009.
D/O-TR3	Trees 6, 40 and 42 will require trunk protection. This is achieved by attaching lengths of timber (75mm x 50mm x 2000mm) fastened around the trunk. Geotextile fabric or carpet underlay shall be wrapped around the trunk prior to the timbers being attached. These timbers are to be fastened with hoop iron strapping and not attached directly into the bark of the tree. These timbers are only to be removed when all construction is complete. Trunk protection shall comply with the Australian Standard Protection of trees on development sites, AS 4970, 2009.
D/O-TR4	All tree protection works should be carried out before the start of demolition or building work. It is recommended that chain mesh fencing with a minimum height of 1.8 metres be erected as shown in the Tree Protection Plan Specifications for this fencing are shown in Tree Protection Fencing Specifications
D/O-TR5	Ply sheeting should be placed over the root zone of Tree 1-3 and 6 to reduce compaction over the root zone whilst works are occurring. This ground protection allows the TPZ fenced to be placed closer to a tree to allow construction access. The area for ply sheeting can be seen in the Tree Protection Plan,
D/O-TR6	The following activities shall be avoided within the TPZ and SRZ of any tree to be retained. • Erecting site sheds or portable toilets. • Trenching, ripping or cultivation of soil (with the exception of approved foundations and underground services). • Soil level changes or fill material (pier and beam or suspended slab construction are acceptable). • Storage of building materials. • Disposal of waste materials, solid or liquid.
D/O-TR7	If the retained trees are damaged, a qualified Arborist should be contacted as soon as possible. The Arborist will recommend remedial action so as to reduce any long term adverse effect on the tree's health.
D/O-TR8	It is recommended that signage is attached to the tree protection fencing. This sign may be copied and laminated then attached to any TPZ fencing.
D/O-TR9	It is recommended that the developer/Contractor supply Council or the Principal Certifying Authority with certification from the Project Arborist three (3) times during the construction

Ref No.	Mitigation Measure
	phase of the development in order to verify that retained trees have been correctly retained and protected as per the conditions of consent and Arborist's recommendations.
Waste	
D/O-WA1	The waste management recommendations outlined in the Operational WMP are to be followed during the operation of the proposal.
Sustainability	
D/O-ESD	The detailed design of the development is to achieve compliance with the ESD Report prepared by JHA.
Construction Management	
Noise and Vibrations	
CM-NV1	General management measures: Introduce best-practice general mitigation measures in the workplace which are aimed at reducing the acoustic impact onto the nearest affected receivers.
CM-NV2	Project notification: Issue project updates to stakeholders, discussing overviews of current and upcoming works. Advanced warning of potential disruptions can be included. Content and length to be determined on a project-by-project basis.
CM-NV3	Verification monitoring: Monitoring to comprise attended or unattended acoustic surveys. The purpose of the monitoring is to confirm measured levels are consistent with the predictions in the acoustic assessment, and to verify that the mitigation procedures are appropriate for the affected receivers. If the measured levels are higher than those predicted, then the measures will need to be reviewed and the management plan will need to be amended.
CM-NV4	Compliance management system: Implement a management system which includes procedures for receiving and addressing complaints from affected stakeholders
CM-NV5	Specific notification: Individual letters or phone calls to notify stakeholders that noise levels are likely to exceed noise objectives. Alternatively, contractor could visit stakeholders individually in order to brief them in regards to the noise impact and the mitigation measures that will be implemented.
CM-NV6	Respite offer: Offer provided to stakeholders subjected to an ongoing impact.
CM-NV7	Alternative construction methodology: Contractor to consider alternative construction options that achieve compliance with relevant criteria. Alternative option to be determined on a case-by-case basis. It is recommended that the selection of the alternative option should also be determined by considering the assessment of on-site measurements (refer to Verification Monitoring above).
CM-NV8	Any vibration generating plant and equipment is to be in areas within the site in order to lower the vibration impacts.
CM-NV9	Investigate the feasibility of rescheduling the hours of operation of major vibration generating plant and equipment.
CM-NV10	Use lower vibration generating items of construction plant and equipment; that is, smaller capacity plant.
CM-NV11	Minimise conducting vibration generating works consecutively in the same area (if applicable).
CM-NV12	Schedule a minimum respite period of at least 30 minutes before activities commence which are to be undertaken for a continuous 4-hour period.

Ref No.	Mitigation Measure
CM-NV13	Use only dampened rock breakers and/or “city” rock breakers to minimise the impacts associated with rock breaking works.
CM-NV14	Conduct attended measurements of vibration generating plant at commencement of works in order to validate the indicative safe working distances advised above and, consequently, to establish safe working distances suitable to the project. Measurements should be conducted at the nearest affected property boundary. These safe working distances should be defined by considering the vibration criteria discussed in Section 4.3 (i.e., criteria for structural damage, human comfort and impact to scientific or medical equipment).
Construction Waste	
CM-CW1	Records of waste volumes recycled, reused or contractor removed are to be maintained. Additionally, dockets/receipts verifying recycling/disposal in accordance with the WMP must be kept and presented to Council or the EPA if and when required.
CM-CW2	Daily visual inspections of waste storage areas will be undertaken by site personnel and inspection checklists/logs recorded for reporting to the Site Manager on a weekly basis or as required. These inspections will be used to identify and rectify any resource and waste management issues.
CM-CW3	Waste audits are to be carried out by the Building Contractor to gauge the effectiveness and efficiency of waste segregation procedures and recycling/reuse initiatives. Where audits show that the above procedures are not carried out effectively, additional staff training should be undertaken and signage re-examined.
CM-CW4	All environmental incidents are to be dealt with promptly to minimise potential impacts. An incident register must be maintained on-site at all times and should include the contact details of the 24-hour EPA Pollution line. Likely incidents to occur during the construction and demolition stage of the development may involve fuel or chemical spills, seepage or mishandling of hazardous waste, or unlicensed discharge of pollutants to environment.
Hazards Management	
CM-HA	In the event hazardous materials are identified, the recommendations of the Hazardous Materials Survey are to be followed.
Contamination	
D/O-CO1	Detailed sampling and/or testing in the vicinity of BH120 to delineate the extent of asbestos contamination.
D/O-CO2	Sampling and testing of soils beneath the houses, building, and concrete covered areas after demolition and removal of site features.
D/O-CO3	Development of a remedial action plan (RAP) to remediate asbestos contaminated fill, plus any other contamination identified through the recommended additional sampling and testing, followed by appropriate validation
Remediation	
D/O-RE1	Sampling and testing of soils beneath the houses, building, and concrete covered areas after demolition and removal of site features.
D/O-RE2	Revise the RAP, if required, to remediate any other contamination that might be identified through the recommended additional sampling and testing, followed by appropriate validation. If no other contamination is detected beneath the site features after removal, carry out appropriate remediation and validation of only Area 1.
D/O-RE3	A validation report will be produced at completion of successful remediation by the appointed environmental consultant. The format of the report will follow that recommended in the NSW Environment Protection Authority (EPA), “Consultants Reporting on Contaminated Land" – 2020.