

## Appendix FF – Detailed Consistency with Ku-ring-gai Development Control Plan 2015

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 *State Environmental Planning Policy (Planning Systems) 2021*, which states that ‘Development Control Plans...do not apply to... State significant development.’

It is noted that the KDCP 2015 does not provide any provisions for seniors housing in the form of residential care facilities and rather only includes controls that relate to residential development such as dwelling houses, secondary dwellings, multi dwelling housing, residential flat buildings and mixed-use development. In lieu of the objectives and controls for the proposed use, the key aspects and where alternate solutions are proposed are discussed in the table below.

The R2 zone is a prescribed zone in accordance with the *State Environmental Planning Policy (Housing 2021)* (Housing SEPP) and seniors housing in the form of a residential care facility is permissible in the zone. The built form of such development is guided by the development standards of the Housing SEPP and importantly the proposed development complies with the maximum building height and floor space ratio development standards as detailed in the Environmental Impact Statement and the Architectural Plans prepared by Group GSA.

Provision	Comment	Reference in EIS
<b>Part 6 – Multi Dwelling Houses</b>		
<b>6A.1 Local Character and Streetscape</b>	<p>The proposed development has been designed by Group GSA who are registered architects and provided at <b>Appendix B</b>.</p> <p>The architectural design of the proposed development is generally based on the existing predominant and high quality characteristics of the local neighbourhood, to ensure it appropriately integrates with adjoining properties. Specifically, the proposed development has respected the sensitive interfaces of the neighbouring sites through the introduction of a fine grain residential character to the proposal and substantial deep soil zone and landscaping embellishments along the site boundaries. This visually breaks down the mass of the development into smaller clusters. This reduction of building length also creates a more human scale and is representative of the bulk and mass of surrounding buildings. Refer to <b>Appendix B</b> for greater detail.</p> <p>The substantial landscaped setbacks on all frontages, especially Flinders Avenue and Mona Vale Road, have been provided as a buffer to the adjacent residential dwellings, reducing visual impact and mitigating noise. This creates a visual barrier when viewed from Mona Vale Road and Flinders Avenue and provides landscaped amenity for residents and the community.</p>	Section 3.1

<b>6A.2 Site Layout</b>	<p>The massing arrangement has directly responded to the existing site conditions, inclusive of topography, tree retention, boundary interfaces and place mapping. The built form fits into the terrain and maximises communal open space for use by residents year round. Refer to the Architectural Plans at <b>Appendix B</b> for greater detail.</p>	Section 3.4
<b>6A.3 Building Setback</b>	<p>The proposed setbacks have been developed in accordance with the DCP requirements and are as follows:</p> <ul style="list-style-type: none"> <li>• 6m-24.5m from the western boundary (Mona Vale Road);</li> <li>• 3m-3.2m from the northern boundary;</li> <li>• 3m-11.2m from the eastern boundary;</li> <li>• 6m-13.7m from the south eastern boundary fronting Flinders Avenue;</li> <li>• 3m-7.2m from the southern boundary; and</li> <li>• 3m-9.8m from the south western boundary.</li> </ul> <p>While there is a minor exceedance to the 10m setback at the Mona Vale Road setback, this is limited to the north-western corner, with the remainder of this frontage being entirely compliant with the 10m setback. This setback accommodates two driveways to provide ingress and egress to the port-cochere and ground floor car park. While the Mona Vale Road setback will result in a non-compliance in the north-western corner, this setback includes substantial landscaping to ensure it is consistent with the streetscape character and nature of adjoining development.</p> <p>As specified in section 1, Schedule 8 of the Housing SEPP, residential care facilities typically require a different building shape from other residential accommodation due to the operational and functional characteristics of these developments. The setbacks adopted on the site have been formulated in response to the site's context. It is noted that setbacks along Mona Vale Road and Flinders Avenue vary however, the proposal has sought to respond to the existing residential character by incorporating substantial landscaping embellishments and the retention of mature trees along perimeter boundaries where possible.</p>	Section 6.1.4
<b>6A.4 Building Separation</b>	<p>The proposed development has been designed to suit the operational and functional needs of RCFs. Importantly, while appropriate separation distances between households have been carefully considered and incorporated into the design, RCFs are more akin to hospital developments and not multi dwelling housing or residential flat buildings. Therefore, while the proposed development may not comply with the building separation distances, the analysis prepared by Group GSA at <b>Appendix B</b> illustrates that RCF beds and communal areas are able to achieve adequate amenity both internally and externally.</p> <p>Further, it is important to note that RCF developments are designed to provide ease and efficiency in emergency care and attention to staff, while also promoting social interaction and cohesion amongst residents. Accordingly, the floor plan and site layout is specific to the operational characteristics of this form of development and is considered appropriate in the context of the land use and Opal's functionality requirements.</p>	Section 6.1
<b>6A.5 Site Coverage</b>	<p>The proposed site coverage is 4,526m<sup>2</sup>, which equates to 48.5% of the total site area. Despite this minor non-compliance with the maximum 40% site coverage provision under the KDCP 2015, the proposed development seeks to retain 12 trees and ensure a tree</p>	Section 4.0

canopy cover of 2,028m<sup>2</sup> (22% of the site) through the planting of additional trees. In addition, it is emphasised that the proposed development comprises a deep soil of 1,531m<sup>1</sup> (16.4% of the site) and a communal open space of 2,365m<sup>2</sup> which is entirely compliant with the non-discretionary standards of the *State Environmental Planning Policy (Housing) 2021*.

<b>6A.6 Deep Soil Landscaping</b>	As aforementioned, the proposal will provide 1,531m <sup>2</sup> of deep soil, equating to 16.4% of the total site area. Despite non-compliance with the control of 40% deep soil within the DCP, the 16.4% is considered appropriate for the site as it complies and exceeds the Housing SEPP requirements of minimum 15% deep soil.	Section 6.3
<b>6B.1 Vehicle Access</b>	Access to the site will be provided exclusively from Mona Vale Road through two driveways, which will provide access to the ground floor car park. This exceeds the DCPs maximum of one driveway, however, the two driveways for this RCF are required to provide safe ingress and egress off Mona Vale Road and provide appropriate capacity for staff, visitors, residents and service vehicles.	Section 6.8
<b>6B.2 Car Parking Provision</b>	The proposed development will provide a total of 42 car parking spaces, inclusive of two accessible parking spaces within a basement, allocated for residents, staff and visitors (refer to <b>Appendix R</b> ). Despite these figures not complying with the KDCCP 2023, the proposal is compliant with the car parking provisions provided within the Housing SEPP.	Section 6.8
<b>6B.3 Bicycle Parking Provision</b>	Further, the proposal also provides direct access to the carpark which includes double lane ramps and is therefore compliant with the relevant provisions. For further information, refer to <b>Appendix R</b> and <b>Section 6.8</b> within the EIS.	Section 6.8
<b>6B.3 Bicycle Parking Provision</b>	There is no requirement within the DCP or Housing SEPP for the provision of bicycle parking within an RCF. Nevertheless, the provision of bicycle spaces for staff is proposed to reduce traffic generation and promote active modes of transport. As a result, the proposed development will accommodate four (4) bicycle spaces in addition to end of trip facilities, inclusive of change and shower rooms, and lockers.	Section 6.8
<b>6C.1 Communal Open Space</b>	2,365m <sup>2</sup> of communal open space is proposed, significantly exceeding the requirement of 144m <sup>2</sup> of communal open space. This communal open space is accessible through the provision of ramps and is capable of surveillance from at least two dwellings. For greater information pertaining to the proposed communal open space, refer to <b>Appendix B</b> .	Section 3.8
<b>6C.2 Private Open Space</b>	In accordance with the Housing SEPP, adequate private open space has been provided in the form of a private balcony to every bed, ensuring amenity for residents. Further to this is the provision of 15m <sup>2</sup> of communal open space and landscaped area per resident, enabling residents to enjoy outdoor living which is integrated into the overall design of the development and complies with the Housing SEPP. As such, the nature of private open space allows for the provision of views and passive surveillance to ensure safety of residents within the development site.	Section 3.8
<b>6C.3 Solar Access and Daylight</b>	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 beds receiving sunlight to habitable rooms, with units seeking to orient to the north where possible, which will allow most units to achieve an acceptable degree of solar access throughout the day. Internally within the site, communal areas have been oriented to ensure appropriate solar access as well.	Section 6.4.2
<b>6C.6 Dwelling Placement and Room Design</b>	The proposal is for an RCF and in turn, these controls are not applicable to the proposal. The architectural design will deliver a high-quality building, which will support a safe and secure aged living environment. Specifically, the development has been designed to be developed in a manner that minimises impacts on its surrounds and	N/A Section 3.5

<b>6C.7 Building Entries and Internal Pathways</b>	<p>improve the natural, historical, and environmental qualities of the site. The proposed building facades will be modulated and articulated with wall planes and architectural elements that vary in depth, reducing the bulk and scale of the development. All services are located in accordance with the Housing SEPP.</p>	
<b>6C.8 Building Facades and articulation</b>		
<b>6C.9 Building Storeys</b>	<p>The proposed development includes a 145-bed within a single part 2-3 storey building and a ground floor car park, complying with the necessary building controls within the KDCP. Importantly, the proposed building height reflects the sloping topography of the site and is entirely compliant with the maximum building height pursuant to the Housing SEPP. For greater detail, refer to <b>Appendix B</b>.</p>	<p>Section 6.1</p>
<b>6C.10 Top Storey Design and Roof Forms</b>	<p>The second and third storey has been incorporated into the flat roof structure. Specifically, the roof will enable the collection of solar energy through the provision of a roof-mounted photovoltaic system. The roof will incorporate mechanical plant, facilitated by the Housing SEPP which allows for mechanical plants to exceed the 9.5m height plane up to 11.5m, in which the development complies with.</p>	<p>Section 6.1</p>
<b>6C.12 Visual and Acoustic Privacy</b>	<p>The orientation and design of the building elevations including windows and balconies has been carefully considered in the design of the proposed development, maximising the visual and acoustic privacy of each room within the 'care households'. This can be seen through the placement of non-residential built form along the site's western frontage, respecting the interface with Mona Vale Road and proposing a landscaping buffer with a secondary setback that will minimise noise intrusions.</p> <p>Further to this, the proposal retains 12 trees and avenues of hedge and tree planting to offer visual and acoustic privacy towards the residential areas, particularly to the eastern boundary.</p> <p>The proposal has defined the setback and increased the vegetation interface through the retainment of the green curtain of hedges and climbing plants along each boundary interface. This approach was considered and implemented as a result of community feedback desiring an increase in privacy. For further information, refer to <b>Appendix F</b>.</p> <p>Further, a Noise and Vibration Impact Assessment is provided in <b>Appendix X</b> which confirms that the proposal is capable of providing reasonable acoustic impacts and will retain appropriate acoustic amenity surrounding residential development during the operation of the RCF.</p>	<p>Section 6.3, Section 6.4, Section 6.5, Section 6.12</p>
<b>6C.15 Fencing</b>	<p>The proposed development includes the use of fences and locked doors as part of the resident safety strategy. In addition, the proposal utilises landscaping along street frontages and its boundaries to ensure the fencing design responds to the leafy character of the streetscape. For greater detail, refer to <b>Appendix B</b>.</p>	<p>Section 6.13</p>

Part 12 – Signage		
<b>12.1 Signage General</b>	The proposed development includes seven signage zones. This signage will be integrated within the architecture of the proposed building, providing necessary building identification for residents, staff and visitors.	Section 4.6
<b>12.2 Identification Signs – Building</b>	<p>The proposal does not strictly comply with the requirements of this control as it is proposed to include seven (1) signage zones for building identification, exceeding the permissible of one (1) sign permitted within residential zones.</p> <p>However, as detailed in the Architectural Plans at <b>Appendix B</b> and <b>Section 3.6</b> of the EIS, signage zones will be integrated within the architecture of the proposed building, providing necessary building identification and wayfinding for residents, staff and visitors. Various signage zones will be located at the interface to Mona Vale Road while others will be internal to the site, near the reception area and adjacent to ingress and egress points and therefore will not be visible from the public domain. Notwithstanding this, compliance of the proposed signage has been assessed against Schedule 5 of the <i>State Environmental Planning Policy (Industry and Employment) 2021</i> and is found to comply (refer to <b>Section 4.3</b>).</p>	Section 4.0
<b>12.7 Illumination of Signs</b>	The proposed development is neither non-residential or mixed-use and therefore, does not require compliance with this control. Despite not requiring compliance with this control, the proposed development demonstrates compliance as the illumination is proposed to a limited number of signs and will be concealed through a LED strip lighting to the surrounds of the sign. Further information pertaining to the details of the signage will be finalised at detailed design stage.	N/A
<b>12.10 Maintenance</b>	Capable of compliance.	N/A
Part 23 – General Building Design and Sustainability		
<b>23.1 Social Impact</b>	A Social Impact Assessment provided at <b>Appendix M</b> concludes that the overall outcome, subject to appropriate mitigation of construction and operational impacts, will be positive.	Section 6.21
<b>23.3 Sustainability of Building Materials</b>	Refer to <b>Section 3.5</b> of the EIS for greater detail pertaining to the materiality of the proposed development.	Section 3.5
<b>23.4 Materials and Finishes</b>	The architectural material palette features a blend of earthy colours and is of a primarily masonry construction, reflecting the existing suburban character of the site's immediate locality, with various roof gardens and landscaping elements blending into its context. For greater detail, refer to <b>Appendix B</b> .	Section 3.5, Section 6.1.6
<b>23.5 Roof Terraces and Podiums</b>	The proposed development comprises terraces on each level, which are used for the residents of each level to improve the function, operation and amenity of the aged care facility.	N/A
<b>23.6 Building Services</b>	Refer to <b>Section 6.17</b> of the EIS for discussion surrounding the proposed building services and how they will be integrated into the development.	Section 6.17

<b>23.7 Waste Management</b>	An operational waste management plan (OsitWMP) has been prepared in <b>Appendix BB</b> with reference to the waste storage requirements of this control. The OWMP concludes that the proposal is capable of suitably managing waste, with RCF staff supporting the waste management of the facility.	Section 6.20
<b>23.8 General Acoustic Privacy</b>	A Noise and Vibration Impact Assessment is provided in <b>Appendix X</b> which confirms that the proposal is capable of providing reasonable retaining reasonable acoustic amenity to surrounding residential development during the operation of the RCF.	Section 6.12
<b>23.9 General Visual Privacy</b>	<p>The design of the RCF has been formulated in response to the site's context and desire to optimise amenity both within the development and to adjoining properties. Refer to the Architectural Plans (<b>Appendix B</b>) and the Design Report (<b>Appendix F</b>).</p> <p>Further, the proposal retains existing trees where possible and avenues of hedge planting to offer visual and acoustic privacy towards the denser residential areas. Specifically, the proposal has defined the setback and increased the vegetation interface through the retainment of the green curtain of hedges and climbing plants along each boundary interface. This approach was considered and implemented as a result of community feedback desiring an increase in privacy.</p> <p>This integrated planting along the perimeter of the boundary has been designed to reflect the existing landscape character of the site which is dominated by native trees and shrubs along residential interfaces. In turn, the proposed development ensures the retainment of landscape character and visual privacy, acting as a privacy mitigation measure into and out of the site. Accordingly, this design measure will improve the visual privacy and amenity between the proposed development and adjoining dwellings.</p>	Section 6.5.3
<b>23.10 Construction, Demolition and Disposal</b>	A Waste Management plan is provided at <b>Appendix BB</b> .	Section 6.20
<b>Part 24 – Water Management</b>		
<b>24A Site Design for Water Management</b>	The development falls under a type 5 development for water management purposes.	N/A
<b>24C On-site Stormwater Management</b>	A Water Management Plan has been prepared by Henry & Hymas and is included at <b>Appendix Y</b> in accordance with the necessary Council codes and policies. For greater detail, refer to <b>Section 3.9</b> and <b>Section 6.16</b> of the EIS.	Section 3.9, Section 6.16
<b>24F On-site Wastewater Management</b>	The existing site has frontage to Sydney Water mains as identified in the Infrastructure Delivery, Management and Staging Plan has been prepared by JHA at <b>Appendix Q</b> . For further discussion, refer to <b>Section 3.3</b> and <b>Section 6.17</b> in the EIS.	Section 3.3, Section 6.17