



# Environmental Impact Statement

**State Significant Development Application  
SSD 69850712**

Mixed use development including seniors housing and a residential  
care facility

1-3 Skyline Place, Frenchs Forest

Prepared for Platino Properties

Submitted to the Department of Planning, Housing and Infrastructure

May 2025

## Overview and declaration

Project details	
Project name	Seniors Housing and Mixed-Use Development
SSD number	69850712
Address	1-3 Skyline Place, Frenchs Forest
Applicant details	
Applicant name	Platino Properties
Applicant address	20 Young Street Neutral Bay NSW 2089
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Declaration by Registered Planner	
<p>I declare that this EIS:</p> <ul style="list-style-type: none"><li>• has been prepared in accordance with sections 190 and 192 of the Environmental Planning and Assessment Regulation 2021</li><li>• contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates</li><li>• does not contain information that is false or misleading</li><li>• addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project</li><li>• identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments</li><li>• has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement</li><li>• 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</li><li>• contains a consolidated description of the project in a single chapter of the EIS</li><li>• contains an accurate summary of the findings of any community engagement</li><li>• contains an accurate summary of the detailed technical assessment of the impacts of the project as a whole.</li></ul>	
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# Summary

This Environmental Impact Statement (EIS) has been prepared by Keylan Consulting Pty Ltd on behalf of Platino Properties (the applicant) to support a State significant development (SSD) application for a concept and Stage 1 development comprising a seniors housing and mixed use development on land at 1 and 3 Skyline Place, Frenchs Forest, in the Northern Beaches local government area (LGA). In accordance with section 4.22(3) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the development application is lodged as a concept development application.

The proposal is classified as State Significant Development (SSD) under Chapter 2 of the *State Environmental Planning Policy (Planning Systems) 2021*. Under Schedule 1, clause 28 of the Planning Systems SEPP, development for the purposes of seniors housing including a residential care facility (RCF), with a capital investment value of more than \$30 million in the Greater Sydney region is State significant.

This EIS has been prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs), issued by the Department of Planning, Housing and Infrastructure (DPHI) on 15 May 2024 and the *State Significant Development Guidelines – Preparing an Environmental Impact Statement*, as required by Part 8 of the *Environmental Planning and Assessment Regulation 2021*.

## Site and context

The site is located at 1 and 3 Skyline Place, Frenchs Forest, within the Northern Beaches LGA. The entire site is zoned SP4 under the *Warringah Local Environmental Plan 2011*. The locality spanning from Wakehurst Parkway to Allambie Road, and also zoned SP4, is known as the Frenchs Forest Business Park.

No. 1 Skyline Place, which is subject to the concept application only, currently contains an existing two storey commercial office building with ancillary parking areas. No. 3 Skyline Place, which is subject to both the concept and Stage 1 applications, currently contains an existing warehouse building and ancillary hardstand parking areas, previously occupied by Miele for showroom purposes. The demolition of the existing building at No. 3 Skyline Place will form part of the proposed Stage 1 works.

Nos. 5 and 7 Skyline Place, directly to the west of the site, have been approved for redevelopment for the purposes of seniors housing and non-residential uses at lower levels. Works at No. 7 have been completed with the development fully occupied. The approved development at No. 5 is currently under construction with completion expected in 2026.

## Project description

The current proposal is part of a broader Skyline Place precinct, inclusive of Nos. 5 and 7 Skyline Place, aligned with a vision for a health-focused urban renewal of the locality which provides high quality, sustainable and supportive housing and facilities for seniors.

Key features of the concept proposal across Nos. 1 and 3 Skyline Place include:

- six buildings (Buildings A - E) accommodating seniors housing including ILUs, RCF and other complementary employment generating land uses which may



include other permissible uses in the SP4 Enterprise zone, including community facilities, health service facilities, educational establishment, early education and care facilities, neighbourhood shops, recreation facilities (indoor) and office premises

- approximately 54,546 square metres (m<sup>2</sup>) of gross floor area (GFA) across the buildings (including approximately 1,864m<sup>2</sup> of non-residential floor area within No. 1 Skyline Place and 546m<sup>2</sup> of non-residential floor area within No. 3 Skyline Place)
- 5% of all ILU GFA to be affordable seniors housing units
- large private and public landscaped open spaces
- internal access road and pedestrian pathways
- basement car parking

The first stage of works at No. 3 Skyline Place (Stage 1 DA) will include:

- site preparation, including demolition, and earthworks;
- construction of three buildings (Buildings A, B and C) ranging in height from 6 to 14 storeys and comprising seniors housing including 200 ILUs, a RCF in Buildings B and C, associated open space and ground level employment generating floor space in Buildings A and B;
- provision of 5% of ILU floor space for seniors living affordable housing units;
- landscaping; and
- basement car parking.

The key project elements are summarised in the table below.

Project element	Summary of the project	
	Concept DA	Stage 1 DA
Project site area	2.2 hectares	1.14 hectares
Site description	<ul style="list-style-type: none"> <li>• 1 Skyline Place, Frenchs Forest (SP 72120); and</li> <li>• 3 Skyline Place, Frenchs Forest (Lot 13 DP 713209)</li> </ul>	3 Skyline Place, Frenchs Forest (Lot 13 DP 713209)
Gross floor area (GFA)	Approx. 54,546 m <sup>2</sup> , comprising: <ul style="list-style-type: none"> <li>• 1 Skyline Place - 24,040m<sup>2</sup> (mix of seniors housing and non-residential/employment generating uses)</li> <li>• 3 Skyline Place - 30,506m<sup>2</sup></li> </ul>	Total 30,506 m <sup>2</sup> , including: <ul style="list-style-type: none"> <li>• 28,139 m<sup>2</sup> of ILUs</li> <li>• 787m<sup>2</sup> of indoor communal areas</li> <li>• 1,034m<sup>2</sup> of residential aged care facility</li> <li>• 546m<sup>2</sup> of employment generating uses</li> </ul>
Residential apartment mix	Approx. 349 ILUs, comprising: <ul style="list-style-type: none"> <li>• 1 Skyline Place - 149 units</li> <li>• 3 Skyline Place - 200 ILUs</li> </ul>	200 ILUs (including 5% affordable housing units), comprising: <ul style="list-style-type: none"> <li>• 22 x 1 bdrm units</li> </ul>

Project element	Summary of the project	
	Concept DA	Stage 1 DA
		<ul style="list-style-type: none"> <li>47 x 2 bdrm units</li> <li>131 x 3 bdrm units</li> </ul> 20 RCF rooms
Affordable Housing	5% of total ILU GFA to be affordable seniors housing	5% of ILU GFA = 1,407 m <sup>2</sup>
Building height - storeys	1 Skyline Place: Building D - 6 storeys Building E - 8 storeys Building F - 8 storeys  3 Skyline Place - refer next column	Building A - 8 storeys Building B - 8 storeys Building C - part 6/part 14 storeys (noting that the basement under all buildings protrudes more than 1 m above existing ground level at some points)
Building height - metres	1 Skyline Place: Building D - RL 181 Building E - RL 183 - RL 187 Building F - RL 187  3 Skyline Place - refer next column	<ul style="list-style-type: none"> <li>Building A - RL 187.4 or 30.4m</li> <li>Building B - RL 187.4 or 31m</li> <li>Building C - RL 182.7 to RL 205.1 or 26.9m to 47.7m</li> </ul>
FSR	<ul style="list-style-type: none"> <li>1 Skyline Place = 2.15:1</li> <li>3 Skyline Place = refer next column</li> </ul>	2.66:1
Total parking spaces (Stage 1)	Unknown at this stage	326 car parking spaces within basement levels 2 accessible spaces at ground level Provision for bus parking to service the RCF within the basement level
Construction hours	N/A	Monday to Friday: 7am to 5.30pm Saturday: 7am to 3.30pm Sundays and public holidays: N/

Table 1: Project summary

## **community engagement**

Community and stakeholder engagement has been undertaken prior to the lodgement of this EIS, in accordance with DPHI's *Undertaking Engagement Guidelines for State Significant Projects* (November 2021). This includes:

- Platino properties own the majority of the strata scheme at 1 Skyline Place. Engagement with tenants and other owners commenced in 2023 and is ongoing. Support was given to lodge the SSD applications in late 2023 by majority of owners.
- Discussions have been held with DPHI prior to the issuing of the SEARs, including a scoping meeting on 3 April 2024.
- Two community information sessions were held for consultation with surrounding residents.

An outline of all engagement undertaken is included within the Engagement Report at Appendix 31.

## **Assessment and mitigation of impacts**

This EIS provides a comprehensive assessment of the potential impacts associated with the development and issues identified in the SEARs. The EIS is supported by several specialist consultant reports to consider the potential impacts of the proposal.

Impacts considered within the EIS include:

- built form and visual impacts
- traffic and transport
- heritage
- geotechnical
- contamination
- noise and vibration
- biodiversity
- crime prevention
- waste management
- sustainability
- wind
- stormwater and wastewater

This EIS demonstrates that the development complies with the relevant controls and that potential environmental impacts are minimal and can be appropriately managed through the mitigation measures as set out in this EIS.

## **Project justification**

The Applicant has identified the opportunity to upgrade and renew the site in order to create a vibrant, community orientated development through the provision of seniors housing and a mix of other compatible employment generating uses which directly

responds to the demand for much needed seniors housing within the Northern Beaches LGA.

Specifically, this will co-locate seniors housing adjacent to other senior housing developments and a range of major health services facilities including the Northern Beaches Hospital, the future Frenchs Forest town centre and public transport services along Frenchs Forest Road.

The EIS has assessed the proposal in line with the applicable strategic and statutory planning framework and has also considered the likely environmental impacts and required mitigation measures. The EIS concludes that the proposal is justified and will result in significant public benefits as set out below:

- The proposal is permissible with consent on the site and consistent with the principles of the Housing SEPP aimed at facilitating diverse housing types and housing that will meet the needs of more vulnerable members of the community, including low income households and seniors.
- It is consistent with the relevant strategic planning framework as it:
  - responds to the anticipated needs of an ageing community through the provision of seniors housing within a precinct which is walkable, in close proximity to health, retail and other services and well serviced by public transport
  - supports housing diversity within the Northern Beaches LGA
  - enables people to continue to live in their community and support networks
  - enables seniors to age in place
  - contributes to the provision of employment within the locality through a mix of uses
  - is consistent with and supports the evolving character of the Frenchs Forest Health and Education Precinct, as identified in the Greater Sydney Region and North District Plans
- The proposal will facilitate a \$343 million investment into the development of the site (including \$168 million within Stage 1 alone) and will facilitate over 1,700m<sup>2</sup> of employment generating floor space across the entire site.
- The development is predicted to generate 465 direct and 1,253 indirect job-years during construction and 72 jobs during operation. While this is lower than the theoretical employment capacity of the site if the existing office and warehouse space were fully occupied, it enables development that supports State housing strategies by expanding the supply of diverse seniors housing. It also provides opportunities for higher order job types and the potential to enhance the broader economic value of the Frenchs Forest business park by improving amenity and providing small, modern, flexible workspaces – addressing factors identified in The Northern Beaches Employment Study as contributing to the business park's underperformance.
- The proposal is in the public interest given it will facilitate the delivery of sustainable, modern, and integrated seniors housing, including affordable housing, that will address the identified shortfall for this type of housing in the Northern Beaches LGA, new higher order employment opportunities, industry

diversification, and compatibility with the Frenchs Forest Health and Education Precinct.

- The site is suitable for the development as:
  - Seniors housing is permissible on the site in accordance with the provisions of the Housing SEPP.
  - The site is a large site without any significant environmental constraints that interfaces with adjoining residential and mixed use development and is therefore capable of accommodating higher density residential and mixed use development.
  - The recent development at the adjacent properties for seniors living at 5-7 Skyline Place provides an opportunity to facilitate a precinct of seniors housing with associated services to meet the needs of current and future residents.
  - The site is surrounded by recently upgraded road infrastructure at Warringah Road and Frenchs Forest Road which are capable of accommodating the traffic generated by the proposed development (noting, however, the proposal results in a nett reduction in traffic generation from the site compared to current conditions).

# 1 Introduction

This Environmental Impact Statement (EIS) supports a State significant development (SSD) application for the first stage of works of a seniors housing and mixed use development on land at 1-3 Skyline Place, Frenchs Forest, in the Northern Beaches local government area.

The application is a concept DA lodged under sections 4.22 and 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The development comprises of a concept development application (DA) across 1 and 3 Skyline Place comprising:

- six buildings (Buildings A - E) accommodating seniors housing including independent living units (ILUs), residential care facility (RCF) and other complementary employment generating land uses which may include other permissible uses in the SP4 Enterprise zone including community facilities, health service facilities, educational establishment, early education and care facilities, neighbourhood shops, recreation facilities (indoor) and office premises
- 5% of all ILU gross floor area (GFA) to be affordable seniors housing units
- approximately 54,546 square metres (m<sup>2</sup>) of GFA across the buildings (including approximately 1,200m<sup>2</sup> of non-residential floor area within No. 1 Skyline Place and approximately 500m<sup>2</sup> of non-residential floor area within No. 3 Skyline Place)
- large private and public landscaped open spaces
- internal access road and pedestrian pathways
- basement car parking

The first stage of works at No. 3 Skyline Place (Stage 1 DA) will include:

- site preparation, including demolition, and earthworks;
- construction of three buildings (Buildings A, B and C) ranging in height from 6 to 14 storeys and comprising seniors housing including 200 ILUs, a RCF in Buildings B and C, associated open space and ground level employment generating floor space in Buildings A and B
- provision of 5% of ILUs as affordable seniors living housing units;
- landscaping; and
- basement car parking.

The proposal is classified as SSD under Chapter 2 of *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP). Under Schedule 1, clause 28 of the Planning Systems SEPP, development for the purposes of a seniors housing facility including an RCF with a capital investment value of more than \$30 million in the Greater Sydney Region is SSD.

The Estimated Development Cost (EDC) for the project is estimated at approximately \$343 million. An EDC Report is at Appendix 7 which breaks down costs associated with the future development of No. 1 and Stage 1 works proposed at No. 3 Skyline Place. The proposed Stage 1 works have an EDC of \$190,613,913.07.

On 15 May 2024, the Secretary’s Environmental Assessment Requirements (SEARs) were issued, and the project was assigned the application number SSD 69850712.

Consideration of the SEARs is at Appendix 1.

The Applicant’s details are provided in the table below.

Applicant	Details
Name	Platino Properties Pty Ltd
Address	20 Young Street Neutral Bay NSW 2089
ABN	91 003 482 326

Table 2: Applicant details



## 1.1 Site description

The site is located at 1 and 3 Skyline Place, Frenchs Forest, in the Northern Beaches LGA and is legally described as:

- SP72120 (1 Skyline Place)
- Lot 13 DP731209 (3 Skyline Place)

The concept proposal applies to both 1 and 3 Skyline Place whilst Stage 1 works are only proposed within 3 Skyline Place.

The site is located approximately 12 kilometres north of the Sydney central business district, approximately 620 metres east of the future Frenchs Forest town centre and approximately 1.3 kilometres east of Forestway Shopping Centre.

The site location is shown in Figures 1 and 2 below.



Figure 1: Site location and surrounding features (Base source: Nearmap)





Figure 2: Site location (Base Source: Nearmap)

### 1.1.1 Key Features of Site and Surrounds

The site contains existing structures across Nos. 1 and 3 Skyline Place. No. 1 contains an existing two-storey commercial building, including multiple tenancies. No. 3 Skyline Place hosts an existing warehouse building which was previously occupied by Miele and operated as a showroom.

A summary of the surrounding development is provided below with distribution land uses shown in Figure 3:

- **North:** The site is bounded by low density residential and the local road network (Frenchs Forest Road East).
- **East:** Frenchs Forest Business Park comprising a mix of commercial, medical and industrial uses, including Genesis Care Oncology Centre and Parkway Hotel.
- **South:** Warringah Road at the site's boundary, with Frenchs Forest Business Park comprising commercial and industrial uses on the southern side of Warringah Road.
- **West:** site bound by Skyline Place. Immediately west of the site is a 2 storey office/warehouse building at 4 Skyline Place, while further west is bushland and beyond Wakehurst Parkway is the Northern Beaches Hospital and future Frenchs Forest town centre.



Figure 3: Land uses context figure (Source: Smith & Tzannes and Matthew Pullinger Architect)

The site is a rectangular shape with a total area of approximately 2.26 ha, comprising 1.12 ha on 1 Skyline Place and 1.14 ha on 3 Skyline Place.

The site is identified within WLEP 2011 as Area A and Area B on the land slip map with a slope of  $<5^{\circ}$  and flanking slopes  $5^{\circ}$  to  $25^{\circ}$ . It is noted that the  $5^{\circ}$  to  $25^{\circ}$  slope classification is limited to a small portion of the site as shown in Figure 4 below.

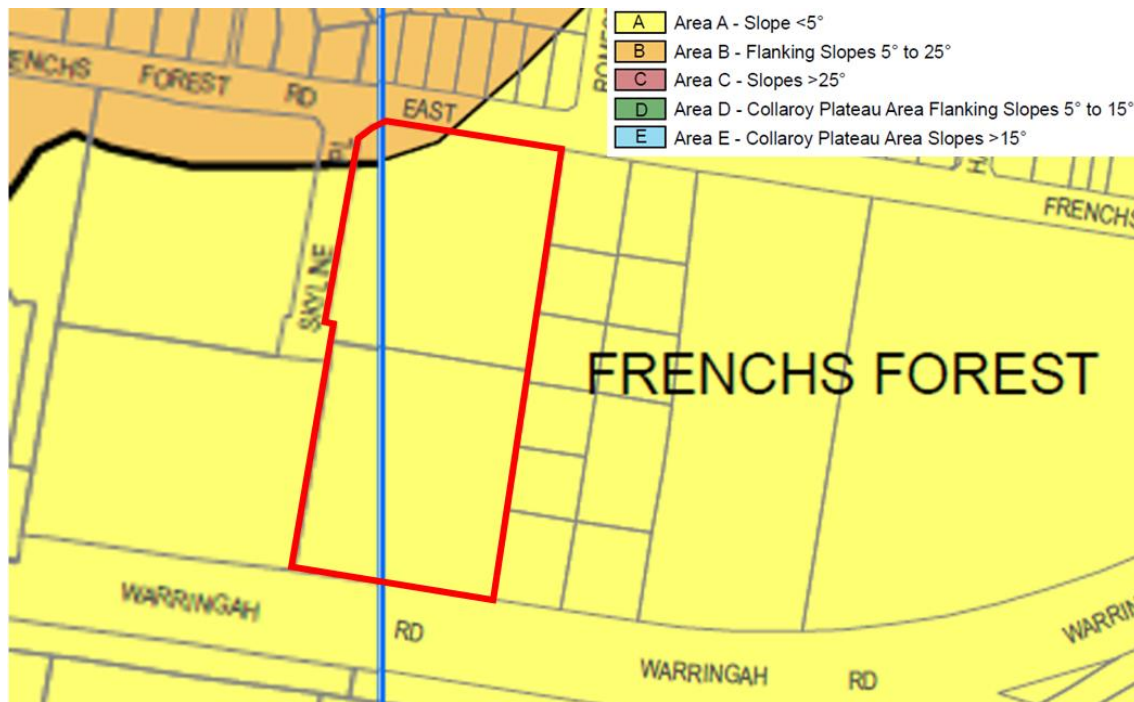


Figure 4: Landslide Risk Map (Source: NSW Planning Portal)

The site contains mature vegetation, with canopies up to 24 m in height, along all its boundaries. No. 1 Skyline Place is also identified as containing 'biodiversity values land', within a small portion along the northern boundary of the site as shown in Figure 5 below. As per the Biodiversity Development Assessment Report (BDAR) at Appendix 17, this land does not contain any areas of environmental significance. There were no threatened species identified at the site when surveyed as part of the BDAR and the land is highly modified with respect to hardstand areas, artificial lighting and noise.

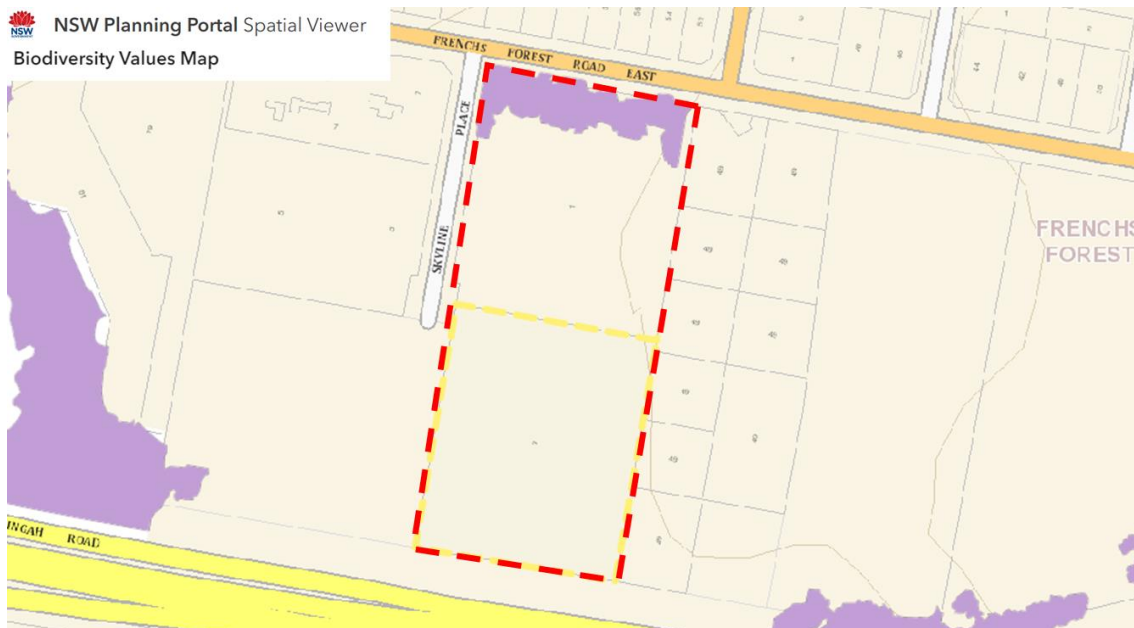


Figure 5: Biodiversity Values Map (Source: NSW Planning Portal)

1 Skyline Place has a gradual fall to the north-west. The highpoint of 3 Skyline Place is in the north-east of the site, with a gradual fall to the south to Warringah Road and the north-east towards 1 Skyline Place and the adjacent site to the east.

## 1.2 Background

### 1.2.1 Relevant history

There are no publicly available DAs applying to 1 Skyline Place on Council's website or DPHI's Major Project Register.

A summary of the publicly available DAs for 3 Skyline Place is provided in the table below.

Development Application	Comment	Status
DA2024/0776	Use of premises as a recreational facility (indoor)	Approved - 30 September 2024
DA2010/0987	Alterations and additions to an existing showroom/office building and the construction of signage.	Approved - 10 August 2010

Table 3: Historic DAs at No. 3 Skyline Place

### 1.2.2 Key strategies and objectives

The proposed development intends to achieve the following objectives:

- Provide much needed accommodation for the ageing population of the Northern Beaches LGA;
- Provide seniors housing within a mixed-use development, and support seniors to allow ageing in place;
- Provision of high-level amenity for residents and visitors through pedestrian connection within the site and the surrounding locality;
- Create a vibrant, mixed use, community-orientated seniors housing development which is complementary to the strategic objectives of the locality relating to the establishment, growth and evolution of Frenchs Forest Health and Education Precinct;
- Co-location with 5-7 Skyline Place with adjacent approved seniors housing developments comprising services to maximise resident amenity; and
- To provide floor area for contemporary employment generating uses which will serve the needs of local residents.
- Locating development surrounded by recently upgraded road infrastructure at Warringah Road and Frenchs Forest Road, capable of accommodating traffic generation from the proposal, despite the proposed development resulting a nett reduction of traffic generated compared to existing conditions.



### 1.3 Related development

The current proposal is located within Skyline Place, whereby recent approvals at Nos. 5 and 7 Skyline Place reflect a vision for a health-focused urban renewal of the locality which provides high quality, sustainable and supportive housing and facilities for seniors. A summary of DAs that relate to Nos. 5 and 7 Skyline Place is provided below.

Subject site DA	DA summary	Decision
DA 2018/0995 5 Skyline Place, now identified as No. 7 Skyline Place	<ul style="list-style-type: none"> <li>16 June 2018: Applicant lodged DA2018/0995 seeking consent for an 8-9 storey mixed use seniors housing development comprising 78 residential apartments and 1,348m<sup>2</sup> of non-residential floor space.</li> <li>18 December 2018: The SNPP determined to refuse consent for the DA.</li> <li>18 June 2019: The SNPP approved the DA following a section 8.2 review request.</li> </ul>	Approved by Sydney North Planning Panel on 18th June 2019
DA2021/0212 5 Skyline Place	<ul style="list-style-type: none"> <li>17 March 2021: The applicant lodged DA2021/0212 which sought consent for construction of a 12-storey mixed use development comprising 133 independent living units for seniors, affordable seniors housing and disability housing, and 941m<sup>2</sup> of commercial space.</li> <li>18 August 2021: The SNPP determined to refuse consent for the DA.</li> <li>22 December 2021: The applicant lodged a section 8.2 request to (REV 2021/0045) with relevant amendments.</li> <li>30 May 2022: The SNPP considered the section 8.2 review and refused the DA.</li> <li>31 August 2022: A Class 1 appeal was made to the New South Wales Land and Environment Court (NSWLEC).</li> <li>20 April 2023: The NSW LEC determined to uphold the appeal and approved the following works: <ul style="list-style-type: none"> <li>demolition of the existing structures</li> </ul> </li> </ul>	Approved by NSW LEC on 20 April 2023

Subject site DA	DA summary	Decision
	<ul style="list-style-type: none"> <li>○ construction of two buildings ranging in height from 3 storeys to 7 storeys and containing 98 independent living units including;- 10 units for disability housing to be operated by Project Independence and- 4 affordable housing units for seniors</li> </ul>	

Table 4: DAs relating to surrounding sites

## 2 Strategic context

### 2.1 Strategic justification

This SSDA will directly respond to strategic directions which have been established across the State, regional and local strategic planning frameworks. A number of these strategic themes acknowledge the social vitality of seniors housing and directly relate to this SSDA. Further reference can be found below:

- *Greater Sydney Region Plan*
- *North District Plan*
- *Frenchs Forest 2041 Place Strategy*
- *Hospital precinct structure plan*
- *Towards 2040 Local strategic planning statement* (Northern Beaches LSPS)

There is compelling strategic merit for the proposal, as outlined below:

- **The proposal is consistent with long-standing State level strategic planning objectives**, as contained in the Housing SEPP (and the previous Seniors Housing SEPP), to facilitate the provision of seniors housing given the inflexibility of local planning controls in accommodating this form of development. In this regard, the principles of the Housing SEPP include:

- (a) enabling the development of diverse housing types...*
- (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,*
- (d) promoting the planning and delivery of housing in locations where it will make good use of existing and planned infrastructure and services,*

- **The proposal will increase housing supply and diversity and provide opportunities for older people to continue living in their community**, close to family, friends, services and established health and support networks. The North District Plan identifies Northern Beaches as 1 of 4 LGAs in the District with the largest projected increase in the over 65 population and states:

*“More diverse housing types and medium density housing, as well as the design of walkable neighbourhoods, will create opportunities for older people to continue living in their community, where being close to family, friends and established health and support networks improves people’s wellbeing.”*

The proposal provides for additional seniors housing, including affordable seniors housing, on a site that is demonstrably suitable for this form of development given its proximity to the Northern Beaches Hospital, transport and other services and adjacent approved seniors housing developments.

- **The site is within an identified Health and Education Precinct which is undergoing significant transition.** Frenchs Forest is identified as a Health and Education Precinct in the Greater Sydney Region Plan and North District Plan. Both plans recognise the growth and evolution of Health and Education Precincts

into mixed use innovation precincts, with the clustering of compatible uses which both capitalise on and strengthen the specialist health and employment functions of these precincts. This includes the transition of business parks into higher amenity and vibrant mixed-use precincts, including opportunities for residential development which supports the function of the business park.

The subject proposal is consistent with this provision which recognises that business zones should not be stagnant but should be dynamic places which should evolve to cater for a greater diversity of compatible land uses, including seniors housing.

- **Recent development consents in the locality reinforce the fact that the land use and built form character of the zone is continuing to evolve**, in line with market forces reflecting the recent opening of the Northern Beaches Hospital and the locality's status as a Health and Education Precinct. A summary of the heights of surrounding developments in the Frenchs Forest SP4 zone is provided in the table below.

Address	Use	Approved height	DA ref. (if recent)
5 Skyline Place	Seniors housing and mixed use	RL 184.8/27.3m	REV2021/0045
7 Skyline Place	Seniors housing and mixed use	RL 176.35/24.6m	REV2019/0014
5 Frenchs Forest Road East (Parkway Hotel)	Hotel, retail	RL 187.2/26.4m	DA2015/0901
357-373 Warringah Road (Bunnings Warehouse)	Retail	RL 186.3/25m	DA2020/0717
11 Tilley Lane	Health services facility	RL 172.76/25.6m	DA2017/0711
431 Warringah Road, Part 2	Commercial	RL 168.8/25.55m	N/A
431 Warringah Road, Part 1	Commercial	RL 173.0/19.2m	N/A
49 Frenchs Forest Road East (Genesis Care Oncology Centre)	Health services facility	RL 181.7/21.95m	DA2019/1419
12 Rodborough Road	Commercial	RL 178.41/23.2m	N/A

Table 5: Summary of surrounding building heights in the SP4 zone



### 2.1.1 Alignment to State, district and local strategic plans and policies

The proposed development is aligned with the applicable State, district and local strategic plans and policies as set out below. An in-depth assessment of the proposal against each is at Appendix 5.

State plans and strategies	<ul style="list-style-type: none"><li>• Greater Sydney Region Plan</li><li>• North District Plan 2018</li></ul>
State Environmental planning policies	<ul style="list-style-type: none"><li>• (Biodiversity and Conservation) 2021</li><li>• (Housing) 2021</li><li>• (Planning Systems) 2021</li><li>• (Resilience and Hazards) 2021</li><li>• (Sustainable Buildings) 2022</li><li>• (Transport and Infrastructure) 2021</li></ul>
Local plans and policies	<ul style="list-style-type: none"><li>• Warringah Local Environmental Plan 2011</li><li>• Warringah Development Control Plan 2011.</li><li>• Frenchs Forest 2041 Place Strategy</li><li>• Northern Beaches Local Strategic Planning Statement 2020.</li><li>• Northern Beaches Housing Strategy</li><li>• Northern Beaches Hospital Precinct Structure Plan</li></ul>

Table 6: Applicable statutory and strategic planning policy

## 2.2 Key features of the site and surrounding that could affect or be affected

The site at No. 1 Skyline Place is currently occupied by a large-scale, two storey commercial building with multiple tenancies. No. 3 Skyline Place is occupied by an existing warehouse building which was previously occupied by Miele and operated as a showroom

The site is immediately bound by a mix of land uses, with other approved seniors housing developments west of the site at 5 and 7 Skyline Place, Frenchs Forest. A mixed use and seniors housing development was recently completed at 7 Skyline Place, with construction finished late 2023 and buildings now fully occupied. No. 5 Skyline Place is currently under construction for a mixed use and seniors housing development.

A two storey office and warehouse building at 4 Skyline Place is located immediately west of 3 Skyline Place.

The site has a primary frontage to Skyline Place which is a local road and provides access to the site. Warringah Road forms the southern boundary of the site, however, no access is provided to the site at this as this is a classified road.

Trees and vegetation can be found along the northern, southern and internal lot boundary. The site is not affected by bushfire prone land, acid sulphate soils, mine subsidence or flood hazards.

The site does have some biodiversity values located along the northern boundary of No. 1 Skyline Place. The proposed building envelopes minorly encroach on the biodiversity values land, however, this will be further addressed in the subsequent detailed design and construction DA for this lot. It is noted that the BDAR confirms that the vegetation required to be cleared at No. 1 Skyline Place to facilitate the future development is not significant or identified as remnant vegetation and does not provide habitat for any threatened species.

## 2.3 Potential cumulative impacts

The proposal is considered to have significant, long term community and public benefits through provision of a seniors housing and mixed-use development, which activates the site and allows seniors to age in place. It also improves the relationship with surrounding seniors housing on the western side of Skyline Place (Nos. 5 and 7 Skyline Place), low density residential development north of the site, and the health-related and office uses to the site's immediate east, consistent with the evolving mixed-use nature of the Frenchs Forest Health and Education Precinct.

The key potential cumulative impacts include:

- traffic generation
- construction noise and vibration
- visual impacts

Overall, the impacts to the existing locality and surrounding region are assessed to be relatively minimal and manageable.

The potential cumulative impacts of the project are addressed in Section 6 in accordance with the DPHI *Assessing Cumulative Impacts* guidelines.

## 2.4 Analysis of feasible alternatives

Division 5 of Part 8, Section 192 of the *Environmental Planning and Assessment Regulation 2021* requires an analysis of any feasible alternatives to the carrying out of the development, including any feasible alternatives.

The alternatives to the proposal are set out in the table below.

Option	Assessment
Do nothing	<ul style="list-style-type: none"> <li>• An option to leave the site in its current condition and 'do nothing' was considered and dismissed. This option is inconsistent with the project objectives to: <ul style="list-style-type: none"> <li>○ Provide much needed accommodation for the ageing population of the Northern Beaches LGA;</li> <li>○ Provide seniors housing within a mixed-use development, and support seniors to allow ageing in place;</li> </ul> </li> </ul>

Option	Assessment
	<ul style="list-style-type: none"> <li>○ Provision of high-level amenity for residents and visitors through pedestrian connection within the site and the surrounding locality;</li> <li>○ Create a vibrant, mixed use, community-orientated seniors housing development which is complementary to the strategic objectives of the locality relating to the establishment, growth and evolution of Frenchs Forest Health and Education Precinct;</li> <li>○ Co-location with 5-7 Skyline Place where adjacent approved seniors housing developments comprising services to maximise resident amenity; and</li> <li>○ To provide floor area for contemporary employment generating uses which will serve the needs of local residents.</li> </ul>
Alternative design	<ul style="list-style-type: none"> <li>● A range of options were explored for the design of the proposal, specifically in relation to the location of built form elements to: <ul style="list-style-type: none"> <li>○ minimise impacts on vegetation</li> <li>○ reduce amenity impacts to any adjoining development</li> <li>○ reduce perceived bulk and scale when viewed from the public domain</li> </ul> </li> <li>● The proposed design was selected as it: <ul style="list-style-type: none"> <li>○ reflects the site's size and capacity for a multiple buildings of varying height, with the greatest height located where visual and shadow impacts are minimised</li> <li>○ maximises pedestrian and vehicular connections to the surrounding locality, providing future residents with a high level of accessibility to communal facilities, transport, retail, medical and other services;</li> <li>○ maximises the economic and orderly use of the land in a location that is close to facilities, services and infrastructure;</li> <li>○ provides for large areas of landscaping and deep soil planting, which retains and enhances the tree canopy and provides a high quality landscaped setting for the development;</li> <li>○ ensures exceedance of minimum requirements of amenity aspects under the ADG; and</li> <li>○ maximises amenity for future residents and workers on the site.</li> </ul> </li> </ul>
Alternative location	<ul style="list-style-type: none"> <li>● Given the significant landholding and benefits of co-location of seniors housing with adjacent development, alternate sites for this proposal are not considered appropriate.</li> <li>● Technical analysis and consideration of the project objectives determined that the redevelopment of the existing site was preferred.</li> <li>● Whilst seniors housing is permissible in the Frenchs Forest town centre (which is zoned MU1 Mixed Use in which seniors housing is permissible through the provisions of the Housing SEPP), the development of the town centre is some years away until the</li> </ul>

Option	Assessment
	<p>Forest High School is relocated to its new site in Allambie Heights. Furthermore, as market residential development (shop top housing) is also permissible in the town centre, land values are higher and the development of seniors housing within the town centre is unlikely to be commercially feasible.</p> <ul style="list-style-type: none"> <li>• Similarly, other land the vicinity of the site zoned for residential purposes, including medium and high density residential (and therefore in which seniors housing is permissible through the provisions of the Housing SEPP) is in highly fragmented ownership. These factors mean a seniors housing development of the scale proposed on the site would be difficult to achieve.</li> </ul>

Table 7: Alternative options to the development proposal

## 3 Project description

### 3.1 Project overview

Development consent is being sought for the following:

- a concept proposal for the staged redevelopment of the site over two stages for the purposes of seniors housing and a mix of complementary non-residential employment generating uses; and
- a detailed proposal for the first stage of works at 3 Skyline Place.

The concept proposal comprises:

- six buildings (Buildings A - E) accommodating seniors housing including ILUs, RCF and other complementary employment generating land uses which may include other permissible uses in the SP4 Enterprise zone including community facilities, health service facilities, educational establishment, early education and care facilities, neighbourhood shops, recreation facilities (indoor) and office premises
- approximately 54,546 m<sup>2</sup> of GFA across the buildings (including approximately 1,864m<sup>2</sup> of non-residential floor area within No. 1 Skyline Place and approximately 546m<sup>2</sup> of non-residential floor area within No. 3 Skyline Place)
- 5% of all ILU GFA to be affordable seniors housing units
- large private and public landscaped open spaces
- internal access road and pedestrian pathways
- basement car parking

The detailed proposal for the first stage of works comprises:

- site preparation, including demolition, and earthworks;
- construction of three buildings (Buildings A, B and C) ranging in height from 6 to 14 storeys and comprising seniors housing including 200 ILUs, a RCF in Buildings B and C, associated open space and ground level employment generating floor space in Buildings A and B
- provision of 5% of ILUs as affordable seniors living housing units;
- landscaping; and
- basement car parking.

The location and siting of all buildings under the Concept Plan is shown in Figure 6 below.



Figure 6: Site Plan (Source: Smith & Tzannes)

The proposed development is discussed further in the following sections and detailed within the Architectural Plans at Appendix 7.

Future development beyond the Stage 1 DA will be subject to separate DA/s.

An overview of the project is provided in table below:

Key element	Description
Project area	<p>Site subject to concept application (1 and 3 Skyline Place) has a total area of 2.26 hectares.</p> <p>Site subject to Stage 1 DA (3 Skyline Place) has a site area of 1.14 hectares.</p> <p>The site has a frontage to Skyline Place to the west, which is classified as a local road.</p>
Physical layout and design	<p><b>Concept proposal</b></p> <p>The Concept proposal seeks approval for:</p> <ul style="list-style-type: none"> <li>• six buildings ranging in height from 6-14 storeys</li> <li>• future uses including seniors housing, provision of 5% of residential accommodation as affordable housing, and other permissible land uses in the SP4 zone which may include community facilities, early education and care facilities, health service facilities, and recreation facilities (indoor).</li> </ul>

Key element	Description
	<ul style="list-style-type: none"> <li>approximately 54,546m<sup>2</sup> of floor space across the buildings including approximately 1,200m<sup>2</sup> of non-residential floor area at No. 1 Skyline Place and approximately 500m<sup>2</sup> of non-residential floor area at No. 3 Skyline Place</li> <li>access roads, pedestrian pathways and associated landscaping</li> <li>footprints for at grade and basement car parking</li> </ul> <p><b>Stage 1 proposal</b></p> <p>The proposed Stage 1 works, design and layout consist of:</p> <ul style="list-style-type: none"> <li>demolition of existing buildings and structures</li> <li>30,506m<sup>2</sup> of total gross floor area (GFA) comprising approximately: <ul style="list-style-type: none"> <li>28,139 m<sup>2</sup> of ILUs</li> <li>787m<sup>2</sup> of indoor communal areas</li> <li>1,034m<sup>2</sup> residential aged care facility</li> <li>546 m<sup>2</sup> of non-residential floor space at 3 Skyline Place</li> </ul> </li> <li>provision of 200 ILUs and 20 beds within the RCF</li> <li>provision of 5% of ILU GFA = 1,407 m<sup>2</sup></li> <li>building heights ranging from 6 storeys to 14 storeys/26.9m to 47.7m (noting that the basement under all buildings protrudes more than 1 m above existing ground level at some points)</li> <li>326 car parking spaces</li> <li>Bicycle parking spaces provided on basement floor 1</li> <li>End of trip facilities provided on basement floor 1.</li> <li>site landscaping</li> </ul>
Uses and activities	<p><b>Concept proposal</b></p> <p>The Concept proposal seeks approval for seniors housing and non-residential employment generating uses across the whole site.</p> <p><b>Stage 1</b></p> <p>The proposal seeks approval for independent living units, an RCF, and non-residential employment generating uses at the ground level.</p> <p>As part of the residential component, areas of common open space are provided at ground level including outdoor areas with dense landscaping. An area of common open space is also provided at Level 6 within Building 6 which includes the provision of a pickleball court, vegetable garden and seating areas.</p> <p>Employment generating uses at ground level will include other permissible uses in the SP4 Enterprise zone such as community facilities, health service facilities, educational establishment, early education and care facilities, neighbourhood shops, recreation facilities (indoor) and office premise and will be subject to future approvals in relation to a specific use.</p>
Stages	The development is proposed to be carried out in stages as follows:



Key element	Description
	<ul style="list-style-type: none"> <li>Stage 1 - construction and operation at 3 Skyline Place as detailed in this table.</li> <li>Future stage/s - construction and operation of 1 Skyline Place, subject to future detailed design and consent which would align with the Concept proposal.</li> </ul>

Table 8: Main elements of the project

## 3.2 Detailed description

### 3.2.1 Project area

The site is located at 1 and 3 Skyline Place, Frenchs Forest. The site has frontages to Frenchs Forest Road to the north, Skyline Place to the west, and Warringah Road to the south. Access at the Warringah Road frontage is not available nor possible given it is a classified main road (Main Road 329).

The current structure at 3 Skyline Place, subject to demolition under the proposed Stage 1 works, is a warehouse building formerly occupied by Miele, with associated hardstand car parking located onsite.

3 Skyline Place does not have any environmental constraints that will impact the proposed development of the site. The concept proposal, including 1 Skyline Place, includes biodiversity values land located at the northern boundary of the site. As detailed in the accompanying BDAR at Appendix 17, No. 1 Skyline Place is identified as containing biodiversity values land which does not have any environmental significance.







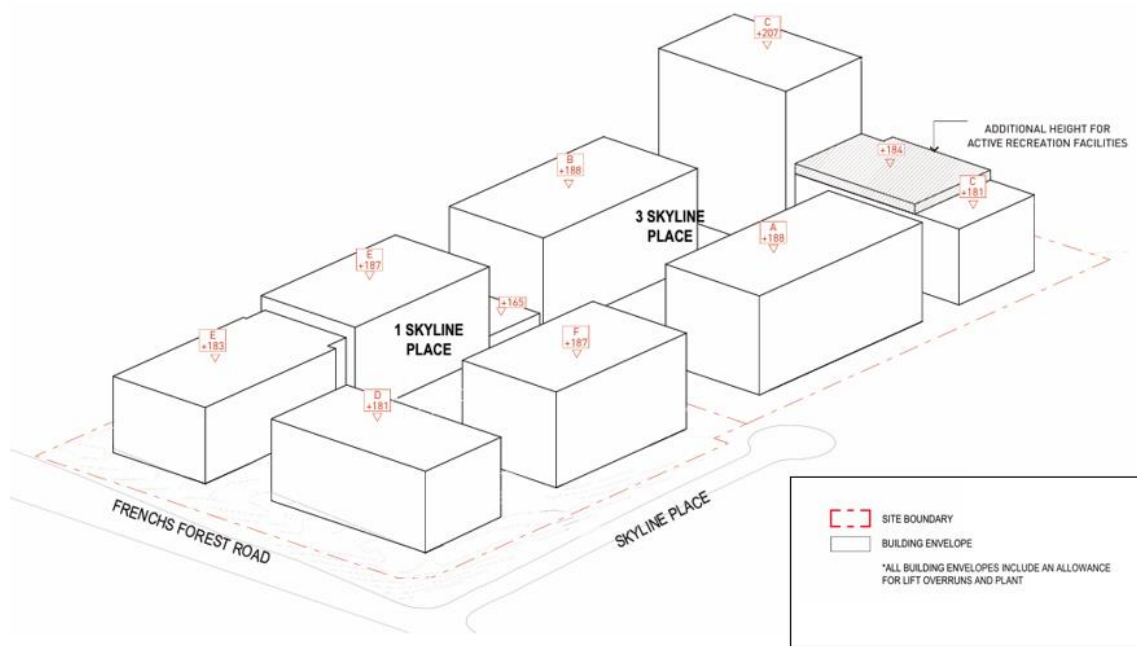


Figure 9: Building Envelopes (Source: STZ Architects)

The above building envelopes have been located and designed to respond to the context of the site. The proposed buildings range in height from 6 to 14 storeys, or 26.9m to 47.7m, and the heights increase from north to south reflecting the site's topography and surrounding land uses. The lower buildings are sited along the northern boundary which responds to the low density residential located to the north of Frenchs Forest Road. These heights also align with the adjacent seniors housing development at 7 Skyline Place.

The highest building is sited at the southern boundary where the site interfaces with Warringah Road, which is a multi-lane arterial road which separates the site from non-residential uses to the south and therefore not a highly sensitive visual environment or in which there are residential uses. Furthermore, it is located at a distance of over 180m from the low density residential area to the north and will be substantially screened by retained and additional tree plantings and other existing and new buildings along Frenchs Forest Road and Skyline Place.

As outlined in the Design Report at Appendix 7, the concept proposal massing strategy has been developed based on feedback from the State Design Review Panel (SDRP), and includes:

- Lower buildings along Frenchs Forest Road and the existing lower scaled residential neighbourhood to the north of the site.
- The boulevard concept and visual continuation of Skyline Place is enhanced through lower scaled buildings along this road
- The tallest building forms are positioned where they have the least visual impact on existing residential neighbourhoods and least overshadowing impact on common areas.

#### Stage 1

The Stage 1 development involves the construction of three buildings ranging from 6 to 14 storeys that will contain a mix of uses including seniors housing ILUs, RCF and non-residential employment generating uses at ground level. Communal spaces will be provided at ground level and Level 6 of Building C (including pickle ball court, seating and vegetable gardens), with car parking also provided at ground level and within three levels of basement.

The proposed buildings under the Stage 1 DA comprise predominant building heights as follows:

- Building A - 8 Storeys - maximum height of 30.4m (RL 187.4)
- Building B - 8 Storeys - maximum height of 31m (RL 187.4)
- Building C - Part 6 Storeys and Part 14 storeys - maximum height ranging from 26.9m to 47.7m (being the tower element) (RL 182.7 to RL 205.1)

(As previously noted, the basement under all buildings protrudes more than 1 m above existing ground level at some points).

As discussed above, the siting of the buildings respects the site's context by locating the taller buildings where the site interfaces with Warringah Road to reduce amenity impacts to any nearby sensitive receivers. The proposal as viewed from Warringah Road is shown in Figure 10 below.



Figure 10: Photomontage of proposal as viewed from Warringah Road, looking north-east (Source: PA Studio)

Figure 11 below shows Buildings A and B as viewed from the north-western corner of the site.





Figure 11: Photomontage of Buildings A and B from north-western corner of the site (Source: PA Studio)

## Landscaping and Open Space

### *Concept*

The intended outcome across the entire site is to provide for an integrated seniors housing development with shared amenities to sit within a densely landscaped context, including a large centralised open space area. This is further bolstered through a carefully designed pedestrian connection network which will also connect the site to the developments at Nos. 5 and 7 Skyline Place. The concept landscaped areas and pedestrian connections are shown in the figure below.

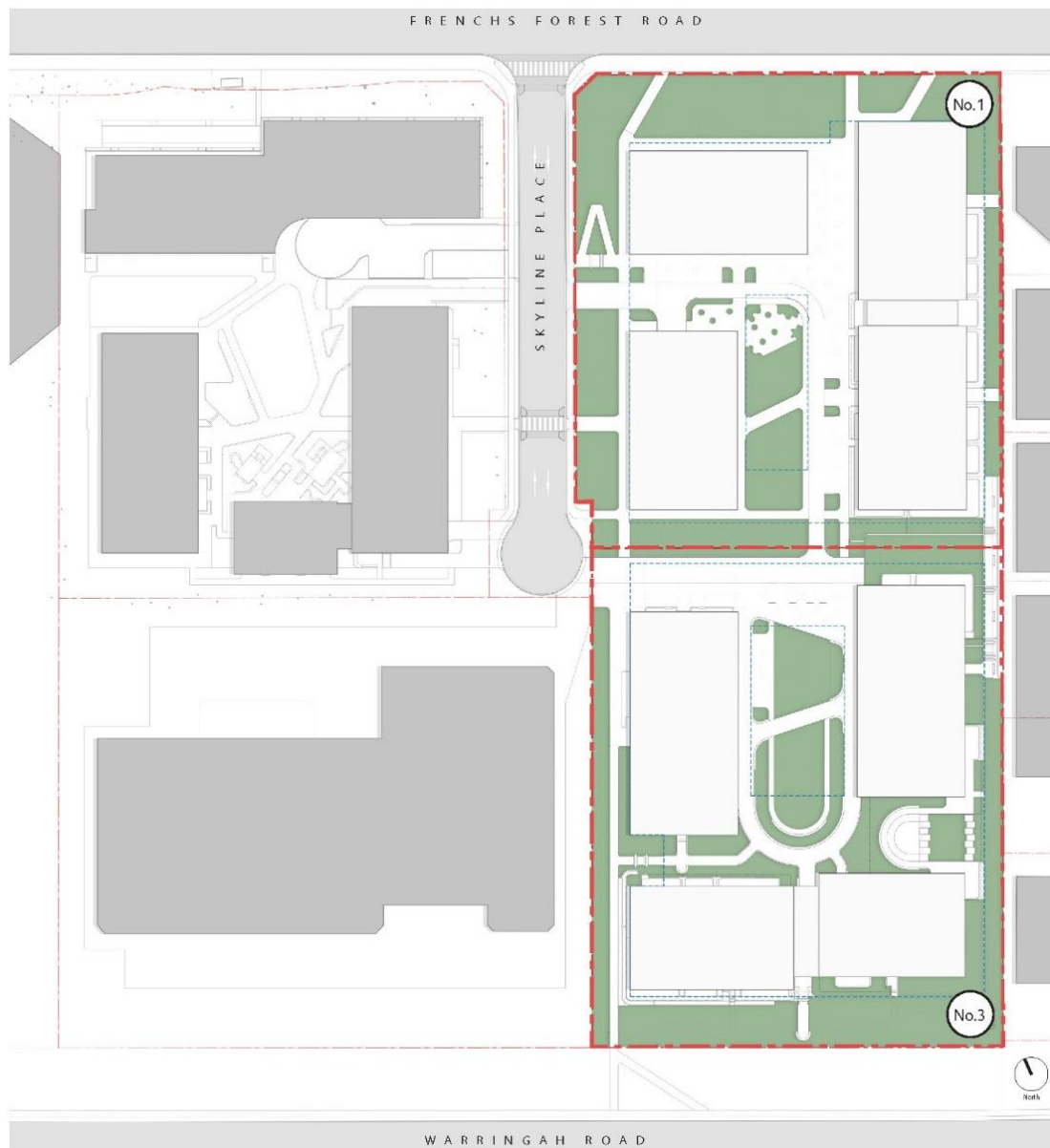


Figure 12: Intended landscaped area and pedestrian connections (Source: Smith & Tzannes and Matthew Pullinger Architect)

The above connections will enable better access to Frenchs Forest Road, which will in turn improve access to surrounding services via utilisation of the bus network.

### Stage 1

The proposal requires the removal of 16 trees within No. 3 Skyline Place to facilitate the redevelopment of the site. Notwithstanding, the proposal also involves the retention of 17 trees within the site which assist in screening and softening the development. Additionally, the proposed landscaping scheme will provide for over 200 new tree plantings. Tree removal and planting is outlined in the accompanying Arboricultural Impact Assessment at Appendix 9 and within the Landscape Plans at Appendix 10.

An extract from the Landscape Plans, showing the proposed landscaped areas under the Stage 1 proposal, is provided in Figure 13 below.

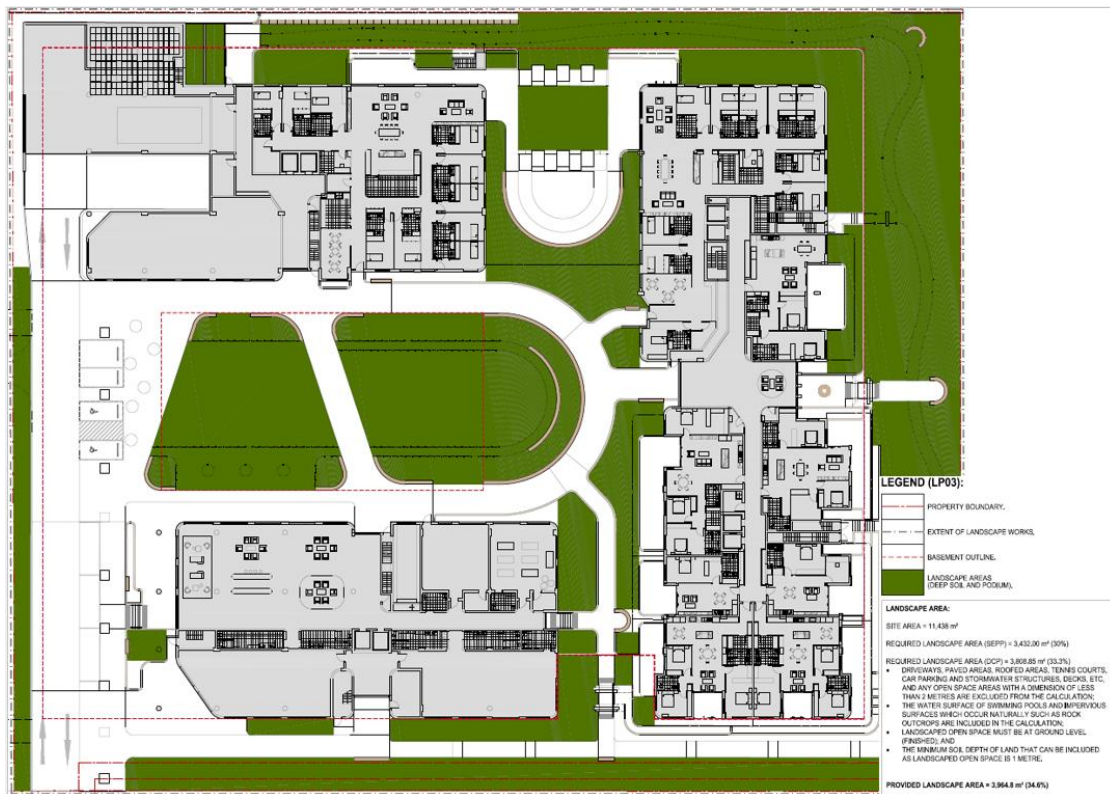


Figure 13 Proposed Landscaped Area (Source: Paddock Landscape Architects)

The proposed landscaping scheme and planting details are included in the Landscape Plan at Appendix 10. The Landscape Plans quantify areas of landscaping, deep soil and areas of communal open space. Compliance with key SEPP and ADG requirements in relation to landscaping are summarised below:

- 34.6% of the site is provided as landscaped area, exceeding the minimum 30% requirement by over 500m²;
- over 21% of the site area is provided as deep soil area, significantly exceeding the minimum requirements under the ADG of 7%; and
- total communal open space under the Stage 1 proposal is 6,085m² across ground level and Level 6.

### Access and parking (Stage 1)

The proposed access to No. 3 Skyline Place is to be facilitated via the existing crossover at the cul-de-sac of the local road.

Once the site is accessed from Skyline Place, cars will utilise the internal private driveway along the northern boundary of the site to access the basement ramp. The basement ramp enables access to the three levels of basement which provides car parking for the ILUs, the RCF, employment generating uses and seniors visitors.

It is noted that there is some provision for parking at-grade, however, this is limited to two accessible parking spaces, a delivery bay and a turning bay. Ambulances will utilise the provided turning bay and delivery bay for parking when accessing the site.



The number of proposed parking spaces within the Stage 1 development, across the 3 basement floors, total 326 spaces. The allocation of these spaces is further discussed at Section 6.5.

### 3.2.4 Uses

The proposed land uses include:

- seniors housing ILUs - a mix of 1, 2 and 3 bedroom apartments for seniors who can live independently. 5% of the residential floorspace occupied by ILUs will be managed by a community housing provider as affordable housing for seniors for 15 years
- RCF - a dedicated high care facility as part of the Stage 1 DA providing 24/7 medical and personal care services for residents in need of such services
- Communal and open spaces for residents - including a large internal courtyard and communal facilities including lounge areas, multipurpose rooms, and rooftop pickleball court and vegetable garden on Building C to be provided in Stage 1
- Non-residential uses including a range of other uses that are permitted in the SP4 Enterprise zone including community facilities, health service facilities, educational establishment, early education and care facilities, neighbourhood shops, recreation facilities (indoor) and office premises. These uses will be determined through future negotiations with potential tenants and further approvals, as required. In the Stage 1 DA, these uses are located at the ground level of Buildings A and B. These non-residential uses are sufficiently related to and will be directly related to the seniors housing component as they:
  - are integrated into the seniors housing buildings, being located on the lower levels, and are therefore not physically separate components of the overall proposal
  - will be functionally related to the seniors housing component as they will provide onsite services to future residents, as well as the broader community

#### *Affordable housing*

As noted above, the applicant proposes to provide affordable housing to be operated by a Community Housing provider for a minimum of 15 years.

The area to be occupied by affordable housing equates to 5% of the occupied by the ILUs which will be owned by the applicant.

The GFA occupied by ILUs is 28,139m<sup>2</sup>. The GFA occupied the affordable housing ILUs in Stage 1 is 1,407m<sup>2</sup> (5% of ILU floorspace).

The location of the affordable housing component is shown on the plans at Appendix 5.

### 3.2.5 Timing

#### Stages

The project will be delivered in at least two stages. It is noted that this proposal only seeks consent for the Concept proposal and Stage 1 works. Works beyond the Stage 1 scope will be subject to a future stage DA/s.

Stage	Proposals
Concept	<ul style="list-style-type: none"><li>• Six buildings accommodating seniors housing including ILUs, RCF, 5% affordable housing provision and employment generating uses.</li><li>• Landscaped open space areas and associated internal pedestrian pathways.</li><li>• Basement parking.</li></ul>
1	<ul style="list-style-type: none"><li>• Stage 1 works including demolition, construction of three buildings facilitating seniors housing ILUs, an RCF, affordable housing units and employment generating uses as outlined in Section 3.1 of this report.</li></ul>
Future stage/s	<ul style="list-style-type: none"><li>• Detailed design and construction of buildings at No. 1 Skyline place, subject to future approval/s.</li></ul>

Table 9: Proposed staging



## 4 Statutory context

This application has been prepared pursuant to Part 4 of the EP&A Act. Further, this application is an SSD application pursuant to section 4.12(8) of the EP&A Act and requires development consent under section 4.15 of the EP&A Act. It is also a concept DA lodged under section 4.22 of the EP&A Act.

The following legislation and environmental planning instruments (EPIs) are relevant to the proposal:

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning and Assessment Regulation 2021*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (Biodiversity and Conservation) 2021*
- *State Environmental Planning Policy (Housing) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021*
- *State Environmental Planning Policy (Planning Systems) 2021*
- *State Environmental Planning Policy (Resilience and Hazards) 2021*
- *State Environmental Planning Policy (Sustainable Buildings) 2022*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *Warringah Local Environmental Plan 2011*
- *Warringah Development Control Plan 2011*

The legislation and EPIs above have been addressed in detail at Appendix 6 and specific key considerations are addressed within the sections below.

Category	Comment
Power to grant approval	<p>In accordance with Schedule 1 of the <i>State Environmental Planning Policy (Planning Systems) 2021</i>, development in the Greater Sydney region that has an EDC of more than \$30 million for purpose of seniors housing that includes an RCF is SSD. An extract from the SEPP is provided below.</p> <p><b>28 Seniors Housing</b></p> <p><i>Development for the purposes of seniors housing if—</i></p> <p><i>(a) the seniors housing component has a capital investment value of—</i></p> <p><i>(i) for development on land in the Greater Sydney region—more than \$30 million, or</i></p> <p><i>(ii) otherwise—more than \$20 million, and</i></p> <p><i>(b) the seniors housing component includes a residential care facility, and</i></p> <p><i>(c) other components of the proposed development are not prohibited on the land under an environmental planning instrument.</i></p>

Category	Comment
Permissibility	<p>The site is zoned SP4 Enterprise under the WLEP 2011. The non-residential uses proposed as part of the Concept and Stage 1 DA will be permissible uses in the SP4 zone, see extract below:</p> <p><i>Permitted with consent</i></p> <p><i>Boat building and repair facilities; Building identification signs; Business identification signs; Community facilities; Early education and care facilities; Educational establishments; Electricity generating works; Environmental protection works; Flood mitigation works; Garden centres; Goods repair and reuse premises; Hardware and building supplies; Health services facilities; Industrial retail outlets; Industrial training facilities; Kiosks; Light industries; Mortuaries; Neighbourhood shops; Office premises; Passenger transport facilities; Public administration buildings; Recreation areas; Recreation facilities (indoor); Recreation facilities (outdoor); Respite day care centres; Roads; Self-storage units; Service stations; Sewerage systems; Signage; Take away food and drink premises; Truck depots; Vehicle body repair workshops; Vehicle repair stations; Vehicle sales or hire premises; Warehouse or distribution centres; Water supply systems</i></p> <p>Although seniors housing is prohibited in the SP4 zone under WLEP 2011, it is permissible with consent on the site under the Housing SEPP.</p> <p>Specifically:</p> <ul style="list-style-type: none"> <li>• section 79 (o1)(viii) of the Housing SEPP states that Part 5 'Housing for seniors and peoples with a disability' of the SEPP applies to land zoned SP4 under the WLEP 2011</li> <li>• clause 80(1)(b) of the Housing SEPP does not apply as the biodiversity value area of the site is not identified on the 'Areas of Outstanding Biodiversity Value register'.</li> <li>• therefore, seniors housing can be carried out with development consent under clause 81(a) of the Housing SEPP</li> </ul>
Other approvals	<ul style="list-style-type: none"> <li>• <i>Roads Act 1993</i>: Clause 138 of the Roads Act 1993 requires approval of the relevant road authority for work in, on under or over a public road. Given Stage 1 proposes road works to Skyline Place, an approval under clause 138 is required. In accordance with clause 4.42(1)(f) of the EP&amp;A Act, this approval must be applied consistently with any consent SSD consent.</li> <li>• <i>Biodiversity Conservation Act 2016</i> (BC Act 2016): A Biodiversity Development Assessment Report (BDAR) has been prepared as part of this SSDA and included at Appendix 17 to satisfy Part 7 of this act.</li> </ul>

Category	Comment
	<ul style="list-style-type: none"> <li><i>National Parks and Wildlife Act 1974</i> (NPW Act): Although an Aboriginal heritage impact permit under section 90 of the NPW Act is not required for SSD (per section 4.41(d) of the EP&amp;A Act), an Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared as part of the SSDA and is included at Appendix 24.</li> </ul>
Pre-condition to exercising the power to gain approval	Pre-conditions to exercising the power to gain approval are discussed at Section 4.1 and addressed in detail at Appendix 6.
Mandatory matters for consideration	Mandatory matters for consideration are discussed at Section 4.2 addressed in detail at Appendix 4.

Table 10: Statutory requirements relevant to the project

## 4.1 Pre-conditions

The table below outlines the pre-conditions to exercising the power to grant approval that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Pre-condition	EIS ref.
<b>Biodiversity Conservation Act 2016</b>	
<p>In accordance with the BC Act 2016, biodiversity impacts must be assessed as part of any SSDA, including the provision of a BDAR where required. Section 7.14 of the BC Act requires the consent authority to take into consideration the likely impact of the proposed development on biodiversity values as assessed in the BDAR.</p> <p>A BDAR has been prepared by Ecologique and is provided at Appendix 17. The BDAR states that proposal will involve the clearing of 0.35 hectares of planted native vegetation which has been assessed under the Biodiversity Assessment Method 2020 (BAM). The assessment under the BDAR concludes that the site does not provide habitat of any importance to threatened and/or migratory species.</p> <p>The BDAR further confirms that the clearing of approximately 0.39 hectares of native vegetation along northern and southern boundaries of the site has been avoided as a result of the proposed design. Mitigation of indirect impacts on biodiversity values will be specified within the Construction and Environmental Management Plan (CEMP). This will also include the requirements for pre-clearances surveys where vegetation clearing will be undertaken.</p>	Section 6.11 Appendix 13
<b>State Environmental Planning Policy (Resilience and Hazards) 2021</b>	
Section 4.6 of the Resilience and Hazards SEPP requires that a consent authority must not grant consent to the development on any land unless:	Section 6.10 Appendix 23

Pre-condition	EIS ref.
<ul style="list-style-type: none"> <li>• it has considered whether the land is contaminated.</li> <li>• 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</li> <li>• 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.</li> </ul> <p>A Preliminary Site Investigation (PSI) has been provided as part of this EIS at Appendix 23. The PSI identifies areas of potential environmental concern within the site as a result of potential importation of uncontrolled fill, pesticide uses, vehicle parking, metal degradation, chemical storage, leaks from substation, current &amp; former site activities, onsite migration, and current &amp; former asbestos based building products. Any contaminants that may be present within the site were considered to be of low significance, however, it is recommended that a Detailed Site Investigation (DSI) be required as a condition of consent.</p>	
State Environmental Planning Policy (Transport and Infrastructure) 2021	
<p>The Transport and Infrastructure SEPP aims to facilitate the effective delivery of infrastructure in NSW and to ensure development does not have a significant impact on the function of surrounding road networks. Alternatively, it also seeks to ensure development can mitigate any noise impacts from surrounding infrastructure.</p> <p>Section 2.119 requires the consent authority to ensure that development with a frontage to a classified road has access provided by a road other than the classified road where practicable and that the ongoing operation of the classified road will not be adversely affected by proposed development. The site fronts Warringah Road, however, no access is proposed to the classified road. An assessment of the impact of the proposal on the surrounding road network is provided within the accompanying Transport and Accessibility Impact Assessment, as well as within this EIS.</p> <p>Section 2.120 stipulates that the consent authority must not grant consent for residential development adjacent to a road corridor with an annual average daily traffic volume of more than 20,000 vehicles unless appropriate noise mitigation measures will be taken that provide for an acceptable acoustic environment.</p> <p>The proposal has been accompanied by a Noise and Vibration Impact Assessment prepared by Acoustic Logic as provided at Appendix 14, which recommends appropriate noise mitigation treatments to ensure that future residential apartments achieve an acceptable noise environment and residential amenity.</p>	<p>Section 6.5 Appendix 4 Appendix 12</p>

Pre-condition	EIS ref.
Section 2.121 requires the consent authority to provide TfNSW with written notice of the development application for developments considered a 'traffic generating activity'. The proposed development is a 'traffic generating activity' as it the concept proposal will provide for over 300 dwellings in the form of ILUs. It is noted that the Stage 1 approval seeks consent for only 200 dwellings and the 20 bed RCF, however, the total residential dwelling provision across the Concept will exceed the minimum 300 dwelling threshold as specified in Schedule 3 of the SEPP.	
Section 2.48 of the Transport and Infrastructure SEPP requires the consent authority to give written notice to the relevant electricity supply authority and take into consideration any response to that notice before granting consent to a development likely to affect an electricity transmission or distribution network.	N/A

Table 11: Pre-conditions

## 4.2 Mandatory considerations

The table below outlines the relevant mandatory considerations to exercising the power to grant approval, that are applicable to the project and the relevant section where these matters are addressed within this EIS.

Mandatory consideration	Comment	EIS ref
Environmental Planning and Assessment Act 1979		
Relevant objects of the Act (Section 1.3)	<p>The proposed development is consistent with the objects of the EP&amp;A Act for the following reasons:</p> <ul style="list-style-type: none"> <li>It facilitates the orderly economic development of the land for seniors housing, which is permissible pursuant to the provisions of the Housing SEPP, and provides for a high quality, contemporary model of care which allows seniors to age in place.</li> <li>It provides employment opportunities throughout the construction and operational phase of the development, including higher order jobs which reflect the nature of the Health and Education precinct in which the site is located.</li> <li>It facilitates ecologically sustainable development as outlined in the accompanying ESD Report.</li> <li>It provides for 5% of the floor space for ILUs as affordable housing.</li> </ul>	Appendix 4

Mandatory consideration	Comment	EIS ref
Relevant environmental planning instruments (Section 4.15)	The proposal seeks development consent under Part 4 of the Act. This EIS addresses all matters for consideration under Section 4.15 of the Act.	Appendix 4
State Environmental Planning Policy (Biodiversity and Conservation) 2021	<p>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 have minimal impact on biodiversity, ecology and environment. The proposed stormwater and water quality as well as landscaping scheme have considered the biodiversity of the site and its surrounding.</p> <p>The proposal intends to improve pedestrian access and permeability across the site contributing to future resident amenity. Further, the project can be comfortably integrated into the site ensuring it will not impact prevailing views as discussed in the Visual Impact Assessment accompanying the EIS.</p>	Section 6.11 Appendix 4 Appendix 13
<ul style="list-style-type: none"> <li>State Environmental Planning Policy (Housing) 2021</li> </ul>	<p>The site is zoned SP4 Enterprise and the proposal is permissible with consent pursuant to the provisions of the Housing SEPP.</p> <p>The proposal also complies with all relevant development standards prescribed under Chapter 3, Part 5, Division 3 for ILUs and the RCF. It also meets all site-related requirements under Division 4 of this part.</p> <p>A detailed assessment of compliance with the applicable seniors housing provisions under the Housing SEPP is provided at Appendix 4.</p>	Appendix 4
<ul style="list-style-type: none"> <li>State Environmental Planning Policy (Planning Systems) 2021</li> </ul>	The proposal is identified as SSD under Schedule 1 clause 28 of the Planning Systems SEPP, as it is development for the purpose of seniors housing with capital investment of more than \$30 million in the Greater Sydney region and includes a RCF.	Appendix 4

Mandatory consideration	Comment	EIS ref
	Additionally, Section 4.5 of the EP&A Act and Section 2.7 of the State Environmental Planning Policy (Planning Systems) 2021 stipulate that the consent authority is the Minister for Planning (or DPHI as their delegate) unless the development triggers the matter set out in Section 2.7(1) in which case the consent authority will be the Independent Planning Commission.	
Relevant Development control plans (Section 4.15)	<i>Warringah Development Control Plan 2011</i> applies to the land.  While development control plans do not apply to SSD under Section 2.10 of the Planning Systems SEPP, the DCP controls have been considered.	Appendix 4

Table 12: Mandatory considerations

### 4.3 Consolidated Northern Beaches Local Environmental Plan

At its meeting on 17 June 2024, Northern Beaches Council resolved to submit a Planning Proposal (PP) for the new, consolidated Northern Beaches Local Environmental Plan (NBLEP) to the Minister for Planning and Public Spaces for 'Gateway Determination'.

Under the NBLEP, new controls are proposed for the Frenchs Forest Business Park. This includes a new height development standard of 11m and an increased height provision of 21m for 'employment generating development'. The NBLEP does not propose an FSR for the site.

It is noted that the PP was submitted to DPHI on 21 June 2024 and is yet to receive Gateway determination. Given the current status, the NBLEP has not been publicly exhibited as a Draft LEP and therefore has no statutory weight under Section 4.15 of the Act. Therefore, while the provisions have not been formally assessed as part of this EIS, building heights including consideration of the draft provisions under the NBLEP, are considered in detail at Section 6.1.

### 4.4 Contributions

The *Northern Beaches Section 7.12 Contributions Plan 2024* (NBCP) applies to the site. The applicable rates under the NBCP are 1% of the cost of the development. The payable contributions under the NBCP are to be imposed on any consent granted for the proposal.



## 5 Engagement

### 5.1 Engagement carried out

The engagement program has been conducted in accordance with the Department of Planning, Housing and Infrastructure's *Undertaking Engagement Guide: Guidance for State Significant Projects* and complies with the community engagement requirements in the SEARs.

A detailed Engagement Report has been prepared by Left Field Communications and is at Appendix 24: Engagement Report 24. A summary of the engagement undertaken with all relevant stakeholders as presented in the Engagement Report is provided below. The level of engagement described below is in accordance with the International Association for Public Participation (IAP2) *Spectrum of Public Participation*.

Stakeholder	Level of engagement	Key matters of discussion
Department of Planning, Housing and Infrastructure	Involve - <ul style="list-style-type: none"> <li>○ Meeting</li> <li>○ Email</li> </ul>	<ul style="list-style-type: none"> <li>• Alignment with policies and priorities,</li> <li>• Adherence to planning and design legislation</li> <li>• Consultation and engagement with relevant stakeholders</li> <li>• Permissibility and uses</li> </ul>
Transport for NSW	Consult - <ul style="list-style-type: none"> <li>○ Email</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic, access and parking - in particular heavy vehicle trips to and from site during construction</li> <li>• Capacity of road networks and intersections in the vicinity of the site and the ability of surrounding roads to cater for the proposal</li> </ul>
Northern Beaches Council	Consult <ul style="list-style-type: none"> <li>○ Email</li> </ul>	<ul style="list-style-type: none"> <li>• Local planning compliance</li> <li>• Alignment with strategic planning</li> <li>• Impacts to the local community including noise, congestion, traffic.</li> <li>• Flooding and Stormwater</li> <li>• Local Benefits.</li> </ul>
Surrounding landowners and occupiers, including immediate neighbours	Consult, Inform and Involve <ul style="list-style-type: none"> <li>○ Letter</li> <li>○ Survey</li> <li>○ Workshops</li> </ul>	Hosted 1 hour and 3-hour webinar for community members to learn about project. Key issues include: <ul style="list-style-type: none"> <li>• Design and Safety</li> </ul>

Stakeholder	Level of engagement	Key matters of discussion
		<ul style="list-style-type: none"> <li>• Apartment Quality</li> <li>• Traffic and Safety</li> <li>• Construction Impact</li> <li>• General Feedback</li> </ul>
State Design Review Panel (SDRP)	Consult <ul style="list-style-type: none"> <li>○ Meeting</li> </ul>	<ul style="list-style-type: none"> <li>• Design quality and adherence to the principles of design excellence</li> <li>• Impact on the local urban environment and integrates with surrounding land uses</li> <li>• Inclusion of community-oriented design features that foster inclusivity, connectivity, and accessibility</li> <li>• Visual, environmental, and functional impacts of the development.</li> <li>• SDRP Meetings are further discussed in Section 5.4</li> </ul>
Heritage & First Nations	Involve <ul style="list-style-type: none"> <li>○ Site meetings</li> <li>○ Email</li> </ul>	<ul style="list-style-type: none"> <li>• Potential for impact on cultural heritage or significant sites</li> <li>• How Aboriginal culture and heritage is reflected/ responded to in project design\</li> <li>• Preparation of ACHAR involving consultation with relevant LALCs</li> </ul>
Government Architect's Office (GAO)	Consult - <ul style="list-style-type: none"> <li>○ Email</li> </ul>	<ul style="list-style-type: none"> <li>• The development's alignment with state-level urban design principles and best practices.</li> <li>• Inclusion of innovative, sustainable, and resilient design approaches</li> <li>• Integration of Connecting with Country principles to reflect cultural and environmental heritage.</li> <li>• The development's commitment to delivering long-term public and community benefits</li> </ul>

Table 13: Consultation undertaken to date with relevant stakeholders

## 5.2 Community views

As noted in Table 13 above, two community drop-in sessions were held to facilitate engagement with community members about the proposed development at 1-3 Skyline Place and receive feedback on the proposal.

Session 1 included:

- 6 residents from Jardin, small group, seated discussion around print outs of proposed plans and attendees invited to share contact information

Session 2 included:

- A longer format of 3 hours with 44 residents from Jardin, Platino and consultant representatives engaged with guests and attendees invited to share concerns or thoughts on post-it notes or with the team. They were invited to share contact information.
- The key issues raised are listed in the table below with concerns:

Key Issue	Discussion
Design and Safety	<ul style="list-style-type: none"> <li>• Concerns about existing provision of inadequate open and green spaces compared to what was promised.</li> </ul>
Traffic and Safety	<ul style="list-style-type: none"> <li>• Increased traffic raises concerns about pedestrian safety, especially crossing Skyline Place and French's Forest Road.</li> </ul>
Construction Impact	<ul style="list-style-type: none"> <li>• Potential noise, vibrations, and structural safety concerns during construction.</li> <li>• Need for effective traffic management during and post-construction.</li> </ul>
General	<ul style="list-style-type: none"> <li>• Importance of retaining green spaces.</li> <li>• Garbage collection areas should not cause noise or odour disturbances for residents.</li> <li>• Suggestions to align building heights with existing structures for aesthetic consistency.</li> </ul>

Table 14: Feedback from community drop-in sessions

In response to the above feedback, the following mitigation measures have been implemented into the design and management of the future construction of the proposal:

- Provision of improved pedestrian access to Frenchs Forest Road, entailing internal pedestrian network and external road crossings which will connect the site to pedestrian connections within adjacent development at Nos. 5 and 7 Skyline Place. Furthermore, in accordance with the SEAR's, the Transport and Accessibility Impact Assessment analyses the impacts of the proposal on the

local road network to ensure compliance with Council and TfNSW requirements is achieved;

- A Construction Traffic Management Plan has been prepared to manage traffic during the construction phase;
- Post-construction traffic management is assessed in the Transport and Accessibility Impact Assessment and demonstrates the impact on the surrounding local road network to be negligible;
- Retention of existing trees has been considered with high priority, including retention of majority of trees at the site with plans to provide additional plantings in accordance with the Landscape Plans.
- Garbage collection has been carefully considered to mitigate noise/odour disturbance.
- Building heights proposed at No. 1 Skyline Place presenting to Frenchs Forest Road and interfacing with low density residential area to the north are consistent with adjacent heights at 7 Skyline Place.
- The proposed 14 Storey tower is in the south-eastern corner of the site adjacent to Warringah Road to reduce any potential impacts to surrounding receivers.

It is noted that some comments made at the community drop-in related to the existing development approvals at Nos. 5 and 7 Skyline Place which are not proposed to be modified by this proposal.

### 5.3 Engagement to be carried out

The Applicant will continue to keep stakeholders and the community informed of the project approval process through the exhibition and determination phases by:

- Short Online Surveys: quick, accessible input collection
- Community Drop-in Sessions: Regular informal sessions at local venues.
- Dedicated Engagement Liaison: Point- of - contact for ongoing stakeholder concerns
- Enhanced Digital Platforms: Interactive project website with real-time updates and Q&A.

### 5.4 State Design Review Panel Engagement

During the consultation period, the Applicant presented the proposal to the SDRP on two separate occasions.

It is noted that the SDRP provided support for a number of the proposed design elements with feedback provided which has now been addressed in the final proposed design. A summary of the SDRP comments and response, as presented in the Design Report, is provided in Table 15 below.

SDRP Comment	Response
SDRP Meeting 1 - 21 August 2024	

SDRP Comment	Response
<i>Continuing engagement with the knowledge holders - Gaimaragal</i>	<i>Engagement with Gai-maragal knowledge holders has continued, ensuring cultural values and knowledge are embedded in the design. This has influenced landscape treatments, site interpretation, and material selections, fostering a deeper connection to Country.</i>
<i>Refine site strategy particularly ground plane</i>	<i>The site strategy has been refined to enhance pedestrian movement, access, and placemaking. The ground plane is activated with integrated landscaping, clear sightlines, and improved wayfinding, creating a more cohesive and engaging public realm.</i>
<i>Provision of the detailed masterplan with or without #4 Skyline</i>	<i>A comprehensive masterplan has been developed, with flexibility to accommodate or exclude No. 4 Skyline Place. This ensures clarity in staging, infrastructure coordination, and long-term site vision, allowing for adaptability in future planning.</i>
<i>Create clear hierarchy of open spaces</i>	<i>The open space network now follows a clear hierarchy, with defined communal spaces, private courtyards, and green linkages.</i>
<i>Respond to RACF isolation and amenities</i>	<i>Communal spaces have been relocated and reoriented to improve sunlight access, views, and connectivity to shared amenities, fostering interaction and well-being.</i>
<i>Interrogate the building height/density and distribution options and proposed amenities</i>	<i>A range of height / massing and density options were considered by the design team to ensure that a thorough analysis of all potential options was undertaken. These options were presented to the second Panel meeting.</i>
<i>Establish sustainability agenda and how sustainability initiatives will be addressed in the architecture and landscape</i>	<i>A sustainability framework has been embedded within the architecture and landscape design, focusing on passive design strategies, energy efficiency, water management, and biodiversity enhancement. Initiatives such as green roofs, solar integration, and water-sensitive urban design reinforce the project's long-term environmental performance.</i>
SDRP Meeting 2 - 6 November 2024	

SDRP Comment	Response
<i>The existing tree canopy provides a strong connection to Country and should be emphasised. Provide justification for built form that extends above the canopy level</i>	<i>Taller buildings allow for a lesser footprint and a greater amount of open space. Increased height allows for better views, improved daylight access, enhanced cross-ventilation, and the creation of larger communal open spaces at ground level</i>
<i>Provide long sections that include the town centre, hospital, and nearby hotel to illustrate how the proposed built form sits on the ridgeline and how it relates to existing and future built form.</i>	<i>Please see sections by Paddock Landscape Architects which demonstrate that the proposed height aligns with existing and future developments along the ridgeline, maintaining visual consistency with the broader precinct</i>
<i>The proposed FSR is currently higher than the FSR control for the Frenchs Forest town centre. Provide justification supported by detailed contextual analysis, including existing and future character studies, to demonstrate why the site should accommodate a higher density than the town centre.</i>	<i>The increased FSR supports the precinct's role as a key health and aged care hub, facilitating high-quality seniors living while preserving significant open space. The scheme proposes an FSR of 2.66:1, whereas the town centre has an FSR of 2.75:1.</i>
<i>If a taller tower is deemed to be contextually appropriate (following a detailed urban analysis as per items 2 and 3), explore options to reduce the bulk of the built form by proposing a slender 'point' tower that has the potential to achieve design excellence. This may allow for more open space at ground level and increased building separation distances.</i>	<i>The taller tower at 3 Skyline Place (fronting Warringah Road) has been designed as a slender point tower, reducing visual bulk while maintaining urban design integrity. Its smaller footprint enhances separation between buildings, improving natural light penetration, airflow, and skyline articulation. Its architectural expression emphasizes verticality, with strategic material use and fragmentation of form to further diminish perceived mass and enhance visual interest.</i>
<i>Test and provide detail on the proposed building envelope GBA and GFA ratios and ensure articulation zones are appropriately generous.</i>	<i>The envelopes are sufficiently sized to accommodate the detailed design on 3 Skyline Place, and the same ratio has been applied to 1 Skyline Place, ensuring high levels of resident amenity and compliance with design excellence standards.</i>
<i>Break up the length of the buildings to provide more visual permeability from the central open space and the north-south pedestrian boulevard and better amenity for the ILUs.</i>	<i>Building envelopes have been segmented to create visual breaks, improve sightlines, and enhance the pedestrian experience along the boulevard. Taller elements with greater visual impact have a reduced footprint</i>

SDRP Comment	Response
<i>Provide a detailed comparison to demonstrate that a scheme with increased height can provide a higher level of amenity, and better sustainability and urban design outcomes. For example, provide comparative testing of a 4-6 storey scheme and a 6-8 storey scheme.</i>	<i>This analysis formed part of the SDRP2 package. A comparison of 4 options was provided to show how taller buildings resulted in smaller footprints and greater opportunities for deep soil and building separation.</i>
<i>Clearly annotate the drawings to show existing trees to be retained (including TPZs), trees to be removed, and new trees proposed.</i>	<i>Plans identify retained trees, new plantings, and trees requiring removal, ensuring minimal disruption to the existing canopy and integration with the landscape.</i>
<i>Demonstrate that the proposed building setbacks are sufficient to allow existing trees to thrive, noting that Option 4 has a reduced setback to the southern boundary.</i>	<i>The buildings have been strategically set back from the site boundaries to allow for the retention of significant trees, particularly along the Frenchs Forest Road corridor and to the south along Warringah Road. This approach maintains the established landscape character, enhances visual amenity, and reinforces the green buffer along these key frontages.</i>
<i>Ensure that side boundary setbacks will enable future development on adjacent sites.</i>	<i>Setbacks have been designed in accordance with ADG requirements to ensure adequate building separation for privacy, solar access, and ventilation. This allows for future redevelopment of adjacent sites while maintaining appropriate spatial buffers between buildings.</i>
<i>Analyse the height of the buildings facing Frenchs Forest Road and consider whether they should be lowered to respond to the canopy height and the low-density residential area opposite.</i>	<i>These building envelopes have been lowered to 6 storeys - inline with the built form at 7 Skyline Place. These buildings are limited in height to transition to the lower-density residential area and align with the tree canopy.</i>
<i>Illustrate the staging strategy and describe the arrival experience for No. 3 Skyline Place prior to the completion of No. 1 Skyline Place.</i>	<p><i>No. 3 Skyline Place prior to the completion of No. 1 Skyline Place. The arrival experience for No. 3 Skyline Place has been designed to function independently prior to the completion of No. 1 Skyline Place.</i></p> <p><i>A dedicated entry point, clear wayfinding, and an interim drop-off zone ensure seamless access. Pedestrian and vehicle movement are carefully planned to avoid disruption, with safe, well-lit pathways and landscaping to enhance the arrival experience</i></p>



SDRP Comment	Response
<i>Review the planning to ensure that internal common areas are not solely south-facing and receive adequate solar access in winter.</i>	<i>Communal areas have been positioned to maximise northern light, with large windows and courtyards enhancing solar access.</i>
<i>Revisit the location of the RACF communal open space and provide shadow diagrams that clearly illustrate the level of solar access in mid-winter.</i>	<i>Communal open spaces have been positioned to ensure year-round usability, with shadow studies confirming good winter sunlight access.</i>
<i>Ensure that residents' bedrooms are not overlooked from public areas.</i>	<i>Screening, window positioning, and landscape buffers have been incorporated to protect resident privacy.</i>
<i>Confirm that the dual-plan arrangement, which will result in the duplication of front-of-house functions and back-of-house services, is acceptable to a future operator.</i>	<i>The layout has been reviewed with potential operators to confirm efficiency in staffing, services, and resident movement.</i>
<i>Demonstrate how visitors to the RACF will pick up and drop off residents by vehicle and by foot.</i>	<i>A dedicated drop-off area at basement level and a direct entry path at ground level ensure seamless access for visitors and transport services. Emergency services have access from the basement level or along the shared path at 3 Skyline.</i>
<i>Consider the transitions between the courtyard and the buildings, including active edges, privacy, landscape buffers, colonnades, and covered walkways.</i>	<i>Awnings, wide pathways, landscape buffers, and active frontages have been incorporated to create a smooth transition between built and open spaces.</i>
<i>Ensure that common corridors and lobbies have access to natural light and outlook. Demonstrate how the outlook from corridors aligns with significant views to the sky and connects with Country</i>	<i>Glazed lobbies look out to landscaped spaces providing natural light and views, reinforcing connection to Country.</i>
<i>Give each building a unique character and create variation in the facades by designing them in response to their different climatic orientations and outlook.</i>	<i>Buildings feature distinct material palettes and façade articulation based on solar orientation and outlook.</i>
<i>Encourage a greater variety of building types by responding to the different conditions of the site, i.e., the eastern perimeter buildings, central buildings, and street buildings.</i>	<i>A mix of perimeter (street) and courtyard buildings, point tower and lower buildings, respond to site conditions and optimise residential diversity</i>
<i>Ensure that building recesses are generous enough to provide effective cross-ventilation.</i>	<i>Deep recesses and operable windows enhance airflow and natural ventilation.</i>

SDRP Comment	Response
<i>Provide articulation and setbacks at the upper levels and create generous roofscapes.</i>	<i>Upper-level setbacks reduce visual impact, improve proportions, and allow for rooftop communal spaces.</i>
<i>Provide an analysis of how the scheme responds to Schedule 8 of the Housing SEPP (2021) 'Design principles for seniors housing' and the Seniors Housing Design Guide.</i>	<i>The proposal aligns with key principles, ensuring high-quality seniors living with a focus on accessibility, landscape integration, and community amenity. A detailed assessment has been undertaken within the Design Report at Appendix 7.</i>

Table 15: SDRP comments and response

## 6 Assessment and mitigation of impacts

This section provides an assessment of the environmental impacts associated with the proposed seniors housing development. The environmental assessment is based on a number of specialist studies undertaken for development.

This section provides a summary of the results of the assessment undertaken for the key issues identified by the SEARs.

Proposed mitigation measures are provided at Appendix 2.

### 6.1 Built form

The proposed Architectural Plans for the development are included at Appendix 5. In addition, a Design Report has been prepared by Smith & Tzannes and Matthew Pullinger Architect and is included at Appendix 9.

The key built form elements of the proposal comprise:

- Residential Flat Buildings: 6 buildings providing independent living units for seniors and a residential aged care facility.
- Employment-Generating Uses: non-residential spaces fronting Frenchs Forest Road and Skyline Place at ground level.
- Public and Communal Spaces: key elements include a large publicly accessible central courtyard designed for social interaction and resident engagement, a rooftop garden and attached communal space and smaller communal spaces at ground level that front the central open space.
- Basement Facilities: Storage, car parking, and bicycle parking to support residents and visitors.

The proposed development achieves a high quality built form and urban design outcome that is consistent with the site's immediate context and the vision for the site as outlined within the accompanying Design Report. The accompanying Design Report further outlines how the design implements the principles of the *Seniors Housing Design Guide 2023* to achieve an outcome that best suits the needs of future residents within both the ILU and RCF components.



Figure 14: Photomontage sketch of internal courtyard (Source: PA Studios)

The intended goal of the proposal is to deliver an appropriate development solution that leverages the strategic merit of the site, enabling additional seniors housing that aligns with the objectives and vision of the applicable strategic planning framework and the principles of the Housing SEPP. The current proposal is part of a broader Skyline Place precinct, inclusive of Nos. 5 and 7 Skyline Place, aligned with a vision for a health-focused urban renewal of the locality which provides high quality, sustainable and supportive housing and facilities for seniors.

The proposal's design strategy has been established as a result of consultation with the SDRP, as well as the Housing SEPP, ADG and Seniors Housing Design Guide (a comprehensive assessment against the relevant provisions of these documents is contained in the Design Report at Appendix 7).

The key principles of the design strategy for the proposal are:

#### **Optimised Site Planning**

- *Development will maximise the building separation to enhance outlook, sightlines and views of the sky.*
- *Existing trees along Frenchs Forest Road are retained to maintain deep soil networks.*
- *Water management strategies are incorporated to support sustainability and landscape resilience.*

#### **Sustainability and Environmental Considerations**

- *Extensive landscaped areas designed for the mitigation of urban heat island effect (UHI), enhance environmental sustainability, and improve the thermal comfort for residents and workers.*
- *Water management strategies, including stormwater reuse for irrigation.*

## **Built form and Scale**

- *Concept design includes varied building heights, allowing a transition from lower structures near the residential areas to taller elements within precinct. Lower buildings front the Frenchs Forest Road, maintaining a respectful relationship with surrounding context.*
- *Tallest building elements are positioned to minimize overshadowing and enhance wind protection for central communal space.*
- *Perimeter block form is utilised, integrating first-stage development and providing a strong visual identity.*
- *Stage 1 DA, supporting the transition from independent living to aged care without leaving the community, enforcing social support for aging residents.*
- *RCF is positioned centrally, providing easy access while shielding the private residential spaces.*

## **Accessibility and Circulation**

- *A 'Green Boulevard' is introduced along Skyline Place, linking the new development with communal facilities at stages 1 and 3.*
- *Internal boulevard connects courtyards and public spaces, fully accessible pedestrian links that ensure mobility for residents.*
- *Internal roadway. Dedicated zones for emergency and service vehicle access.*

### **6.1.1 Building Height**

The site does not have any applicable height control, providing an opportunity for increased heights where impacts are minimal and can be used to provide more slender tower forms with additional landscaping and open space opportunities at the ground level. Given the site's frontage to Warringah Road, a transport corridor bound by SP4 Enterprise zones in Frenchs Forest, there are no sensitive receivers in close proximity to the highest point of the proposal.

The proposed buildings under the Stage 1 proposal range in height from 26.9-47.7m across the site, with height appropriately sited with respect to surrounding land uses. The siting of buildings and respective heights has been designed to reduce visual impacts on the surrounding locality. The proposed height is consistent with the adjoining seniors housing developments located at Nos. 5 and 7 Skyline Place.

The Design Report outlines a massing strategy with varied heights and enhanced landscaping which ensures that the concept development appropriately sites buildings relative to adjoining neighbours and associated impacts. The massing strategy has been developed to:

- provide lower heights at the site's interface with Frenchs Forest Road noting the low density residential areas located to the north;
- provision of a 'boulevard concept' within Skyline Place, with lower buildings adjacent to the street frontage to provide for a visual continuation;
- taller scale buildings have been sited where visual impacts are lesser and have the least amenity impact on low density residential areas to the north;



- height and scale of buildings on eastern boundary (specifically future Building 1E and proposed Building 3B) assist in reducing wind to the centralised communal open space; and
- the tower form fronting Warringah Road is provided with articulation through different building elements and materials as proposed under the Stage 1 works.

The massing strategy as detailed in the Design Report is provided in the figure below.



Figure 15: Massing strategy across concept proposal (Source: Smith & Tzannes and Matthew Pullinger Architect)

Across the three buildings proposed under the Stage 1 proposal, building heights range as follows:

- Building A - 8 Storeys - maximum height of 30.4m (RL 187.4)
- Building B - 8 Storeys - maximum height of 31m (RL 187.4)
- Building C - Part 6 Storeys and Part 14 storeys - maximum height ranging from 26.9m to 47.7m (being the tower element) (RL 182.7 to RL 205.1)

The proposed heights within Stage 1 are shown in Figure 16 below.



Figure 16: 3D Model of Stage 1 (Source: PA Studio)

As shown above, the proposed building heights provide an appropriate transition in height, with lower-scale buildings adjoining the future development at No. 1 to appropriately integrate the two developments. This integration of the lower scale buildings also ensures that shared communal open spaces will achieve high levels of amenity. The tallest form has been positioned along Warringah Road to provide a cohesive built form outcome with the larger-scale health and commercial buildings that present to this frontage in the precinct. As demonstrated by the accompanying shadow diagrams and the assessment under Section 6.2 below, the siting of the tallest building ensures the best outcome in maintaining amenity for surrounding receivers.

It is noted that the NBLEP, currently being assessed by DPHI and yet to receive Gateway determination, will apply an 11m maximum height at the site with a further allowance for a 21m maximum height for 'employment generating development'. As discussed in Section 2, the Frenchs Forest Business Park continues to evolve and the examples of consents presented in Table 5 demonstrate clear departures from the proposed maximum building height.

### 6.1.2 ADG Compliance

Notwithstanding that the ADG does not explicitly apply to the proposal, a detailed assessment of the proposed development against the provisions of the ADG has been undertaken as part of the Design Report at Appendix 7. This assessment demonstrates that the proposal generally far exceeds the ADG design criteria. The following summary demonstrates that the proposal greatly exceeds the ADG design criteria, which demonstrates the superior design and amenity outcomes of the proposal:

- 84% of living rooms and private open spaces receive 2 hours of sunlight between 9am and 3pm at mid winter (the ADG recommends a minimum of 70%)



- 11% of apartments receive no direct sunlight between 9am and 3pm at mid winter (the ADG recommends a maximum of 15%)
- 68.5% of apartments are naturally cross ventilated in the first 9 storeys of the building (the ADG recommends a minimum of 60%)
- 47% of the site is provided as communal open space, with an additional 722m<sup>2</sup> of communal open space provided at Level 6 (the ADG recommends a minimum of 25%)
- No more than 8 units are provided off a lift core, noting each lift core includes two lifts
- 21% of the site area is provided as deep soil area, significantly exceeding the minimum requirements under the ADG of 7%
- Building separation which exceeds the ADG recommendations as follows:
  - a minimum of 18m separation is proposed between the envelopes at Nos. 1 and 3 Skyline Place
  - minimum internal separation distances between buildings proposed under the Stage 1 works have been designed in accordance with the criteria under the ADG, with the smallest setback being between Buildings A and C of 12m. This setback is considered acceptable as it is at the point where Building C is the lowest (6 storeys).
  - a minimum setback of 9m is proposed to the northern, eastern and southern boundaries at No. 3 Skyline Place
  - a minimum setback of 9m is proposed to the southern and eastern boundaries at No. 1 Skyline Place
  - a minimum of 28m separation is proposed between the eastern and western buildings (Buildings A and B in Stage 1 and Buildings E and F at No. 1 Skyline Place) within the site (refer to Appendix 5 Architectural Plans)

## 6.2 Visual Impact Assessment

A Visual Impact Assessment (VIA) has been undertaken by Paddock Landscape Architects (Appendix 8), which assesses the changes in the visual landscape surrounding the development from key viewpoints surrounding the site resulting from both the concept proposal envelopes and the Stage 1 buildings.

The VIA notes the land uses surrounding the site are a mix of commercial and residential uses, with the Northern Beaches Hospital located along the same ridgeline as the proposal and with a maximum height of approximately 40m.

Large stands of existing native trees are located along the northern boundary of 1 Skyline Place with Frenchs Forest Road East, the southern boundary of 3 Skyline Place with Warringah Road and along the eastern boundaries of both sites along Skyline Place. Given this, the project sites are relatively screened by the existing native trees within direct proximity to the site.

As noted above, the site sits on a ridgeline which extends from Belrose and Forestville in the west to Dee Why in the east. In terms of views from the west and east, the site becomes visible only from the crest of the ridge which occurs approximately 600m to

the west along Frenchs Forest Road West (viewpoint 7) and approximately 800m to the east along Warringah Road (viewpoint 2).

In terms of views from the north and south, the west-east orientation of the ridgeline results in the project sites being visible from the north and south (particularly the taller structures within the development). It is noted that the Northern Beaches hospital is visible from distant viewpoints, such as the Sydney CBD 12.5km to the south, and as the tallest building proposed within 3 Skyline place is of similar height may also be viewed from the CBD (viewpoint 1).

The undulating topography and extensive Garigal National Park to the north and south, in addition to the low density residential areas, effectively limit views to the project sites from the north and south. The exception is the existing low density residential area of Frenchs Forest North (viewpoint 6 and 8).

The VIA selects 10 viewpoints that represent key views from both public and private spaces to the project sites. Specifically, the selected viewpoints include:

- streetscapes at ground level directly surrounding the site.
- streetscapes within the surrounding urban and suburban context.
- public spaces within the surrounding urban and suburban context.
- key transport infrastructure such as motorways and roadways.
- distant views from the Sydney CBD Sydney from privately managed spaces, such as residences, offices or observation areas.

The location of viewpoints is shown in Figure 17. It is noted that Viewpoint 1 is not shown on the below map as this was taken from the Shangri-La Blue in The Rocks to provide an understanding of the long range views of the site from the Sydney CBD.



Figure 17: Location of viewpoints assessed within VIA (Source: Paddock Landscape Architects)

The VIA uses the following weighting factors to determine the overall visual impacts:

- sensitivity to change - refers to the qualities of an area, the number and type of receptors or receivers (place, route, viewer audience or interest group which may receive an effect) and how sensitive the existing view is to the proposed change.
- magnitude to change - refers to the extent of change that will be experienced by receptors or receivers. This change may be adverse or beneficial. Factors that could be considered in assessing magnitude are: the proportion of the



view/landscape affected; how distant it is; extent of the area over which the change occurs; the size and scale of the change; the rate and duration of the change; and the level of contrast and compatibility.

- assessment - the combination of sensitivity and magnitude provides the rating of the visual impact for individual viewpoints and these are rated as high, moderate, low or negligible. The VIA includes photomontages which show the massing of the proposal from each viewpoint.

A summary of the findings of the VIA, including overall impact at each viewpoint is provided in Table 12.

Viewpoint	Location	Nature of receptor	Overall Impact Rating
1	Shangri-La Blu Bar on 36   Level 36, 176 Cumberland Street, The Rocks, Sydney.	Publicly accessible, privately managed space.	Low
2	Warringah Road (Jones Street) Frenchs Forest	Publicly accessible streetscape.	Moderate / Low
3	Warringah Road, Frenchs Forest	Publicly accessible streetscape.	Moderate / Low
4	Warringah Road (Hilmer Street), Frenchs Forest.	Publicly accessible streetscape.	Moderate / Low
5	Karingal Crescent, Frenchs Forest.	Publicly accessible streetscape within a low density residential area.	Moderate / Low
6	The Esplanade, Frenchs Forest.	Publicly accessible streetscape within a low density residential area.	Moderate
7	Frenchs Forest Road West (Gladys Avenue), Frenchs Forest.	Publicly accessible streetscape.	Moderate / Low
8	14 Bimbadeen Crescent, Frenchs Forest.	Publicly accessible streetscape within a low density residential area.	Moderate / Low
9	Frenchs Forest Road East (Hurdis Avenue), Frenchs Forest.	Publicly accessible streetscape.	Moderate / Low
10	7 Skyline Place, Frenchs Forest.	Publicly accessible streetscape within a high density residential area.	Moderate

Figure 18: Summary of visual impacts

It is noted that the visual impact from all viewpoints has been assessed as low to moderate and no high impacts have been identified. The photomontages generally show that the proposed buildings are screened by existing built form or only the upper levels of the building can be shown. Examples of where the visual impact of the proposal have been assessed as moderate are Viewpoint 6 and Viewpoint 10 which are shown in the figures below.

#### **Viewpoint 6: The Esplanade, Frenchs Forest**



Figure 19: indicative view before and after proposed development looking south east from The Esplanade, Frenchs Forest (Source, Keylan)

#### Viewpoint 10: 5 Skyline Place, Frenchs Forest

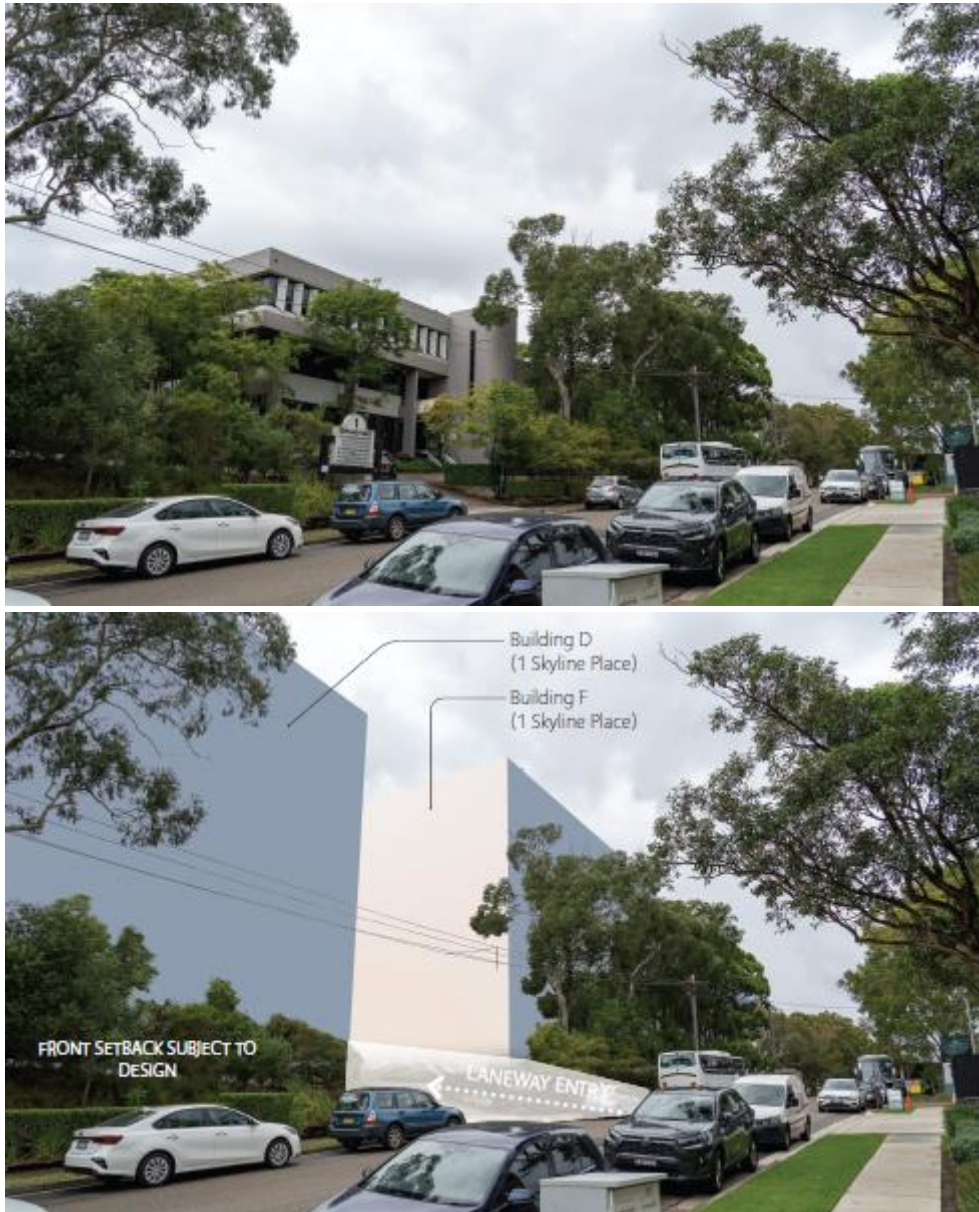


Figure 20: Indicative view before and after proposed development looking east from 5 Skyline Place  
(Source: Keylan)

The above viewpoints, which represent the most significant change to the visual catchment as assessed by the VIA, are a result of both proximity and topography. Notwithstanding, despite having the most significant visual impact at these points, they have still been assessed as a 'moderate' visual impact.

In terms of representative visual impacts from viewpoints in the immediate vicinity of the site, viewpoints 3, 8 and 9 have all been assessed as moderate/low, as shown in the figures below:



### Viewpoint 3: Warringah Road, Frenchs Forest



Figure 21: Indicative view before and after proposed development looking west from Warringah Road  
(Source: Paddock)

**Viewpoint 8: Bimbadeen Crescent, Frenchs Forest**



Figure 22: Indicative view before and after proposed development looking south from Bimbadeen Crescent  
(Source: Paddock)



Viewpoint 9: Frenchs Forest Road East at Hurdis Avenue, Frenchs Forest



Figure 23: Indicative view before and after proposed development looking west from Frenchs Forest Road East at Hurdis Avenue (Source: Paddock)

Accordingly, the VIA concludes that:

- The impact of the proposed development from the east would be low to moderate given the views are contained due to the location of the project sites along the ridgeline. Impact to views would primarily be from roadways (such as Warringah Road) and surrounding low density residential areas located along the ridgeline to the north.
- The impact of the proposed development from the west would be low to moderate given the views are contained due to the location of the project sites

along the ridgeline. Impact to views would primarily be from roadways (such as Frenchs Forest Road and Warringah Road) and surrounding low density residential areas located along the ridgeline to the north and south.

- The impact of the proposed development from the south would be low given the topography grading away from the ridgeline and the limited residential areas located within proximity to the project sites to the south. The impact of distant views from the south, such as the Sydney CBD or other taller urban centres, would be low. The Northern Beaches Hospital is along the ridgeline west of the project sites and is approximately 40m in height. This area is anticipated to undergo significant continuing built form transition over coming years with the development of the Frenchs Forest town centre development over the coming years as the new town centre is developed.
- The impact of the proposed development from the north would be moderate given the close proximity of existing low density residential areas, such as within Frenchs Forest North. The impact to views from the north would be contained to these areas due to the topography grading away from the ridgeline, the extensive Garigal National Park and the limited residential areas located further to the north.

In addition, the VIA includes a number of mitigation measures which have been incorporated into the proposal, including:

- retention of existing trees and vegetation to the perimeter of the sites to screen the proposed development and provide filtered views to the site
- locating shorter massing envelopes and proposed buildings to the perimeter of the project sites so that they are appropriately screened and to the scale of the height of the canopies of existing vegetation to be retained
- locating taller massing envelopes and proposed buildings within the centre of the project sites to reduce the scale when viewed from surrounding streetscapes and urban areas
- locating the taller tower form of Building C of 3 Skyline Place along the southern boundary interface with Warringah Road where there is minimal residential areas to the south
- articulation of the built form so that it provides contrast and interest to the facade, particularly along street frontages and within the central courtyard spaces
- locating employment generating uses, such as cafes, active uses etc, within ground floor areas along the streetscape or adjacent to public domain areas within the central courtyards.
- supplementary canopy native tree plantings along site boundaries and within central courtyard spaces.
- selection of appropriate building materials and finishes

Accordingly, it is concluded that the proposed development will have minimal visual impact. The siting and design of the proposed buildings, including selected materials for No. 3 Skyline and building articulation alongside a dense landscaping scheme, ensures that the proposal appropriately fits within the existing context of the site.

## 6.3 Landscaping and Open Space

Landscape Plans have been prepared by Paddock Landscape Architects and are included at Appendix 14. The objectives of the proposed landscaping scheme are to ensure the proposal contributes to the bushland character of the surrounding area, providing functional and high quality open space areas, providing planting and open space with an appropriate scale, and retaining any significant trees onsite. Broadly, the landscape scheme incorporates mulching, sandstone walls, paving, turf, canopy trees, deciduous trees, seating and the retention of existing trees onsite.

An extract of the proposed landscaping site plan is provided in the figure below.

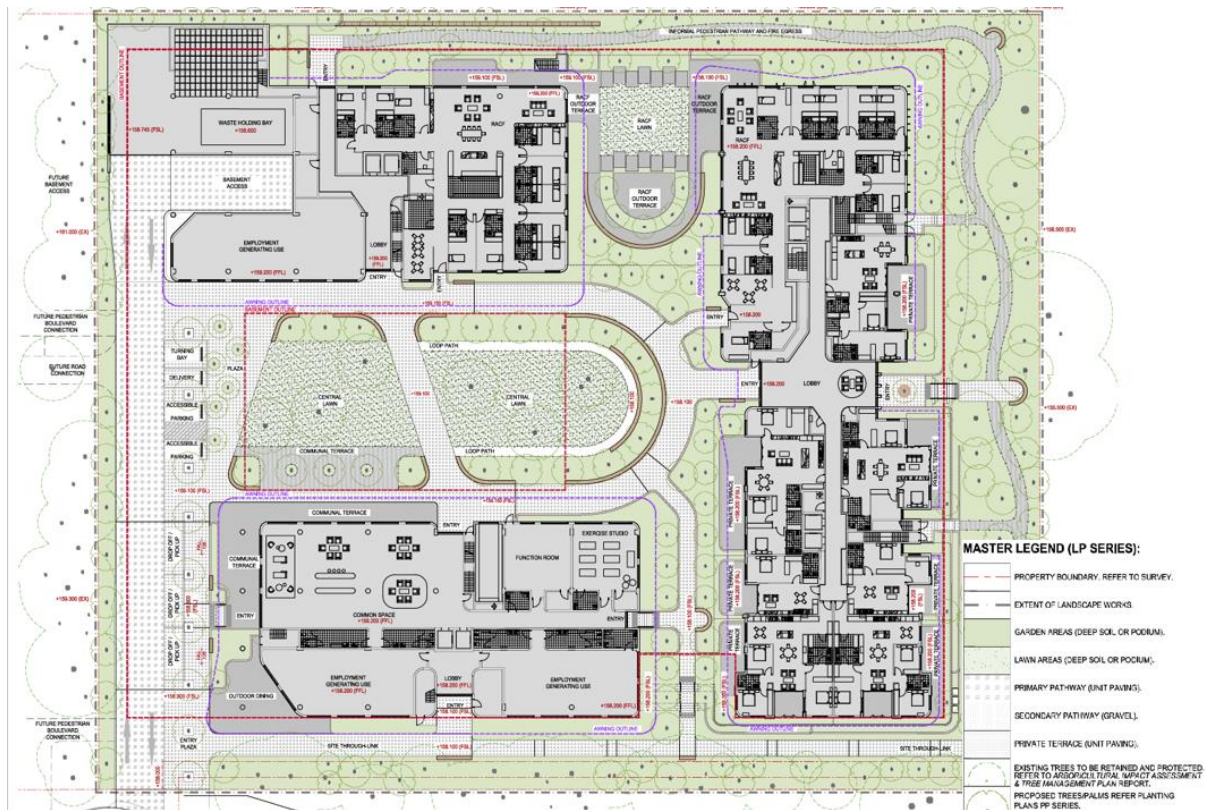


Figure 24 Landscape Plan (Source: Paddock Landscape Architects)

Under the proposed Stage 1 works, a provision has been made for 3,964m<sup>2</sup> of the site area as landscaped area. This amount exceeds the minimum required landscaped area of 33% of the total site area as set out in the DCP (3,809.5m<sup>2</sup>). The proposed landscaped areas intend to maximise future residential amenity and ensure the proposed development respects the existing nature of the surrounding area. This is further reinforced by the selection of plant species which reflect the landscaped character of Frenchs Forest including environmentally and culturally important species that reflect the surrounding areas wetlands, grasslands, heathlands, scrub and forests that has been informed by the Connecting with Country process and report at Appendix 31. Examples of proposed buffer plantings are provided below.





Figure 25: Proposed landscape buffer plants (Source: Paddock Landscape Architects)

Extensive landscaping is proposed to the centralised open space area to provide a publicly accessible courtyard. The courtyard creates an inclusive space for passive recreation that will also include community gardens for resident use and a children's play area and open turf area to encourage family and friends to visit. The pathways provided throughout the piazza area add to the walkability of the development, including ramps so that the area is accessible to all.



Figure 26: Photomontage of future centralised open space courtyard (Source: PA Studio)

The function of the courtyard is to act as a central meeting place which ensures cohesion between the future development at No. 1 Skyline Place and the approved development at adjoining sites to the west.



## 6.4 Economic

### 6.4.1 Economic Impact

An Economic Impact Assessment (EIA) has been prepared by Hadron Group and provided at Appendix 6. The EIA demonstrates that the proposal will support the transition of Frenchs Forest business park into an innovation precinct, consistent with the vision for the Frenchs Forest strategic centre outlined in the *Greater Sydney Region Plan* and *North District Plan*.

The proposed development is expected to generate a number of economic benefits for the locality and for the Northern Beaches LGA, including new employment opportunities, new opportunities for residential and commercial development that will support the operation of the Northern Beaches Hospital and expanded levels of household expenditure on a wide range of retail and other services. Specifically, the proposal is justified from an economic perspective as:

- **it aligns with state-wide planning strategies** - the site utilises the provisions of the Housing SEPP to achieve the objectives of the SEPP by delivering diverse seniors housing, including ILUs, a RCF, and affordable rental ILUs. It also aligns with planning for the Frenchs Forest Precinct by providing commercial uses which will complement the Health and Education precinct;
- **it provides for both social and economic benefits through a modern alternative to the typical retirement village arrangement** - the proposed arrangement of the ILUs allows for financial independence and flexible access to support services within the site. Additionally, the development is sited within a locality identified for health and education uses and the nearby future Frenchs Forest Town Centre to service the future seniors population at the site;
- **it aligns with the objectives of the SP4 Enterprise zone in which it is located** - the proposal will enhance the functionality and appeal of the Business Park through diversifying the uses whilst minimising land use conflict through careful site planning including orienting commercial spaces toward other commercial/industrial buildings and uses.
- **it aligns with the demonstrated demand for commercial floorspace in the area** - given the significant planned commercial floorspace within the nearby future Frenchs Forest Town Centre, the proposed employment generating floorspace is appropriate for the site as it provides a viable floor area to provide uses that would service future residents within the site.
- **it reflects the evolving role of Business Parks within Greater Sydney** - the northern portion of the Business Park's proximity to the hospital makes it better suited for diversified uses including healthcare, medical technology, and related logistics services. Introducing 24-hour operations (such as high-tech, advanced manufacturing, and last mile logistics) in this part of the Business Park contradicts the objectives of the SP4 zone to minimise land use conflicts and protect residential amenity, particularly given the existing residential context and the Frenchs Forest 2041 Place Strategy's plans to intensify these uses.

Furthermore, the development is predicted to generate 465 direct and 1,253 indirect job-years during construction and 72 jobs during operation. While this is lower than the

theoretical employment capacity of the site if the existing office and warehouse space were fully occupied, it enables development that supports state housing strategies by expanding the supply of diverse seniors housing. It also provides opportunities for higher order job types and the potential to enhance the broader economic value of the Frenchs Forest business park by improving amenity and providing small, modern, flexible workspaces – addressing factors identified in The Northern Beaches Employment Study as contributing to the business park’s underperformance.

The EIA identifies that Council has acknowledged that industries or businesses with 24-hour operations should be located in the southern portion of the Business Park, south of Warringah Road, to minimise impacts on low density residential areas to the north of Frenchs Forest Road. It is further noted that the northern portion of the Business Park is better suited to uses that would support the function of the Health and Education Precinct, including high-tech industries, which would reduce any potential for land use conflict with the proposed seniors development or surrounding low density residential areas.

## 6.5 Traffic and transport

A Transport and Accessibility Impact Assessment (TAIA) has been prepared by Varga Traffic Planning to assess the traffic and parking implications for the proposed development (Appendix 12). The TAIA has been prepared in accordance with Transport for NSW's *Guide to Transport Impact Assessment*.

In summary, the TAIA concludes that the proposal is deemed supportable on traffic and transport planning grounds and will not result in any adverse impacts on the surrounding road network. A further assessment is provided in the subsections below.

### 6.5.1 Existing and future road network

The road network surrounding the site includes a mix of state, regional and local roads. The key road connections in proximity to the site are described within the table below and shown in Figure 27.

Road name	TfNSW classification	On-street parking opportunities	Traffic lane
Warringah Road	State Road	No	3 traffic lanes in each direction in the vicinity of the site
Wakehurst Parkway	State Road	No	1-2 traffic lanes in each direction in the vicinity of the site
Allambie Road / Kentwell Road	Regional Road	No, not in vicinity of the site	1 traffic lane in each direction
Frenchs Forest Road	Local Road (unclassified)	No	2 traffic lanes in each direction
Skyline Place	Local Road (unclassified)	Yes	1 traffic lane in each direction

Table 16: Summary of surrounding road network

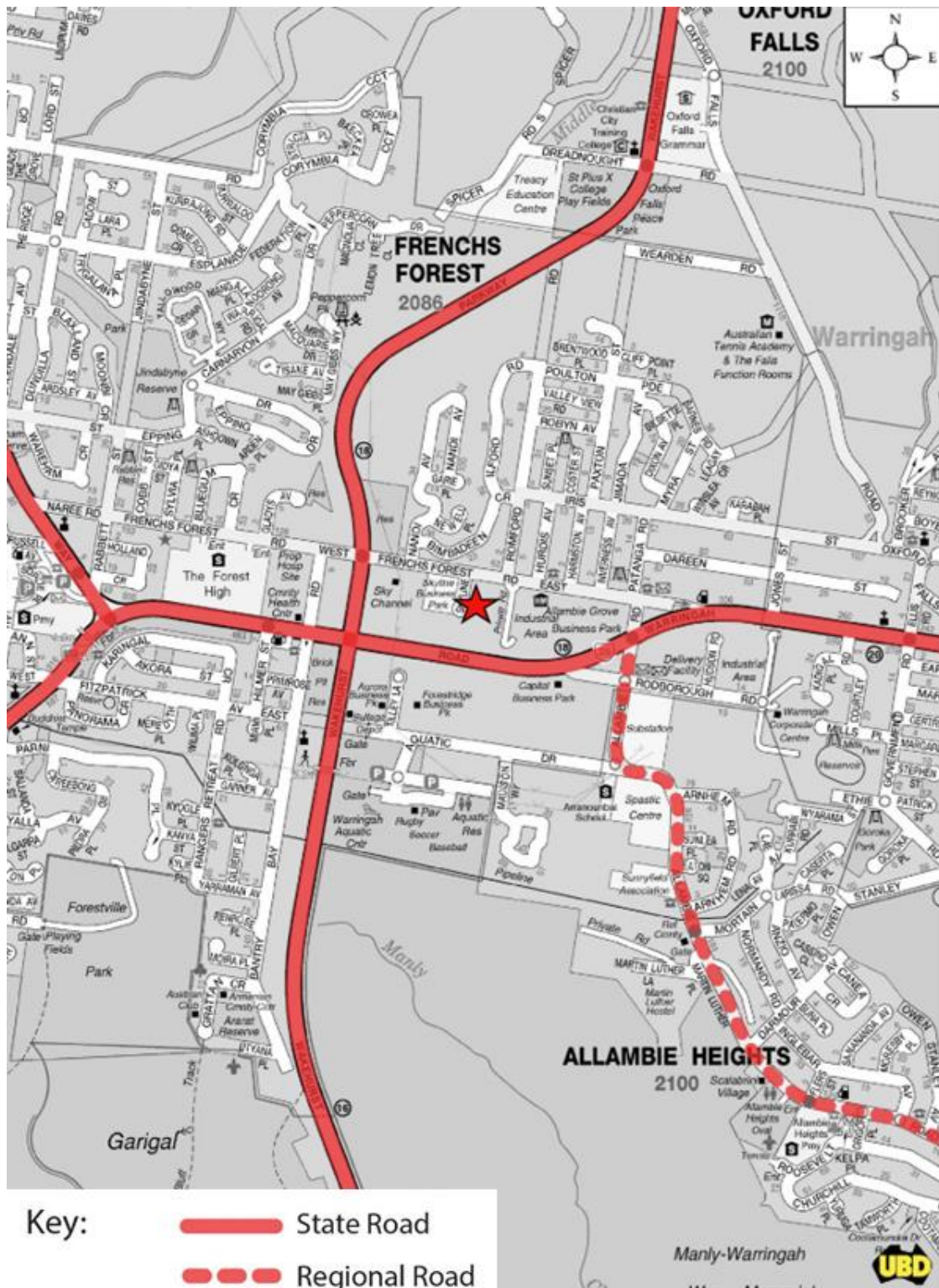


Figure 27: Surrounding road network (Source: Varga Traffic Planning)

## 6.5.2 Traffic generation

The anticipated traffic generation for the development has been calculated based on the existing traffic generation and TfNSW's Guide to Traffic Impact Assessment.

The estimated traffic generation is provided in the table below. This also accounts for the recent approval at No. 5 Skyline Place to provide a better understanding of the cumulative traffic generation.

Site	Use and provision	Projected traffic generation	
		AM	PM
1 Skyline Place (Concept Proposal)	Seniors living (approx. 160 units)	14.4vph	27.2vph
	Commercial uses (1,200m <sup>2</sup> )	20.3vph	14.4vph
	<b>Subtotal</b>	<b>34.7vph</b>	<b>41.6vph</b>
3 Skyline Place (Concept Proposal and Stage 1 works)	Seniors living (200 units)	18vph	34vph
	RCF (20 beds)	1.8vph	3.4vph
	Commercial (546m <sup>2</sup> )	9.2vph	6.6vph
	<b>Subtotal</b>	<b>29vph</b>	<b>44vph</b>
5 Skyline Place (approved under REV2021/0212 and modified by MOD2023/0617)	Seniors living (104 units)	9.4vph	17.7vph
	Commercial (448m <sup>2</sup> )	7.6vph	5.4vph
	Childcare (69 children)	44.2vph	26.9vph
	<b>Subtotal</b>	<b>61.2vph</b>	<b>50vph</b>
<b>GRAND TOTAL</b>		<b>124.9vph</b>	<b>135.6vph</b>

Table 17: Estimated cumulative traffic generation of concept proposal and approval at 5 Skyline Place

The TIA states that projected traffic generation should be offset by the volume of traffic which could be expected to be generated by the existing development at the site, that is for commercial purposes, in order to determine the nett increase or decrease in traffic generation potential of the site as a result of the proposal when compared with the approved development on the site.

Based on the existing commercial uses, and that currently approved at No. 5 Skyline Place, the existing traffic generation of the site is 175.6 vehicle per hour trips in the morning and 153 vehicles per hour trips in the afternoon. Accordingly, the proposal results in a nett decrease of hourly vehicle trips by 51 trips per hour in the morning and 17.4 trips per hour in the afternoon. This therefore results in a reduced impact on the existing surrounding road network in terms of traffic generation.

### 6.5.3 Parking

The applicable parking provisions for the proposed development are contained under Sections 107 and 108 of the Housing SEPP which provide non-discretionary standards for car parking.

In summary, the proposal is required to provide 0.5 parking spaces for each bedroom within the ILU component of the development and at least 1 parking space for every 15 beds in the RCF along with 1 space for every 2 employees on duty and a space for ambulance parking. For the purposes of the employment generating uses, the prescribed car parking rates for office uses under the Warringah DCP 2011 has been adopted.

A summary of the required car parking and that provided is included in the table below.

Use	Required parking spaces	Provided
Housing SEPP provisions		
ILUs (200 ILUs providing 509 bedrooms)	254.5	283
Seniors visitors	N/A - not prescribed	22
RCF residents	1.3	5
RCF staff	1	
Warringah DCP provisions		
Office uses	13.7	14
Car wash bays	N/A	2
<b>Total</b>	270.5	326

The above car parking spaces are provided for across three basement levels as shown in the accompanying Architectural Plans at Appendix 5. An appropriate provision has been made for accessible parking spaces of 5% of the total car parking spaces in accordance with AS/NZS 2890.6:2009 (*Off-street parking for people with disabilities*). The proposal also makes provision for a 12-seater bus space to services the RCF and two additional accessible parking spaces at ground level, adjacent to a delivery bay and turning bay.

### 6.5.4 Access arrangements

Vehicular access to the site is provided via the existing crossover for No. 3 Skyline Place which will provide for access and egress to the site. Once the site is accessed, vehicles will utilise the private driveway along the northern boundary of No. 3 to access the basement car park.

No vehicular access is provided off Warringah Road given its classified nature.

### 6.5.5 Construction Traffic Management

A Construction Traffic Management Plan (CTMP) has been prepared by Varga Traffic Planning and is provided at Appendix 32.



The CTMP estimates that following approval of the Stage 1 works, construction activities are expected to be undertaken over a duration of approximately 28 months as set out below:

<b>CONSTRUCTION PROGRAM – APPROXIMATE DURATIONS</b>		
<b>Stage</b>	<b>Work</b>	<b>Duration</b>
1	Demolition	2 months
2	Excavation	5 months
3	Construction	21 months

Figure 28: Estimated construction duration (Source: Varga Traffic Planning)

### 6.5.6 Green Travel Plan

A Green Travel Plan (GTP) has been prepared by Varga Traffic Planning and is provided at Appendix 33.

The GTP provides detail on transport options for future residents and employees in relation to accessing the site. This includes identifying the extensive range of bus services which are provided along Frenchs Forest Road within 200m of the site. These services include:

- *a number of express bus services to Chatswood, Central Sydney CBD, and other employment centres*
- *regular local bus services which connect to Northern Beaches Hospital, Skyline Shops, Forestway Shopping Centre, and Warringah Mall*
- *multiple bus services to Manly, Dee Why, Warringah, and Manly*

The above services demonstrate the site's high accessibility and ensure future residents and employees do not have to rely on car transport for access to the site.

## 6.6 Noise and vibration

A Noise and Vibration Impact Assessment (NVIA) was carried out by Acoustic Logic and is included at Appendix 14. The assessment assesses the potential construction and operational noise, as well as vibration impacts, associated with the proposal.

### 6.6.1 Existing Noise Environment

As shown within the figure below, the nearest receivers are both residential and commercial developments to the north, east, south and west of the site (identified in green and red shading respectively). The nearest residential receivers are approximately 20m north of No. 1 Skyline Place, or 130m north of No. 3 Skyline Place which is subject to the proposed Stage 1 works.





Figure 29: Surrounding receivers mapping including location of noise loggers (Acoustic Logic)

Long term unattended noise monitoring has been continuously undertaken at 5 Skyline Place to the west of the site with supplementary measurements taken to validate these measurements in December 2024. The measured noise levels have been used to determine the existing noise environment and to set the criteria used to assess the potential impacts from the proposal.

An extract from the NVIA which summarises the traffic noise monitoring results is provided below.

Monitor Location	Traffic Noise Level dB(A) $L_{eq,1\text{-hour}}$	
	Daytime (7am-10pm)	Night (10pm-7am)
M1 Warringah Road	72 $L_{eq(15\text{-hr})}$	67 $L_{eq(9\text{-hr})}$
M2 Frenchs Forest Road East	62 dB(A) $L_{eq(1\text{-hr})}$	55 dB(A) $L_{eq(1\text{-hr})}$
A1 Warringah Road in line with proposed building façade @4.5m above ground	67 dB(A) $L_{eq(15\text{-min})}$	-
A2 Frenchs Forest Road East @4m from kerb	68 dB(A) $L_{eq(15\text{-min})}$	

Figure 30: Summary of existing background traffic noise levels (Source: Acoustic Logic)

The attended measurements were generally found to be consistent with the results of the unattended noise monitoring and show that existing ambient noise levels are typically dominated by road traffic noise from Warringah Road and Frenchs Forest Road.

### 6.6.2 Construction Noise and Vibration

Construction works hours will be undertaken in accordance with the *NSW Interim Construction Noise Guideline* (ICNG) as outlined below:

- 7am to 6pm Monday to Friday;
- 8am to 1pm on Saturdays; and
- no work on Sundays or Public Holidays.

To mitigate impacts on surrounding receivers during the construction phase, the following noise management levels are to be adhered to as outlined in the NVIA:

Noise Receiver Location	Management Level dB(A) $L_{eq}$ (15 min)
Surrounding Residential Receivers	"Noise Affected" Level - 60 "Highly Noise Affected" Level – 75
Surrounding Commercial Receivers	70
Surrounding Industrial Receivers	75

Figure 31: Summary of noise management levels during construction (Source: Acoustic Logic)

The above noise management levels are included as part of the Mitigation Measures table at Appendix 2. Similarly, the proposal recommends maximum vibration limits for surrounding receivers as follows:

Vibration Receiver	Recommended Vibration Limits PPV (mm/s)
Residential Buildings	5
Industrial Buildings	20

Figure 32: Recommended vibration levels (Source: Acoustic Logic)

The above are to be adhered to and will also be included as a mitigation measure.

In addition to the above measures, a Construction Noise and Vibration Management Plan (CNVMP) is to be prepared before any work begins. This would identify all potentially impacted receivers, assess the potential noise and vibration impacts from the project and provide details regarding how the impacts would be minimised through the use of all feasible and reasonable mitigation measures. The CNVMP would also contain procedures for handling complaints, should they occur, and detail any compliance monitoring requirements.

### 6.6.3 Operational Noise

Given the nature of the proposal, potential noise emissions are likely to be associated with mechanical plant and equipment servicing the development. An assessment has

therefore been undertaken in accordance with the NSW EPA Noise Policy for Industry (NPfI) to determine the impact the operation of the development has on surrounding receivers.

The anticipated amenity noise levels have been calculated and compared against the recommended noise levels. This is summarised by the NVIA and presented below.

Type of Receiver	Time of Day*	Recommended Noise Level dB(A) <sub>Leq(period)</sub>	Amenity Noise Level dB(A) <sub>Leq(period)</sub>
Residential – Suburban	Day (7am – 6pm)	55	53
	Evening (6pm – 10pm)	45	43
	Night (10pm – 7am)	40	38
Commercial	When in use	65	63
Industrial	When in use	70	68

Figure 33: Summary of recommended operational levels against calculated amenity noise levels (Source: Acoustic Logic)

As demonstrated in the above, the proposal complies with the recommended noise levels for all surrounding receivers. In particular, the proposed development ensures compliance with recommended noise levels at all times of day for residential receivers.

Further, the NVIA assesses the proposed development against the requirements of Section 2.120 of the Transport and Infrastructure SEPP which specifies:

*(1) This section applies to development for any of the following purposes that is on land in or adjacent to the road corridor for a freeway, a tollway or a transitway or any other road with an annual average daily traffic volume of more than 20,000 vehicles (based on the traffic volume data published on the website of TfNSW) and that the consent authority considers is likely to be adversely affected by road noise or vibration—*

*(a) residential accommodation,*

...

*(3) If the development is for the purposes of residential accommodation, the consent authority must not grant consent to the development unless it is satisfied that appropriate measures will be taken to ensure that the following LAeq levels are not exceeded—*

*(a) in any bedroom in the residential accommodation—35 dB(A) at any time between 10 pm and 7 am,*

*(b) anywhere else in the residential accommodation (other than a garage, kitchen, bathroom or hallway)—40 dB(A) at any time.*

An assessment utilising existing background levels has demonstrated the proposal results in a minor non-compliance with the above requirements of subsection 3, as summarised in the table below (with relevant noise emission criteria **bolded**).

Receiver	Period	Assessment Background Noise Level dB (A) L90	Project Amenity Noise Level dB(a) Leq(15min)	Intrusiveness Noise Level Leq(15min)	NPfl Sleep Disturbance Noise Level
Residential	Day	50	<b>53</b>	55	N/A
	Evening	44	<b>43</b>	49	N/A
	Night	33	<b>38</b>	<b>38</b>	40 dB(A)Leq. 15min, 52 dB(A)LFmax

Table 18: External noise emission criteria and results (Source: Acoustic Logic)

To mitigate the relevant noise impacts to ensure compliance with the criteria prescribed under Section 2.120 of the Transport and Infrastructure SEPP, the following mitigation measures are recommended to be implemented in the construction of the development:

- External wall construction - masonry or concrete wall structures will be acceptable without any further acoustic treatment required.
- External roof/ceiling construction - masonry or concrete roof structures will be acceptable without any further acoustic treatment required.
- Glazed windows and doors - aluminium framed/sliding glass doors and windows will be satisfactory provided they are fitted with Q-Lon type acoustic seals. Thicker glazing may be required but will be determined at the detailed design phase.

The above measures are referenced as part of the Mitigation Measures in Appendix 2.

## 6.7 Social Impact

A Social Impact Assessment (SIA) has been prepared by Hadron Group and is provided at Appendix 30. The SIA has been prepared in accordance with the DPHI's Social Impact Assessment Guidelines for State Significant Projects (February 2023).

The assessment considers the potential impacts to people's way of life, community, accessibility, culture, health and wellbeing, surroundings, livelihoods, and the extent to which people have had a say in the decision-making process for the project.

The SIA considers the following key social impacts associated with the proposal are:

- *Way of life, access, health and wellbeing impacts from providing Independent Living Units (ILUs) in close proximity to the Frenchs Forest Hospital Precinct, which includes the new hospital, future town centre and a wide range of supporting health services.*
- *Way of life, health and wellbeing impacts in respect of the provision of a modern Residential Aged Care (RAC) facility that will provide opportunities for seniors at 1,3, 5 and 7 Skyline Place to age in place and receive the appropriate level of care without having to relocate.*

- *Community and accessibility impacts through the creation of open spaces that facilitate social interactions among residents, their families, and the local community and the provision of onsite amenities to support the social and recreational needs of residents.*
- *Way of life, health and wellbeing, community and accessibility impacts in respect of noise and vibration, dust and traffic related to construction and potential cumulative impacts resulting from future development activity at the adjacent the health and education precinct.*
- *Livelihood impacts from the change in composition of the workforce post-completion as a result in a shift of use from office and warehousing to aged care, building support and some small non-residential uses.*

It is considered that the above social impacts are generally positive, with the exception of identified construction related impacts including noise, vibration, dust and traffic and potential cumulative impacts resulting from development activity in the nearby Frenchs Forest Town Centre and the broader health and education precinct.

In relation to the above that can be controlled, any construction related impacts will be short terms and will be appropriately managed through the Construction Traffic Management Plan (CTMP) as provided at Appendix 12 and through the preparation of a Construction Noise and Vibration Management Plan as included within the Mitigation Measures at Appendix 2.

Overall, the proposal will have net positive social impacts and will appropriately manage and potential negative impacts to future residents and the surrounding locality.

## **6.8 Ground and water**

To address ground and water matters, this EIS is accompanied by the following technical reports:

- Geotechnical Assessment provided at Appendix 28
- Surface Water and Groundwater Impact Assessment provided at Appendix 39
- Salinity Conditions Report at Appendix 15
- Acid Sulphate Soils Conditions Report at Appendix 26

A discussion in relation to ground and water conditions, with respect to the above technical inputs, is provided in the sections below.

### **6.8.1 Geotechnical**

A Geotechnical Assessment has been prepared by Aargus Group and is provided at Appendix 28. The desktop study investigates regional geology and sub-surface conditions, including groundwater.

The Geotechnical Assessment reviews the inferred groundwater level based on a review of the 'Natural Resources Atlas' database made available by the NSW Department of Natural Resources. A review of the database has indicated that groundwater levels will be at approximately 2.5 - 4.0m depth and in the form of seepage through defects in weathered bedrock, or at the soil-rock contact. The



assessment further recommends six to seven boreholes are drilled on each site to gauge an understanding of both geological and geotechnical conditions at the site.

Further, given the excavation required, A CNVMP will be prepared. This has been recommended in the NVIA, discussed above, and included as part of the Mitigation Measures at Appendix 2.

### 6.8.2 Surface Water and Groundwater

A Surface Water and Groundwater Impact Assessment (SWGIA) prepared by Aargus Group is provided at Appendix 39. The SWGIA assesses the existing conditions at the site and relevant construction impacts and how this can be mitigated.

The SWGIA did not identify any atypical of the existing surface water and groundwater conditions at the site. Notwithstanding, it identified potential impacts to surface water during construction. These impacts are a result of:

- vehicle movement across construction site areas may loosen soils and transport sediment onto public roads and into the waterways resulting in reduced visual amenity from turbid water and visible gross pollutants;
- spills from machinery or equipment during refuelling or accidental spill resulting in oil sheen on water surface;
- concrete washout water being discharged into waterways resulting in increased turbidity which could impact ecosystems, visual amenity and recreation;
- construction within areas of moderate saline soils may expose saline soils resulting in saline runoff impacting ecosystems and making water unsuitable for irrigation and livestock; and
- poorly treated discharge may result in impacts to ambient water quality resulting in increases to alkalinity and toxicant concentration impacting ecosystems.

In addition to surface water, construction activities may potentially impact groundwater as follows:

- *potential changes to groundwater levels and flow directions;*
- *potential changes to baseflow volumes;*
- *potential impacts to bores; and*
- *potential changes to groundwater quality, whereby changes to groundwater quality during the construction period could occur as follows:*
  - *Groundwater systems could become contaminated if accidental spills or leaks of hazardous materials (such as fuels, lubricants and hydraulic oils) occur during construction or operation.*
  - *If potential acid sulphate soils are excavated and oxidised or if actual acid sulphate soils are excavated and mobilised, some acidification could occur. Acidification could also occur due to oxidation as a result of lowered groundwater levels. The acidification could also potentially mobilise heavy metals.*
  - *Groundwater salinity could be increased if groundwater levels increase, and salts are mobilised that have natural accumulated in the soil. This risk*



*of the above occurring is considered low if provided management measures are employed.*

- *Small and localised changes to groundwater levels including the proposed bulk earth works.*

Notwithstanding the above impacts to surface and groundwater, the SWGIA confirms that the implementation of a Construction Environmental Management Plan (CEMP) would effectively manage impacts to surface water and groundwater. It is noted that a Construction Management Plan has been provided at Appendix 34 which addresses erosion and sediment control to minimise impact to surface and groundwater.

The SWGIA also provides a list of mitigation measures to minimise any impacts during both construction and operation, provided in the table below.

Phase	Mitigation method
Construction	<ul style="list-style-type: none"> <li>• <i>Prepare a soil and water management plan and incorporate in the CEMP.</i></li> <li>• <i>Install sediment and erosion control measures in accordance with the Blue Book (DECC, 2008).</i></li> <li>• <i>Prepare water quality monitoring plan and incorporate in the CEMP</i></li> <li>• <i>Storage of hazardous goods and refuelling activities to take place in bunded areas.</i></li> <li>• <i>Implement water quality monitoring program.</i></li> <li>• <i>Minimise excavations below groundwater table.</i></li> <li>• <i>Minimise duration of time that excavations below the water table are open.</i></li> </ul>
Operation	<ul style="list-style-type: none"> <li>• <i>Increase in potential for pollutant generation.</i></li> <li>• <i>Where practical and space allows, adopt WSUD guidelines for drainage infrastructure (appropriate plant species selection, etc). Adopt adequate erosion and scour protection measures in the drainage design.</i></li> <li>• <i>Install impermeable liners or redesign to shallower depth stormwater basins where they may intercept groundwater.</i></li> </ul>

Table 19: Surface water and groundwater impact mitigation methods

The above methods have also been included as part of the proposal's Mitigation Measures included at Appendix 2.

### 6.8.3 Acid Sulphate Soils

The Acid Sulphates Conditions Report (ASC Report) prepared by Aargus Group and provided at Appendix 26 demonstrates that the site is not affected by acid sulphate soils. An extract from the NSW Planning Portal is provided below which shows the site is not identified on the Acid Sulfate Soils Map.

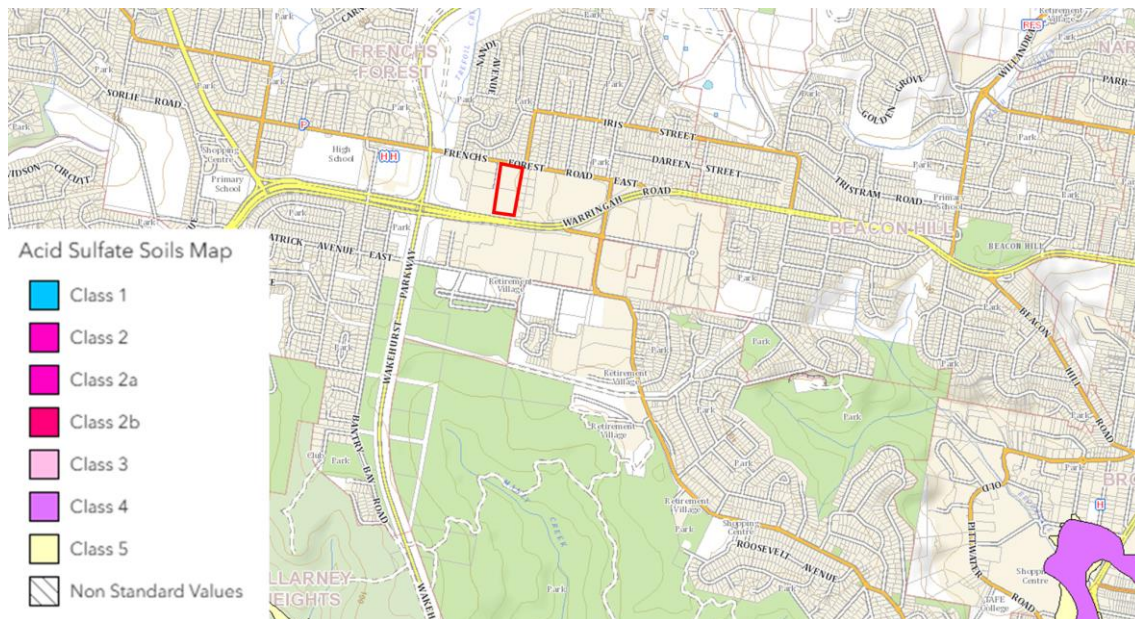


Figure 34: Acid Sulfate Soils Map with site outlined red (Source: NSW Planning Portal)

The ASC Report concludes that there is a "low probability" of acid sulphate soils at the site and the presence of acid sulphate soils was considered to be unlikely.

#### 6.8.4 Stormwater management

An Integrated Water Management Plan has been prepared by Enscape Studio and is provided at Appendix 16. The proposed development will utilise a variety of drainage methods to ensure stormwater is appropriately drained from the site. The proposed drainage strategy includes:

- in-ground drainage which will allow surface runoff from the development to be directed into the proposed stormwater inlet structures and then through a pit and pipe system;
- provision of separate legal points of discharge for each site, whereby No. 1 Skyline PI will discharge to Skyline Place whilst No. 3 Skyline PI will discharge to Warringah Road;
- provision of an on site detention (OSD) system, including an OSD tank located below Building C in the south-western corner of the site; and
- provision of a stormwater quality system at No. 3 in the form of inlet traps, stormfilter cartridges and rainwater tanks.

The above stormwater drainage management strategies are to be implemented to ensure the appropriate drainage and treatment of stormwater within the site. The above is included as part of the Mitigation Measures at Appendix 2.

## 6.9 Flooding

An Integrated Water Management Plan has been prepared and is included at Appendix 16. This report includes a Flood Impact Assessment (FIA), that includes Council's flood hazard mapping which demonstrates that the site is not subject to flooding. The FIA

notes that the site may experience local flooding due to insufficient drainage infrastructure, however, the proposed stormwater drainage for 3 Skyline Place will sufficiently drain water from the site.

An extract of Council's flood hazard map is provided below:

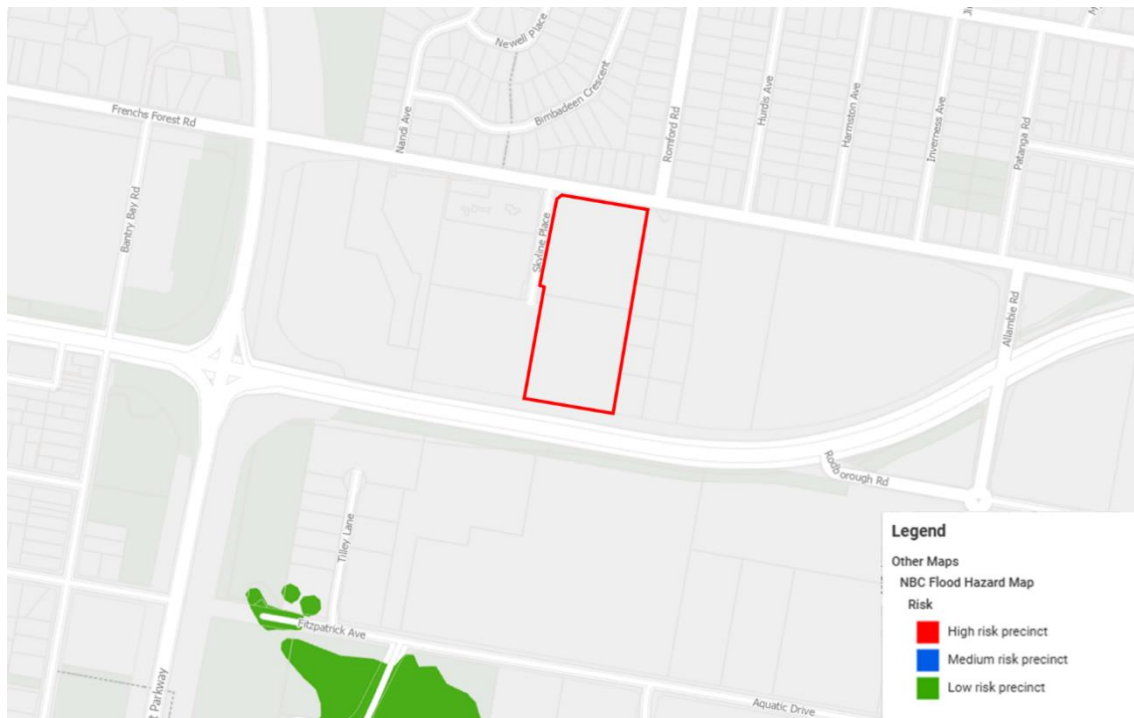


Figure 35: Flood Hazard Map (Source: Northern Beaches Council)

## 6.10 Contamination and remediation

A Preliminary Site Investigation (PSI) has been prepared by Aargus and is provided at Appendix 18. The scope of the PSI is as follows:

- *Review of the physical site setting and site conditions based on a site inspection, including research of the location of sewers, drains, holding tanks and pits, spills, patches of discoloured vegetation, etc. (where applicable);*
- *Research and review of the information available, including current and historical titles information, review of aerial photographs, groundwater bore searches, EPA notices, council records, SafeWork NSW records, site survey and site records on waste management practices;*
- *Development of a preliminary Conceptual Site Model (CSM) to demonstrate the interactions between potential sources of contamination, exposure pathways and human/ecological receptors identified; and*
- *Recommendations for additional investigations should any data gaps be identified or possible strategies for the management of the site, where relevant.*

The PSI identifies areas of potential environmental concern within the site as a result of potential importation of uncontrolled fill, pesticide uses, vehicle parking, metal degradation, chemical storage, leaks from substation, current & former site activities, onsite migration, and current & former asbestos based building products.

Any contaminants that may be present within the site were considered to be of low significance. However, it has been recommended that a Detailed Site Investigation (DSI) be required as a condition of consent.

The site can therefore be made suitable for the proposed development subject to the completion of a DSI. This can be imposed as a condition of consent and is included in the Mitigation Measures at Appendix 2.

## 6.11 Biodiversity

In accordance with the Biodiversity Conservation Act 2016, a Biodiversity Development Assessment Report (BDAR) has been prepared by Ecologique and is provided at Appendix 13.

No. 1 Skyline Place, which forms part of the concept proposal, is identified as hosting biodiversity values land along the northern boundary of the site. The extent of the biodiversity values land within the boundaries of No. 1 Skyline Place is shown in the figure below.

It is further noted that Figure 36 shows the actual extent of the plant community type, Sydney Coastal Sandstone Bloodwood Shrub Forest (PCT 3593), along the northern boundary. The BDAR flags that this particular PCT 3593 is not a diagnostic species and is not expected to occur in the locality.

The BDAR provides for a threatened species assessment with respect to the vegetation on the site and whether this provides habitat for any local threatened species. Importantly, the BDAR finds that the existing vegetation does not provide habitat for any threatened species and will not result in any serious or irreversible impacts to candidate species which would require offsets and credits. Notwithstanding, the BDAR identifies the following indirect impacts to habitat or vegetation as a result of the proposal:

- increased sedimentation during construction;
- introduction of weeds and pathogens during construction;
- dust emissions during construction;
- long term light spill during operation;
- noise during both construction and operation; and
- construction and long term impacts on water bodies, water quality and hydrological process.



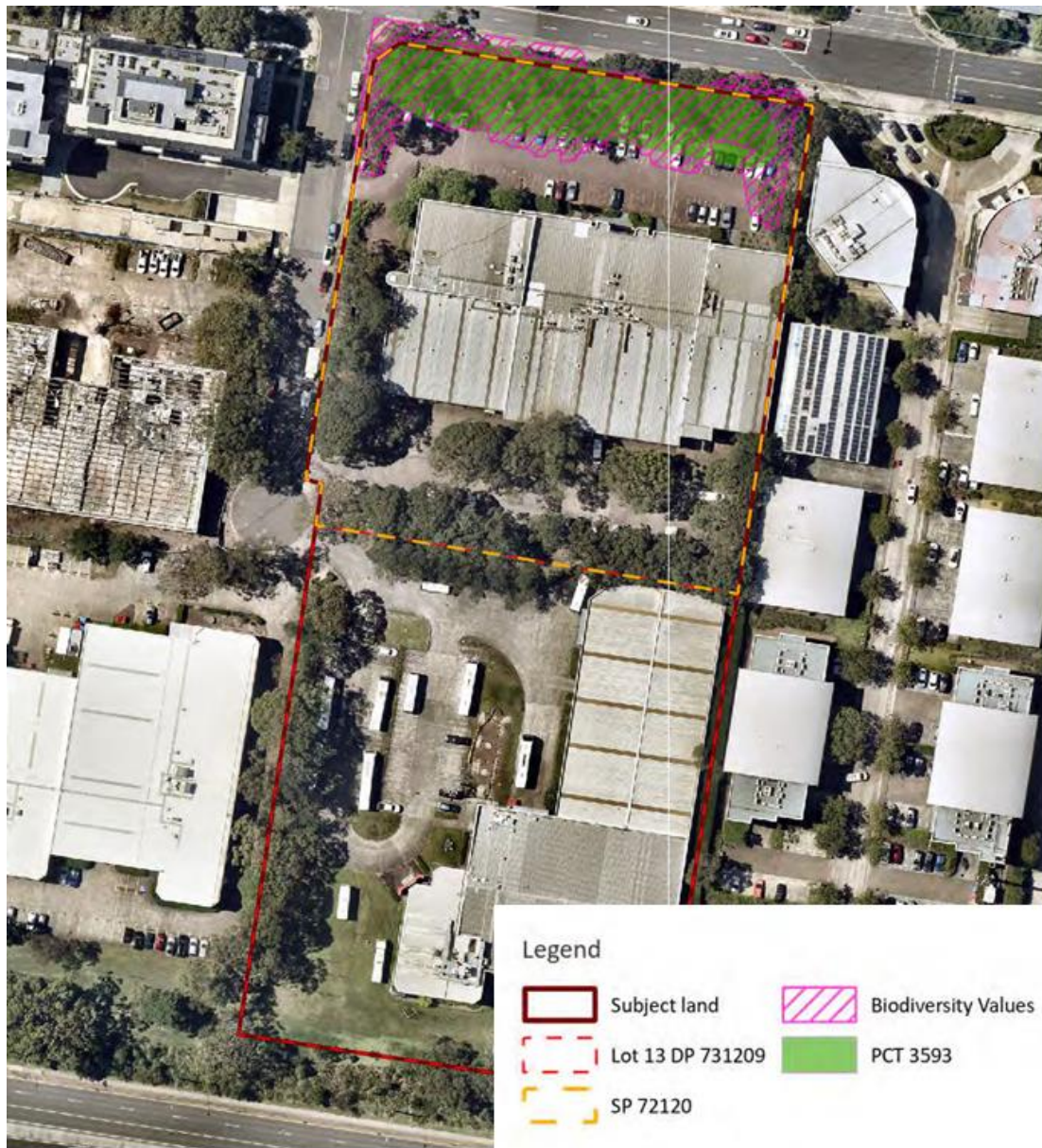


Figure 36: Biodiversity values land mapping and extent of vegetation (Source: Ecologique)

The above indirect impacts are proposed to be mitigated through the following mitigation measures which also form part of the Mitigation Measures at Appendix 2:

- preparation of a Construction and Environmental Management Plan;
- preparation of a Flora and Fauna Management Plan which would cover the following:
  - pre-clearance and clearance management of vegetation;
  - pre-demolition clearance;
  - fauna rescue and relocation protocol;
  - euthanasia protocol;
  - general biosecurity duty (GBD) compliance;
  - unexpected finds protocol; and
  - monitoring and reporting strategies.



The implementation of the above measures will ensure that the proposed development can effectively mitigate any impacts on flora and fauna during the construction and operation of the development.

## 6.12 Bushfire

A Bushfire Assessment accompanies this EIS at Appendix 23.

The Bushfire Assessment confirms that the site is not mapped as bushfire prone land or subject to a bushfire threat.

Accordingly, compliance with '*Planning for Bush Fire Protection 2019*' is not required.

The location of the site in proximity to bushfire-prone land is shown in the figure below.

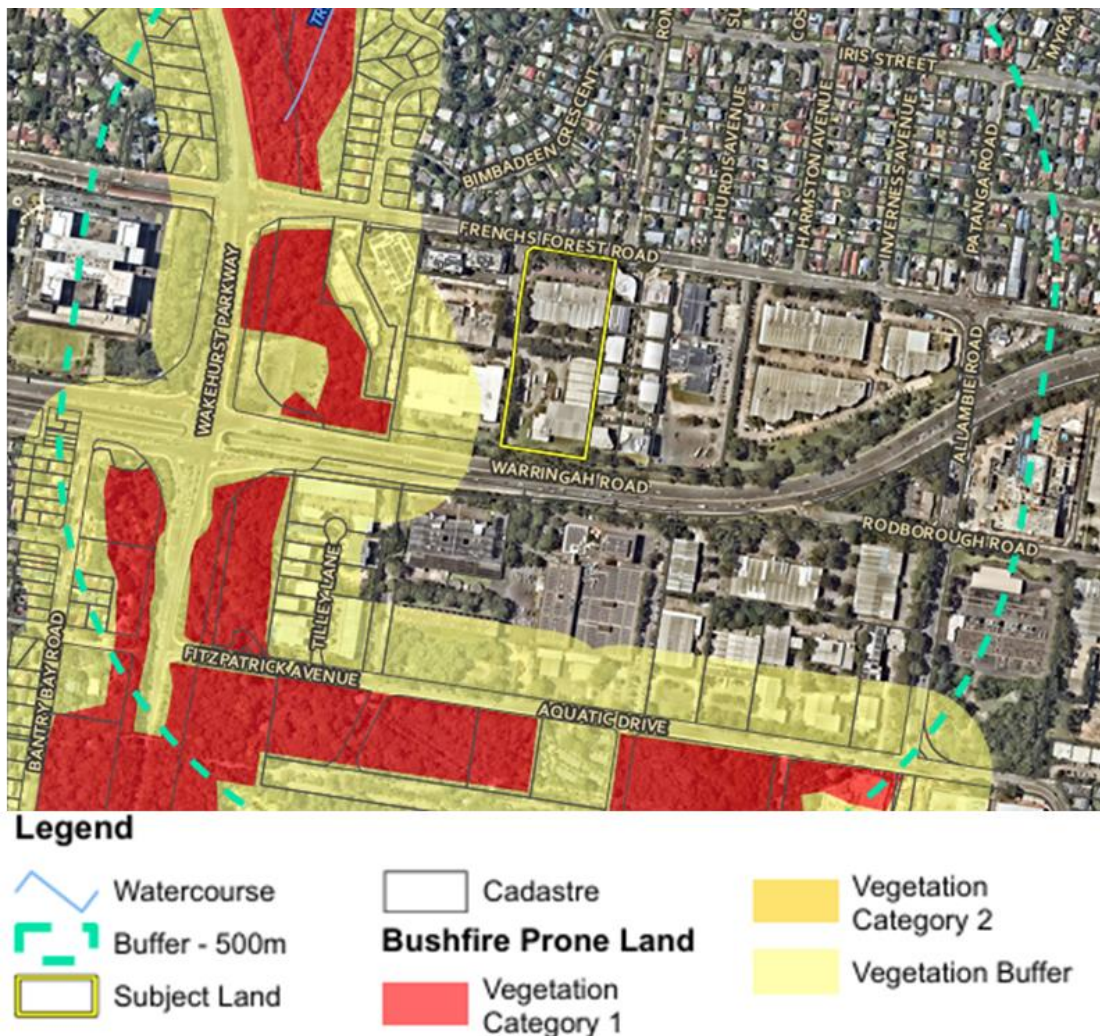


Figure 37 Bushfire Prone Land (Source: Peterson Bushfire)

## 6.13 Waste

An Operational Waste Management Plan (OWMP) has been prepared by Elephants Foot Consulting and included at Appendix 19. The OWMP addresses waste management for both Stage 1 and the future development at No. 3 Skyline Place.

The OWMP details the waste disposal procedures for both residents and future non-residential employment generating uses. In relation to residential uses, the OWMP details relevant waste disposal procedures for residents as follows:

- All units will be provided with a storage area capable of holding separate receptacles for general waste, comingled recycling, paper/cardboard recycling and FOGO.
- Internal unit waste bins will likely be provided in the kitchen area and include 40L receptacles (minimum) to account for 2 days' worth of general waste, comingled recycling, paper/cardboard recycling and 20L for FOGO storage.
- Residents are responsible for walking waste to single general waste chutes which will be installed in each building core.
- Separate 240L comingled recycling and paper/cardboard recycling bins will be provided in a compartment adjacent to the general waste chute for the storage of recycling.
- Residents of each unit will be provided with a kitchen caddy for the separation of FOGO.
- Each building core will be provided with a Communal FOGO Bin Room which contains 240L bins for FOGO. Residents will be responsible for walking their FOGO down to their respective Communal FOGO Bin Room and placing it into the bins.
- Each room in the RCF will be supplied with a 10L general waste and 10L recycling receptacle for residents and staff to dispose of general waste and recycling daily.
- Larger 60L general waste and 60L recycling receptacles will be provided throughout common areas of the RCF

It is expected that Council will collect the residential general waste, comingled recycling, paper/cardboard recycling and FOGO in accordance with Council's current collection schedule. This should be collected twice weekly.

In terms of the future non-residential employment generating uses, the OWMP provides estimates for required bins based on the proposed floor area provided. The estimated bin requirements are based upon an even distribution of the proposed non-residential areas across food, office and non-food tenancies. The estimated bin requirements for non-residential uses for both Nos. 1 and 3 Skyline Place are presented in the table below.

Site	General Waste	Recycling Waste	Weekly collections
No. 1 Skyline	10	4	3
No. 3 Skyline	5	2	2

Table 20: Non-residential waste bin requirement

In relation to the above, it is recognised that No. 1 Skyline Place will have a larger floor area of non-residential employment generating uses as reflected by the amount of bins required and weekly collections.

It is considered that based on the above and the conclusions of the OWMP, the proposed development can readily manage waste within the site.

## 6.14 Sustainability

An Ecologically Sustainable Development Report (ESD Report) has been prepared by Cundall to accompany this EIS and is provided at Appendix 11. The report outlines the key sustainability initiatives that have been implemented into the proposed design of the development to respond to ESD requirements. These key initiatives are provided below:

- *Minimise operational energy use through passive design and efficient building services and controls.*
- *On-site generation of renewable energy.*
- *Report on upfront carbon and investigate building materials with a lower embodied carbon.*
- *Procurement of more responsible materials, including best practice PVC and low-VOC finishes.*
- *Waste minimization plan implemented to reduce waste to landfill during demolition, construction and operation*
- *Water efficient fittings, fixtures, and air-conditioning.*
- *Rainwater harvesting for reuse in non-potable demands.*
- *Responsible management of stormwater pollution and runoff.*
- *Extensive landscaped area prioritizing low water-use, native species.*
- *Large communal areas for recreation and quiet reflection.*

The above initiatives are to be implemented within both the Concept and Stage 1 proposals to ensure compliance with the requirements of *State Environmental Planning Policy (Sustainable Buildings) 2022*. The above initiatives are addressed in the Mitigation Measures as provided at Appendix 2.

## 6.15 Hazards and risk

A Hazardous Materials Assessment (HazMat Assessment) has been prepared by GSNE Services Pty Ltd and provided at Appendix 17. The scope of works in preparing the HazMat Assessment included:

- *Conducting a site inspection to identify all areas of potential concern (such as roofing, insulation, switchboards, building materials etc);*
- *Site photographs;*
- *Interpretation of results and findings; and*
- *Recommendations and final conclusions drawn from the assessment results.*

Predominately, the HazMat Assessment investigates evidence of asbestos containing materials (ACM) and lead in paint materials within existing buildings at the site.

The HazMat Assessment found that there were no hazardous materials located at the site and therefore a 'Hazardous Materials Register' did not form part of the HazMat Assessment. The site therefore presents minimal environmental or human health concerns from asbestos, synthetic mineral fibres and lead in paint.

It is recommended that when the existing buildings are to be demolished, that all materials containing ACM are to be appropriately removed. This has been included as part of the Mitigation Measures at Appendix 2 accordingly.

## **6.16 Heritage**

An Aboriginal Cultural Heritage Assessment Report (ACHAR) and Statement of Heritage Impact (SoHI) have been prepared in accordance with the SEARs and are provided at Appendix 20 and Appendix 21 respectively. The findings of both the ACHAR and SoHI are discussed in the sections below.

### **6.16.1 Aboriginal Cultural Heritage**

An Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared by Navin Officer Heritage Consultants and is provided at Appendix 20.

The ACHAR has been prepared to identify any Aboriginal Heritage items within the site and any relevant significance of items. It is noted that the site is not identified as containing any objects or sites within the site area.

Notwithstanding, the ACHAR notes that the Frenchs Forest locality is known for being rich in Aboriginal art sites which are often contained in rock outcrops, containing evidence of occupation. There were no art sites located within the site area.

The ACHAR confirms that the proposed development is unlikely to harm Aboriginal objects or sites and therefore does not warrant any constraints on the proposed construction activity.

During the preparation of the ACHAR, Registered Aboriginal Parties (RAPs) were consulted whereby it was requested that during the construction phase of the development, monitoring for Aboriginal objects or sites be undertaken. The ACHAR states that monitoring is not recommended given the extensive disturbance that has already occurred at the site with respect to existing development whereby topsoil has already been removed.

Despite the presence of Aboriginal artefacts not being present at the site, the ACHAR recommends that an Unexpected Finds Protocol be implemented during the construction phase of the development. This has been included as part of the Mitigation Measures at Appendix 2.

### **6.16.2 European Heritage**

A Statement of Heritage Impact has been prepared by Navin Officer Heritage Consultants and provided at Appendix 21.

The report findings confirmed that the site has already been subject to disturbance through previous development and there is no physical evidence of its long term



historical use. The SoHI further confirms that the proposal will have no impact on heritage items in the vicinity of the site.

## 6.17 Environmental Wind Impact

An Environmental Wind Impact Study (EWIS) was completed by SLR Consulting and is provided at Appendix 27.

The report assesses key prevailing winds in the locality which are generally from the north-east, south-east and south for summer and mainly westerly winds for winter.

The review by SLR identified the following key areas may be affected by prevailing winds:

- Building C entrance
- Seating area on ground level
- Communal open space on Level 6 (Building C)
- Elevated corner balconies

To ensure the above areas are appropriately treated to mitigate wind impacts, an effective wind mitigation strategy should be implemented. This mitigation strategy includes:

- retention of existing trees on all sides of development to mitigate wind speed impacts;
- retain proposed awning above building entries to reduce wind speeds and retain trees near buildings entry points to mitigate impact;
- retain trees and landscaping at least 3m in height for effectiveness throughout the year;
- retain 1.8m of glazed balustrades/barriers along north and southern edge of communal space at level 6 building C;
- raise the balustrade height to 1.5m for corner balconies on level 6 of Buildings A, B and C, as well as at Level 7 of Buildings A and B and at Level 13 of Building C.

The above measures, as well as those further outlined in the EWIS, are to be included as part of the proposed Mitigation Measures provided at Appendix 2. These have been fully incorporated into the current design of the building and reflected in the Architectural Plans at Appendix 5.

## 6.18 Access

An Access Statement is provided at Appendix 37 which addresses how the Concept proposal is capable of complying with relevant accessibility requirements. The Statement has been prepared with consideration to the following documents and policies:

- *National Construction Code (NCC)/Building Code of Australia (BCA) 2022*
- *The Disability (Access to Premises - Buildings) Standards 2010*
- *Australian Standards (as relevant to the scope of works)*



- *State Environmental Planning Policy (Housing) 2021*

The Statement confirms the Concept proposal is capable of complying with the above policies as relevant. As the design develops for No. 1 Skyline Place, consideration is to be given to the following:

- *Access 'to and within part of the building normally occupied' as prescribed in clause D4D2 of the BCA.*
- *Access to the building from the main points of pedestrian entry at the allotment boundary.*
- *Access between buildings that are connected via a pedestrian link.*
- *Access to dedicated accessible car parking spaces.*
- *Access to communal areas and common facilities.*
- *Design to reflect and comply with the applicable accessibility design criteria specified in AS1428 (suite), AS/NZS2890.6-2009 and AS1735.12-1999.*
- *Compliance with State Environmental Planning Policy (Housing) 2021 – Chapter 3, Part 5 Housing for seniors and people with a disability.*

An Access Report has also been prepared and is provided at Appendix 38 to assess how the Stage 1 proposal addresses and meets all relevant access requirements.

The assessment confirms that the proposed Stage 1 development is capable of complying with the NCC/BCA 2022, The Disability (Access to Premises - Buildings) Standards 2010, relevant Australian Standards and Schedule 4 of the Housing SEPP, subject to the implementation of satisfactory resolutions as recommended in the report. This has been included as part of the Mitigation Measures at Appendix 2.

It is noted that the proposal does not require any performance solutions or result in any departures to compliance with the provisions of the NCC/BCA. Where compliance has not been achieved at this stage, further detail at the post-approval phase will ensure compliance with relevant provisions. It is noted that the proposal readily achieves compliance with all requirements of Schedule 4 of the Housing SEPP.

## 6.19 Crime Prevention Through Environmental Design

An analysis of Crime Prevention Through Environmental Design (CPTED) principles has been undertaken by Keylan Consulting within the accompanying CPTED Report provided at Appendix 35.

The assessment has been conducted using a three-step methodology as outlined below.

Methodology	Task
Review local context	<ul style="list-style-type: none"> <li>• Review of surrounding land uses</li> <li>• Site visit undertaken on 18 June 2024 between the hours of 9:00AM and 10:00AM - we understand no change has occurred to the site since this time which would change the recommendations of this report</li> </ul>

Methodology	Task
	<ul style="list-style-type: none"> <li>Analysis of Australian Bureau of Statistics and Bureau of Crime Statistics and Research data to understand the existing environmental context and crime activity</li> </ul>
CPTED analysis	<ul style="list-style-type: none"> <li>Review of the Architectural Plans prepared by Smith &amp; Tzannes (Appendix 1), Design Report prepared by Smith &amp; Tzannes and Matthew Pullinger Architect (Appendix 7 of the EIS) and Landscape Plans prepared by Paddock Landscape Architects (Appendix 10 of the EIS)</li> <li>Collection and analysis of local and NSW crime statistics from the Bureau of Crime Statistics and Research</li> <li>Review of the proposal against the CPTED principles identified in Section 1 above.</li> </ul>
Recommendations	<ul style="list-style-type: none"> <li>Provide design recommendations with respect to analysis undertaken above</li> </ul>

Table 21: CPTED Methodology

Utilising the above methodology, an assessment has been undertaken against each of the CPTED principles. This has been summarised in the table below which discusses how the proposal addresses each principle and where necessary, provides recommendations that could be implemented through the detailed design phase.

CPTED Principle	Assessment	Recommendations
Surveillance	<ul style="list-style-type: none"> <li>The proposed land uses attract activity on site and create opportunities for passive surveillance.</li> <li>Basement parking layout provides good sightlines by limiting visual obstructions.</li> <li>Ground floor open space is located centrally within a walking loop, creating sightlines into residential lobbies.</li> <li>Pathways are proposed along the eastern, southern and western boundaries to encourage natural wayfinding, dwellings are orientated to maximise passive surveillance over the paths.</li> <li>Seating is provided at the entrance and along the eastern boundary to increase potential for passive surveillance.</li> </ul>	<ul style="list-style-type: none"> <li>Include formal surveillance on a 24/7 basis.</li> <li>Provide appropriate lighting throughout all internal and external areas in accordance with Australian Standards.</li> <li>Provide sensor lighting within corridors and stairwells within residential components of the building to accommodate residents using the space at different times of the day.</li> <li>Provide glazing on the entrances to residential lobbies to maximise passive surveillance</li> </ul>

CPTED Principle	Assessment	Recommendations
	<ul style="list-style-type: none"> <li>All private open space faces with the public domain or communal open space.</li> <li>Vehicular entry is clearly identified and has unobstructed sightlines from the street to Building A.</li> </ul>	
Access control	<ul style="list-style-type: none"> <li>Direct basement access is provided within all buildings for safe access for residents.</li> <li>The entrance and exit to the site are provided in the north western corner of the site.</li> <li>Proposed landscaping is designed to manage access from outside and within the site</li> <li>Entry and exits are well positioned to deter crimes relating to trespassing, and damage of property</li> </ul>	<ul style="list-style-type: none"> <li>Implement access control measures such as pin codes/swipe cards/intercom to spaces which should not be publicly accessible (eg basement levels/residential components/mail room) to reduce the possibility of related crimes</li> <li>Install gates at the pedestrian and vehicular entry points to control access to private spaces</li> <li>Introduce signage to clarify who is permitted access in specified areas.</li> <li>Include a barrier between vehicular corridors and pedestrian spaces to reduce the risk of pedestrian and vehicle conflict.</li> </ul>
Territorial reinforcement	<ul style="list-style-type: none"> <li>The proposal includes an attractive landscape design which indicates active use and care, potentially deterring criminals</li> <li>Property boundaries are proposed to be clearly identifiable by boundary plantings including canopy trees along the western boundary.</li> <li>Fencing is proposed to secure ground floor open space and establish property boundaries.</li> <li>Different paving materials are used to establish different pathways/land uses.</li> </ul>	<ul style="list-style-type: none"> <li>Consider public art or textured surfaces to reduce vandalism</li> <li>Provide way finding signage</li> <li>Consider fences where appropriate</li> </ul>

CPTED Principle	Assessment	Recommendations
	<ul style="list-style-type: none"> <li>Using different paving materials creates a distinction between private property and the public footpath.</li> </ul>	
Space and activity management	<ul style="list-style-type: none"> <li>Routine maintenance will take place, preventing the site from appearing deteriorated.</li> <li>The proposed landscaping presents a positive image to the community.</li> </ul>	<ul style="list-style-type: none"> <li>Implement ongoing management to all access points to ensure they are not faulty.</li> <li>Use traffic calming measures to reduce risk of pedestrian and vehicle conflict</li> <li>Prepare a Plan of Management for communal areas, regarding strategies around regular cleaning, security and site maintenance.</li> </ul>

Table 22: CPTED analysis and recommendations (Source: Keylan)

In summary, the CPTED report demonstrates that the redevelopment of 3 Skyline Place, with the implementation of the recommendations, will address the requirements of CPTED and improve the safety of the surrounding area. The recommendations outlined in Table 22 above are also included as part of the Mitigation Measures at Appendix 2.

## 7 Project justification

The section provides a justification for the proposed development with consideration of market demands and the economic benefits that may be gained if the proposal was to proceed. This section also provides an analysis of the proposal with regard to alignment with strategic planning framework.

### 7.1 Design justification

As detailed in Section 6.1, the proposal has undergone a detailed design iteration process, including responding to feedback from the SDRP. In summary, the key design principles include:

- Siting of buildings based on a perimeter block form to maximise building separation, maximise vegetation retention and deep soil areas.
- Extensive landscaped areas.
- Varied building heights to provide a transition from lower scale residential development to the north and to minimise overshadowing and minimise overshadowing and wind impacts of the central communal open space.  
Specifically:
  - the provision of lower heights at the site's interface with Frenchs Forest Road noting the low density residential areas located to the north;
  - lower scaled buildings along Skyline Place to provide for a visual continuation;
  - siting taller scale buildings where visual impacts are lesser and have the least amenity impact on low density residential areas to the north;
  - appropriate height and scale of buildings on eastern boundary (specifically future Building 1E and proposed Building 3B) assist in reducing wind to the centralised communal open space; and
  - the tower form fronting Warringah Road is provided with articulation through different building elements and materials as proposed under the Stage 1 works
- Maximise site accessibility and circulation through a green boulevard along Skyline Place, linking to internal pedestrian links and internal roadways for emergency and service vehicle access.

The above design rationale is further reinforced through the demonstrated visual impacts as assessed under the VIA and discussed at Section 6.2. This has demonstrated that the proposal has been carefully located and designed to minimise visual impacts within the site's visual catchment. The VIA concludes that the proposed development will have a low to moderate visual impact in the short to medium term and is not substantially different from the existing context and built form.



## 7.2 Strategic justification

As demonstrated at Section 2 and in Appendix 3, the proposed development meets the objectives and directions outlined in the relevant strategic planning framework for the site, locality and broader region. In particular, the proposal meets the objectives of the:

- *Greater Sydney Region Plan* – The proposal satisfies the 4 key themes of the Region Plan, including Infrastructure and Collaboration, Liveability, Productivity and Sustainability
- *North District Plan* - the proposal satisfies a number of planning priorities, particularly in relation to facilitating diverse housing and employment opportunities in the Eastern City.
- *Northern Beaches Local Strategic Planning Statement* - The proposal is consistent with the objectives of the LSPS, specifically by facilitating an inclusive, healthy, safe and socially connected community and providing diverse and affordable housing in an accessible location.
- *Northern Beaches Community Strategic Plan* - The proposal will significantly contribute to the local economy and directly address the strategic direction of 'Housing, places and spaces'.
- *Northern Beaches Local Housing Strategy* - the proposal specifically responds to the strategy by providing a higher density seniors housing development within the Frenchs Forest precinct, which is named by the strategy as a locality with potential for additional housing.
- *Northern Beaches Hospital Precinct Structure Plan* - the Structure Plan identifies that the Frenchs Forest Business Park is expected to grow and mature under its current zoning to support the new hospital and deepen the locality's employment base.

In summary, the proposal is consistent with the above listed strategic plans as:

- it is consistent with long-standing State level strategic planning objectives to facilitate the provision of seniors housing in appropriate locations;
- it will increase housing supply and diversity and provide opportunities for older people to continue living in their community;
- it provides for higher order jobs to support the transition of the Business Park to support the Health and Education Precinct; and
- recent development consents in the locality reinforce the fact that the land use and built form character of the locality is continuing to evolve in accordance with its designation as a health and education precinct.

As such, it is considered the proposal aligns with the relevant strategic planning for the Northern Beaches local government area.

## 7.3 Statutory justification

As outlined in both Section 4 and at Appendix 4, the proposal aligns with all relevant statutory instruments which guide the development of the land. The proposal utilises the provisions of the Housing SEPP to appropriately locate a mixed use, seniors

housing development in a highly accessible site with nearby supporting health services. In this regard, it is noted that the Housing SEPP specifically makes seniors housing permissible on land zoned SP4 Enterprise under the WLEP 2011, which includes the subject site.

Additionally, the proposal exemplifies design excellence and superior design outcomes through providing significant amenity to future residents by exceeding minimum requirements of the ADG for solar access, cross ventilation and landscaped areas.

In addition to complying with and exceeding minimum requirements of the Housing SEPP, the proposal has also adequately addressed any other considerations of environmental planning including:

- the provision of a BDAR to satisfy the requirements of the *Biodiversity Conservation Act 2016* which demonstrates the proposal will not result in any tangible impact to native species, noting that there were no threatened ecological communities identified at the site;
- the provision of a PSI to satisfy the *Contaminated Lands Management Act 1997* and *State Environmental Planning Policy (Resilience and Hazards) 2021* which demonstrates the site may have some areas of environmental concern, however, this can be addressed through the preparation of a DSI which has been recommended as a condition of consent;
- provision of a BASIX Certificate and ESD Report which demonstrates that the proposal has implemented ESD principles to ensure an appropriate sustainability outcome at the site; and
- the preparation of a TIA which addresses relevant requirements of *State Environmental Planning Policy (Transport and Infrastructure) 2021* (also noting the application will also be referred to Transport for NSW for comment as it is identified as a 'traffic generating development' under Schedule 3 of the SEPP).

## 7.4 Social, economic and environmental justification

### 7.4.1 Social

Based on the findings of the social impact assessment, the proposed development is expected to have a net positive social impact on the local community, as a result of the mixed use, seniors housing development. Specifically:

- the provision of ILUs in close proximity to the Frenchs Forest Town Centre Precinct, which includes the hospital, future town centre and a wide range of supporting health services;
- the provision of a modern RCF that will provide opportunities for seniors at 1 and 3 Skyline Place to age in place and receive the appropriate level of care without having to relocate;
- the proposed development includes a provision of 5% of the floorspace for ILUs as affordable housing to be managed by a community housing provider;
- the development facilitates 546sqm of employment generating floorspace within Stage 1 and will provide a further 1200sqm plus of employment floorspace in the

future when No. 1 Skyline Place is developed in accordance with the concept proposal; and

- the creation of open spaces that facilitate social interactions among residents, their families, and the local community and the provision of onsite amenities to support the social and recreational needs of residents. These spaces also provide opportunities for passive and active recreation.

#### **7.4.2 Economic**

The proposed development involves a significant capital investment of over \$343 million (inc. GST) across the entire concept proposal.

The financial investment will facilitate the future development of a contemporary seniors living development, providing supporting employment generating uses across a total 1,700m<sup>2</sup> of floor area. The proposal will enhance the functionality and appeal of the Frenchs Forest Business Park through diversifying the uses whilst minimising land use conflict through careful site planning including orienting commercial spaces toward other commercial/industrial buildings and uses

The development of the mixed use and seniors housing project would also support up to 465 direct job-years and 1,253 indirect job-years during construction.

#### **7.4.3 Environmental**

Under the National Strategy for Ecologically Sustainable Development (1992), ESD is defined as, 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased.'

The *Environmental Planning and Assessment Act 1979* utilises the definition of ESD from Part 3, Clause 6(2) of the *Protection of the Environment Administration Act 1991*, wherein ESD can be achieved through the implementation of a set of principles and programs.

The proposal has been assessed under these principles in the below sections and additionally, under the accompanying ESD Report at Appendix 11.

##### **The precautionary principle**

The precautionary principle states that if there are threats of serious or irreversible environmental damage, the lack of full scientific certainty should not be used as a reason for postponing measures to prevent said damage.

Detailed investigations relating to the geological, environmental and economic aspects of the proposal have been undertaken with the aim to produce an optimal design that balances the environmental constraints of the site with the contextual opportunities.

The development of the site as outlined in this EIS and supporting technical assessments, provides the current optimised proposal, which takes into consideration all physical, environmental, social, cultural heritage and economic aspects which are required to be addressed.

The information supporting this proposal demonstrates that there is sufficient certainty of the environmental impacts associated with the proposal and that these impacts are acceptable and can be mitigated.

### **Inter-generational equity**

Inter-generational equity refers to the principle that the current generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations. The proposal is aimed at enhancing housing and lifestyle opportunities for seniors to age in place with community and support networks.

### **Conservation of biological diversity and maintenance of ecological values**

The third principle of ESD states that the conservation of biological diversity and ecological integrity should be a fundamental consideration in development applications.

The potential environmental impacts of the proposal have been detailed throughout this EIS, with mitigation measures and proposed offsets described.

The proposal has been the subject of a thorough ecological assessment as detailed in Section 6.11 and as informed by the BDAR contained at Appendix 13.

## Appendix 1: Secretary's Environmental Assessment Requirements

This EIS has been prepared in line with the SEARs issued by DPHI on 15 May 2024 and in line with Part 8, Division 2, Section 173 of the EP&A Regulation 2021.

The SEARs and where they are addressed in this EIS are set out in the table below.

Environmental assessment requirement	EIS reference	Supporting documentation
General requirements		
The EIS must be prepared in line with and meet the minimum requirements of section 192 of the Environmental Planning and Assessment Regulation 2021.	All	<ul style="list-style-type: none"> <li>Environmental Impact Statement</li> </ul>
Key issues		
Statutory and strategic context, including: <ul style="list-style-type: none"> <li>Address all relevant legislation, environmental planning instruments (EPIs) (including drafts), plans, policies, and guidelines.</li> <li>Identify compliance with applicable development standards and provide a detailed justification for any non-compliances.</li> <li>Provide an explanation of how the development as described in the EIS is consistent with the development as was described in the request for SEARs (including any components that were not SSD) and provide a justification for any differences.</li> <li>Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.</li> </ul>	Sections 2 Section 4 Appendix 3 Appendix 4	<ul style="list-style-type: none"> <li>Strategic Planning Assessment</li> <li>Statutory Compliance Tables</li> </ul>
Estimated Development Cost and Employment, including: <ul style="list-style-type: none"> <li>Address the requirements of any approvals applying to the site, including any concept approval or recommendation from any Gateway determination.</li> <li>The EDC Report must specify the EDC of the seniors housing component of the development.</li> </ul>	Appendix 25 Appendix 6	<ul style="list-style-type: none"> <li>Estimated Development Cost Report</li> <li>Economic Impact Statement</li> </ul>



Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>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.</li> </ul>		
<p>Land Use and Economic Impacts, including:</p> <ul style="list-style-type: none"> <li>Provide an Economic Impact Statement which addresses: <ul style="list-style-type: none"> <li>how the proposal addresses the objectives of the SP4 Enterprise zone</li> <li>the quantum, design and viability of the proposed commercial floor space on the site</li> <li>the demand for commercial floor space on the site and surrounding land.</li> </ul> </li> <li>the economic impacts of the proposal on the Frenchs Forest Business Park and employment opportunities more broadly in Northern Beaches.</li> </ul>	<p>Section 6.4 Section 7.5 Appendix 6</p>	<ul style="list-style-type: none"> <li>Economic Impact Statement</li> </ul>
<p>Design Quality, including: Demonstrate how the concept and Stage 1 development will achieve:</p> <ul style="list-style-type: none"> <li>design excellence in accordance with any applicable EPI provisions.</li> <li>good design in accordance with the seven objectives for good design in Better Placed.</li> <li>Demonstrate that the development has been reviewed by the State Design Review Panel (SDRP).</li> </ul>	<p>Section 6.1 Appendix 7</p>	<ul style="list-style-type: none"> <li>Design Report</li> </ul>
<p>Built Form and Urban Design, including:</p> <ul style="list-style-type: none"> <li>Explain and illustrate the proposed concept and Stage 1 built form, including a detailed site and context analysis to justify the proposed site planning and design approach.</li> <li>Demonstrate how:</li> </ul>	<p>Section 6.1 Appendix 5 Appendix 7 Appendix 37 Appendix 38</p>	<ul style="list-style-type: none"> <li>Architectural Plans</li> <li>Design Report</li> <li>Access Statement</li> <li>Access Report</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>○ the concept and Stage 1 development considers the design principles in Part 5, Division 6 of State Environmental Planning Policy (Housing) 2021 and the Seniors Housing Guidelines 2021.</li> <li>○ the proposed concept and Stage 1 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.</li> <li>○ the Stage 1 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.</li> <li>• Demonstrate how the concept and Stage 1 development responds to the surrounding development in regards to bulk, height and scale.</li> <li>• Assess how the concept proposal is capable of complying, and that the Stage 1 development complies, with the relevant accessibility requirements.</li> </ul>		
<p>Environmental Amenity, including:</p> <ul style="list-style-type: none"> <li>• Address how good internal and external environmental amenity is achieved for the concept and Stage 1 development, including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces.</li> <li>• Assess amenity impacts of the concept and Stage 1 development 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.</li> </ul>	<p>Sections 6.1 Section 6.3 Appendix 27 Appendix 5</p>	<ul style="list-style-type: none"> <li>• Environmental Wind Impact</li> <li>• Architectural Plans including <ul style="list-style-type: none"> <li>○ Shadow Diagrams</li> </ul> </li> <li>• Design Report</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>Provide a solar access analysis of the overshadowing impacts of the concept and Stage 1 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).</li> <li>For any applicable parts of the development, provide an assessment against SEPP 65 and the Apartment Design Guideline.</li> </ul>		
<p>Visual Impact, including:</p> <ul style="list-style-type: none"> <li>Provide a visual analysis of the concept building envelopes and Stage 1 development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development.</li> <li>Provide a visual impact assessment that addresses the potential impacts of the Concept and Stage 1 development on the existing catchment.</li> </ul>	<p>Section 6.2 Appendix 8</p>	<ul style="list-style-type: none"> <li>Visual Impact Assessment</li> </ul>
<p>Public Space, including:</p> <ul style="list-style-type: none"> <li>Demonstrate how the Concept and Stage 1 development maximises the amount, access to and quality of public spaces (including any 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.</li> <li>Demonstrate how the Concept and Stage 1 development: <ul style="list-style-type: none"> <li>ensures that public space is welcoming, attractive and accessible for all.</li> <li>maximises permeability and connectivity.</li> <li>maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection.</li> </ul> </li> </ul>	<p>Section 6.1 Section 6.3 Section 6.19 Appendix 7 Appendix 35</p>	<ul style="list-style-type: none"> <li>Design Report</li> <li>CPTED Report</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>○ maximises street activation.</li> <li>○ minimises potential vehicle, bicycle and pedestrian conflicts.</li> <li>• Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the Stage 1 development, in accordance with Crime Prevention and the Assessment of Development Applications Guidelines.</li> </ul>		
<p>Trees and Landscaping, including:</p> <ul style="list-style-type: none"> <li>• Assess the number, location, condition and significance of trees to be removed and retained as a result of the anticipated concept and Stage 1 development and note any existing canopy coverage to be retained on-site.</li> <li>• Provide a concept site-wide landscape plan and a detailed Stage 1 landscape plan, that: <ul style="list-style-type: none"> <li>○ details the proposed site planting, including location, number and species of plantings, heights of trees at maturity and proposed canopy coverage (as a percentage of the site area).</li> <li>○ Provides evidence that opportunities to retain significant trees have been explored and/or informs the plan.</li> <li>○ demonstrates how the proposed development would:</li> </ul> </li> <li>• contribute to long term landscape setting in respect of the site and streetscape.</li> <li>• mitigate the urban heat island effect and ensure appropriate comfort levels on-site.</li> <li>• contribute to an increase in urban tree canopy cover.</li> <li>• maximise opportunities for green infrastructure, consistent with Greener Places and having regard to any bush fire risk.</li> </ul>	<p>Section 6.3 Appendix 9 Appendix 10</p>	<ul style="list-style-type: none"> <li>• Arboricultural Impact Assessment</li> <li>• Landscape Plan</li> </ul>
<p>Ecologically Sustainable Development (ESD), including:</p>	<p>Section 6.14 Appendix 11</p>	<ul style="list-style-type: none"> <li>• Ecologically Sustainable Development Report</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>Identify how ESD principles (as defined in section 193 of the EP&amp;A Regulation) are incorporated in the design and ongoing operation of the development.</li> <li>Demonstrate how the concept and Stage 1 development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards.</li> <li>Demonstrate how the concept and Stage 1 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.</li> </ul>	Appendix 29	<ul style="list-style-type: none"> <li>BASIX Certificate</li> </ul>
<p>Traffic, Transport and Accessibility, including:</p> <ul style="list-style-type: none"> <li>Provide a transport and accessibility impact assessment for the concept and Stage 1 development, which includes: <ul style="list-style-type: none"> <li>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.</li> <li>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</li> <li>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.</li> </ul> </li> </ul>	<p>Section 6.5</p> <p>Appendix 12</p> <p>Appendix 33</p> <p>Appendix 34</p>	<ul style="list-style-type: none"> <li>Transport and Accessibility Impact Assessment</li> <li>Construction Traffic Management Plan</li> <li>Green Travel Plan</li> </ul>



Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>○ analysis of the impacts of the proposed development during construction and operation (including justification for the methodology used), including predicted modal split, a forecast of additional 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.</li> <li>○ 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.</li> <li>○ 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.</li> <li>● Provide a preliminary Construction Traffic Management Plan for Stage 1 detailing predicted construction vehicle 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.</li> </ul>		

Environmental assessment requirement	EIS reference	Supporting documentation
<p>Biodiversity, including:</p> <ul style="list-style-type: none"> <li>Assess any biodiversity impacts associated with the concept and Stage 1 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.</li> <li>If the concept and Stage 1 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.</li> </ul>	<p>Section 6.11 Appendix 13</p>	<ul style="list-style-type: none"> <li>Biodiversity Development Assessment Report</li> </ul>
<p>Noise and vibration, including</p> <ul style="list-style-type: none"> <li>Provide a noise and vibration assessment for the concept and Stage 1 development prepared in accordance with the relevant NSW Environment Protection Authority (EPA) guidelines. The assessment must: <ul style="list-style-type: none"> <li>detail construction and operational noise and vibration impacts on nearby sensitive receivers and structures</li> <li>consider noise intrusion from nearby roads and any other potential noise generating sources in the locality</li> <li>outline the proposed management and mitigation measures that would be implemented.</li> </ul> </li> </ul>	<p>Section 6.6 Appendix 14</p>	<ul style="list-style-type: none"> <li>Noise and Vibration impact assessment</li> </ul>
<p>Ground and water conditions, including</p> <ul style="list-style-type: none"> <li>Assess potential impacts on soil resources and related infrastructure and riparian lands on and near the site, including soil erosion, salinity and acid sulfate soils.</li> <li>Provide a Surface and Groundwater Impact Assessment for the Concept and Stage 1 development that assesses potential impacts on:</li> </ul>	<p>Section 6.8 Appendix 28 Appendix 26 Appendix 39</p>	<ul style="list-style-type: none"> <li>Geotechnical Assessment</li> <li>Surface and Groundwater Impact Assessment</li> <li>Acid Sulphate Soils Conditions Report</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>○ surface water resources (quality and quantity) including related infrastructure, hydrology, dependent ecosystems, drainage lines, downstream assets and watercourses.</li> <li>○ groundwater resources in accordance with the relevant Groundwater Guidelines.</li> </ul>		
<p>Water management, including</p> <ul style="list-style-type: none"> <li>• Provide an Integrated Water Management Plan for the concept and Stage 1 development that: <ul style="list-style-type: none"> <li>○ is prepared in consultation with the local council and any other relevant drainage or water authority.</li> <li>○ outlines the water-related servicing infrastructure required by the development (informed by the anticipated annual and ultimate increase in servicing demand) and evaluates opportunities to reduce water demand (such as recycled water provision).</li> <li>○ details the proposed drainage design (stormwater and wastewater) for the site including any on-site treatment, reuse and detention facilities, water quality management measures, and nominated discharge points.</li> <li>○ demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse downstream impacts</li> </ul> </li> <li>• Where water and 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.</li> </ul>	<p>Section 6.8 Appendix 16</p>	<ul style="list-style-type: none"> <li>• Water Management Plan</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<p>Flooding risk, including</p> <ul style="list-style-type: none"> <li>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 Flood Risk Management Manual.</li> <li>Where the concept and Stage 1 development could alter flood behaviour, affect flood risk to the existing community or expose its users to flood risk, provide a flood impact and risk assessment (FIRA) prepared in accordance with the Flood Impact and Risk Assessment – Flood Risk Management Guide LU01.</li> <li>Detail design solutions and operational procedures to mitigate flood risk where required.</li> </ul>	<p>Section 6.9 Appendix 16</p>	<ul style="list-style-type: none"> <li>Flood Impact Risk Assessment within Water Management Plan</li> </ul>
<p>Hazards and risks, including</p> <ul style="list-style-type: none"> <li>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.</li> <li>Where required by Chapter 3 of 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.</li> <li>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.</li> </ul>	<p>Section 6.15 Appendix 17</p>	<ul style="list-style-type: none"> <li>Hazardous Materials Report</li> </ul>
<p>Contamination and remediation, including</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Section 6.10 Appendix 18</p>	<ul style="list-style-type: none"> <li>Preliminary Site Investigation</li> </ul>
<p>Waste management, including</p>	<p>Section 6.13 Section 6.15 Appendix 19</p>	<ul style="list-style-type: none"> <li>Waste Management Plan</li> <li>Hazardous Materials Report</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>Identify, quantify and classify the likely waste streams to be generated during construction and operation of the concept and Stage 1 development.</li> <li>Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste.</li> <li>Identify appropriate servicing arrangements for the site.</li> <li>If buildings are proposed to be demolished or altered, provide a hazardous materials survey.</li> </ul>	Appendix 17	
<p>Aboriginal cultural heritage, including:</p> <ul style="list-style-type: none"> <li>Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.</li> </ul>	<p>Section 6.16</p> <p>Appendix 20</p>	<ul style="list-style-type: none"> <li>Aboriginal Cultural Heritage Assessment Report</li> </ul>
<p>Environmental heritage, including :</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	<p>Section 6.16</p> <p>Appendix 21</p>	<ul style="list-style-type: none"> <li>Statement of Heritage Impact</li> </ul>
<p>Social impact, including:</p> <ul style="list-style-type: none"> <li>Provide a Social Impact Assessment prepared in accordance with the Social Impact Assessment Guidelines for State Significant Projects.</li> <li>Address the suitability of the site for the proposed development having regard to the amenity of the site and accessibility for future residents to services, amenities and recreation opportunities.</li> </ul>	<p>Section 6.7</p> <p>Appendix 22</p>	<ul style="list-style-type: none"> <li>Social Impact Assessment</li> </ul>
Aviation, including:	N/A	<ul style="list-style-type: none"> <li>N/A</li> </ul>



Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>If the development proposes a helicopter landing site (HLS), assess its potential impacts on the flight paths of any nearby airport, airfield or HLS.</li> <li>If the site contains or is adjacent to a HLS, assess the impacts of the development on that HLS.</li> </ul>		
<p>Infrastructure requirements and utilities, including:</p> <ul style="list-style-type: none"> <li>In consultation with relevant service providers: <ul style="list-style-type: none"> <li>assess the impacts of the concept and Stage 1 development on existing utility infrastructure and service provider assets surrounding the site.</li> <li>identify any infrastructure required on-site and off-site to facilitate the concept and Stage 1 development and any arrangements to ensure that the upgrades will be implemented on time and be maintained.</li> <li>provide an infrastructure delivery and staging plan, including a description of how infrastructure requirements would be co-ordinated, funded and delivered to facilitate the concept and Stage 1 development.</li> </ul> </li> </ul>	Appendix 36	<ul style="list-style-type: none"> <li>Infrastructure Requirements and Staging Plan</li> </ul>
<p>Bush fire risk, including:</p> <ul style="list-style-type: none"> <li>If the development is on mapped bush fire prone land, or a bush fire threat is identified on or adjoining the site, provide a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection.</li> </ul>	Section 6.12 Appendix 23	<ul style="list-style-type: none"> <li>Bush Fire Assessment</li> </ul>
<p>Construction, operation and staging, including:</p> <ul style="list-style-type: none"> <li>Provide details of how the development would be staged and any impacts mitigated.</li> </ul>	Section 3	<ul style="list-style-type: none"> <li>EIS</li> </ul>
Contributions and public benefit, including:	Section 4.4 Section 7.5	<ul style="list-style-type: none"> <li>EIS</li> </ul>

Environmental assessment requirement	EIS reference	Supporting documentation
<ul style="list-style-type: none"> <li>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.</li> <li>Where the concept and Stage 1 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.</li> </ul>		
<p>Engagement</p> <ul style="list-style-type: none"> <li>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: <ul style="list-style-type: none"> <li>the relevant Department assessment team.</li> <li>any relevant local councils.</li> <li>any relevant agencies</li> <li>the community.</li> <li>if the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&amp;A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&amp;A Act, the agency relevant to that approval or authorisation.</li> </ul> </li> </ul>	<p>Section 5 Appendix 24</p>	<ul style="list-style-type: none"> <li>Engagement Report</li> </ul>
<p>Cover letter matters, including:</p> <ul style="list-style-type: none"> <li>Northern Beaches LEP</li> </ul>	<p>Section 3.3</p>	<p>EIS</p>

## Appendix 2: Mitigation measures table

Potential impact	Mitigation measure	EIS ref
Noise	<ul style="list-style-type: none"> <li>Adherence to the construction noise management levels as outlined in Table 14 of the NVIA.</li> <li>Adherence to the maximum vibration limits as presented in Table 18 of the NVIA.</li> <li>Implementation of the 'Complying Constructions' as detailed in Section 6.2 of the NVIA.</li> <li>Preparation of a Construction Noise and Vibration Management Plan (CNVMP).</li> </ul>	Section 6.6 Appendix 14
Contamination	<ul style="list-style-type: none"> <li>Preparation of a Detailed Site Investigation as a condition of consent.</li> </ul>	Section 6.10 Appendix 18
Aboriginal Heritage	<ul style="list-style-type: none"> <li>Implementation of an Unexpected Finds Protocol during the construction of the Stage 1 works.</li> </ul>	Section 6.16.1 Appendix 20
Ecology	<ul style="list-style-type: none"> <li>Preparation of a Construction and Environmental Management Plan;</li> <li>Preparation of a Flora and Fauna Management Plan which would cover the following: <ul style="list-style-type: none"> <li>pre-clearance and clearance management of vegetation;</li> <li>pre-demolition clearance;</li> <li>fauna rescue and relocation protocol;</li> <li>euthanasia protocol;</li> <li>general biosecurity duty (GBD) compliance;</li> <li>unexpected finds protocol; and</li> <li>monitoring and reporting strategies.</li> </ul> </li> </ul>	Section 6.11 Appendix 13
Traffic	<ul style="list-style-type: none"> <li>Implementation of the Construction Traffic Management Plan (CTMP)</li> <li>Implementation of the Green Travel Plan (GTP)</li> </ul>	Appendix 12
Sustainability	<ul style="list-style-type: none"> <li>Implementation of the key initiatives listed within the ESD Report, including: <ul style="list-style-type: none"> <li>minimising operational energy use through passive design and efficient building services and controls;</li> <li>on-site generation of renewable energy</li> <li>reporting on upfront carbon, and investigate building materials with a lower embodied carbon;</li> <li>procurement of more responsible materials, including best practice PVC and low-VOC finishes;</li> </ul> </li> </ul>	Section 6.14 Appendix 11

Potential impact	Mitigation measure	EIS ref
	<ul style="list-style-type: none"> <li>○ implementation of a waste minimisation plan to reduce waste to landfill during demolition, construction and operation;</li> <li>○ utilising water efficient fittings, fixtures, and air-conditioning;</li> <li>○ rainwater harvesting for reuse in non-potable demands;</li> <li>○ responsible management of stormwater pollution and runoff;</li> <li>○ extensive landscaped area prioritizing low water-use, native species; and</li> <li>○ large communal areas for recreation and quiet reflection.</li> </ul>	
Hazardous Materials	<ul style="list-style-type: none"> <li>● If asbestos contaminated materials are identified during demolition, these materials are to be removed from the site appropriately and in compliance with the relevant regulation.</li> </ul>	Section 6.15 Appendix 17
Social Impacts	<ul style="list-style-type: none"> <li>● Any construction related impacts will be appropriately managed through the CTMP as provided at Appendix 12 and through the preparation of a CMVMP.</li> </ul>	Section 6.7 Section 6.5 Appendix 22 Appendix 12
Wind	<ul style="list-style-type: none"> <li>● Implementation of a wind mitigation strategy, including the measures as outlined in Section 6.0 of the Environmental Wind Impact Study.</li> </ul>	Section 6.17 Appendix 27
Surface water and groundwater	<ul style="list-style-type: none"> <li>● Implementation of the surface water and groundwater impact mitigation methods as outlined at Section 6 of the Surface Water and Groundwater Impact Assessment and summarised in Table 19 within this EIS.</li> </ul>	Section 6.8.2 Appendix 39
Stormwater	<ul style="list-style-type: none"> <li>● Implementation of the stormwater management strategy as outlined in the accompanying Integrated Water Management Plan and as summarised in this EIS.</li> </ul>	Section 6.8.4 Appendix 16
Access	<ul style="list-style-type: none"> <li>● Implementation of the satisfactory resolutions as recommended in Sections 9 and 10 of the Access Report.</li> </ul>	Section 6.18 Appendix 38
CPTED	<ul style="list-style-type: none"> <li>● Implementation of the recommendations outlined in the accompanying CPTED Report and as summarised within this EIS Report at Table 22.</li> </ul>	Section 6.19 Appendix 35

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## Greater Sydney Region Plan

The *Greater Sydney Region Plan* (Region Plan) outlines how Greater Sydney will manage growth and change in the context of social, economic and environmental matters. It sets the vision and strategy for Greater Sydney, to be implemented at a local level through District Plans.

The overriding vision for Greater Sydney in the Region Plan is to rebalance Sydney into a metropolis of 3 unique but connected cities:

- the established Eastern Harbour City
- the developing Central River City
- the emerging Western Parkland City

Historically, Greater Sydney's jobs and transport have been focused to the east, requiring many people to make long journeys to and from work and other services. The 3 cities vision allows opportunities and resources to be shared more equitably while enhancing the local character we value in our communities. By integrating land use, transport links and infrastructure across the three cities, more people will have access within 30 minutes to jobs, schools, hospitals and services.

The Region Plan provides broad priorities and actions, which focus on the following 4 key themes:

- Infrastructure and collaboration
- Liveability
- Productivity
- Sustainability

There are a number of directions and objectives that are of particular relevance to the Proposal which are addressed below:

Directions	Objectives
Objective 4: Infrastructure use is optimised	<ul style="list-style-type: none"><li>• The development is located adjacent to the mapped Frenchs Forest Town Centre.</li><li>• Co-locating a seniors housing development near the Northern Beaches Hospital and public transport routes makes use of existing infrastructure.</li></ul>
Objective 7: Communities are healthy, resilient and socially connected	<ul style="list-style-type: none"><li>• The development will support an active lifestyle for the residents by providing communal open space and recreation facilities being within walking distance of public transport and other facilities.</li><li>• The community facilities provided in the development will encourage social connection between the residents.</li></ul>

Directions	Objectives
Objective 10: Greater housing supply	<ul style="list-style-type: none"> <li>The Plan recognises the importance of the provision of housing and meeting housing demand by responding to the housing needs, choice and demographic characteristics of the existing and future community. The proposal will contribute to the provision of housing diversity through the provision of approximately 350 seniors ILUs, including 200 ILUs and a 20 bed RCF in the Stage 1 DA, within close proximity to a range of services, including health services and the future Frenchs Forest Town Centre, by foot or by public transport.</li> <li>The proposed development will provide for a significant number of seniors housing units, contributing to the housing targets for the Eastern City. The housing supply will be delivered as part of a mixed-use development which incorporates communal open space and recreation facilities, employment generating uses and seniors housing.</li> <li>The development will predominantly attract seniors who live in the vicinity of the site. Accordingly, when seniors move from their existing houses, these houses will be added to the market and increase supply for purchasers such as younger families, resulting in the provision of housing that better satisfies diverse demographic needs.</li> </ul>
Objective 11: Housing is more diverse and affordable	<ul style="list-style-type: none"> <li>The proposed development will provide a significant number of dwellings to meet the growing proportion of smaller households in close proximity to health and commercial services. The number of homes will increase the supply of seniors housing in the Frenchs Forest area, addressing the changing demographic needs of the surrounding area.</li> <li>The proposal also includes the provision of affordable housing units and disability housing, ensuring a diverse and cohesive housing development.</li> </ul>
Objective 12: Great places that bring people together	<ul style="list-style-type: none"> <li>The proposal will provide well-designed communal open spaces which will encourage and cater for social interaction of future residents and workers on the site.</li> <li>Non-residential uses on the site will also provide retail, health and other services for future residents and workers.</li> </ul>

Directions	Objectives
<p>Objective 21: Internationally competitive health, education, research and innovation precincts</p>	<ul style="list-style-type: none"> <li>• The Plan recognises the importance of the co-location of health services, aged care, accommodation and supporting transport infrastructure. The Plan encourages a mix of retail, supporting services and accommodation adjacent to new health precincts. The proposed development supports the health-based precinct through the introduction of residential accommodation, employment generating uses and daily services on a site that is within the Frenchs Forest Health and Education Precinct, and in close proximity to the Northern Beaches Hospital and the future Frenchs Forest Town Centre that is well serviced by public transport.</li> <li>• The co-location of health services, such as those within the Northern Beaches Hospital Precinct and the proposed seniors housing and complementary employment generating uses, is consistent with the collaboration, innovation and accessibility outcomes identified within the Region Plan. The proposal will provide convenient and safe access for ageing residents to essential health related services.</li> </ul>
<p>Objective 22: Investment and business activity in centres</p>	<ul style="list-style-type: none"> <li>• The Region Plan recognises that the creation of jobs and provision of services can be initiated within business parks and that these need to be developed from the outset as urban places which can transition into higher amenity and vibrant places while maintaining their main role as an employment precinct. The Plan further states Council's retail and employment strategies should provide further guidance on the transition of business parks into mixed employment precincts, including residential development, to support the business park.</li> <li>• The site is strategically located in the Frenchs Forest Strategic Centre in the North District. The Frenchs Forest Strategic Centre is identified as a health and education precinct. The site is generally consistent with the priorities and actions of the plan, as it provides appropriate and ancillary uses to the health and education precinct, including residential and employment opportunities, which are consistent with the changing character of the Frenchs Forest area and the transition of the Frenchs Forest business Park into a mixed employment precinct with complementary residential development.</li> </ul>

Directions	Objectives
	<ul style="list-style-type: none"> <li>The Economic Impact Statement prepared by Hadron Group (Appendix 6) demonstrates that the proposal includes land uses that generate contemporary employment opportunities and economic output of the Business Park and the broader Frenchs Forest Health and Education Precinct.</li> <li>The proposal will also support an onsite population which can retain retail expenditure within the local area and increase the viability of developing the proposed nearby Frenchs Forest Town Centre.</li> </ul>
Objective 23: Industrial and urban services land is planned, retained and managed	<ul style="list-style-type: none"> <li>The Greater Sydney Region Plan requires the retention of and management of industrial and urban services land. The site is not zoned industrial. The land is zoned for 'Enterprise' (formerly Business Park) purposes which the Plan states should be identified for transition including ancillary residential development. Furthermore, the site and locality is not identified as industrial and urban services land in Figure 17 of the North District Plan, further considered below.</li> <li>It is also noted that under the provisions of the Housing SEPP, seniors housing is specifically permitted on land within the SP4 Enterprise zone under the Warringah LEP 2011.</li> </ul>
Objective 30: Urban tree canopy cover is increased	<ul style="list-style-type: none"> <li>As detailed in the Landscape Plans at Appendix 10, the proposal retains the majority of trees within the site whilst proposing to replace those required for removal by significantly increasing the number of trees within the site. This also includes an increase in deep soil provision at the site whereby the proposal will accommodate over 200 new tree plantings and therefore support the development of long-term tree canopy growth.</li> </ul>
Objective 33: A low-carbon city contributes to net-zero emissions by 2050 and mitigates climate change	<ul style="list-style-type: none"> <li>As demonstrated in the accompanying ESD Report at Appendix 11, the proposal implements a variety of methods to ensure best practice with respect to ESD principles. This is achieved through utilisation of low carbon materials and carefully selected fittings to minimise water and electricity use, among other initiatives.</li> </ul>

## North District Plan

The *North District Plan* (District Plan) was prepared by the Greater Sydney Commission in March 2018. It seeks to manage growth in the context of economic,

social and environmental matters in the North district. It provides the district level framework to implement the goals and directions outlined in the Region Plan.

In particular, the proposed development will address the following planning priorities:

Planning priority	Explanation
Planning Priority N3: Providing services and social infrastructure to meet people's changing needs	<ul style="list-style-type: none"> <li>The proposed development will provide on-site facilities and services for future residents, as well as providing seniors housing opportunities on a site with high accessibility to transport, health, retail and other services.</li> </ul>
Planning Priority N5: Providing housing supply, choice and affordability, with access to jobs, services and public transport.	<ul style="list-style-type: none"> <li>The proposal seeks to develop a seniors housing facility which is close to established health and retail services, and near bus routes connecting the development to the hubs of Dee Why and Chatswood. It will also provide additional non-residential floorspace on the site which will enhance accessibility to these services.</li> </ul>
Planning Priority N6: Creating and renewing great places and local centres, and respecting the District's heritage	<ul style="list-style-type: none"> <li>The proposal provides the opportunity for a health-focused urban renewal of the locality which provides high quality, sustainable and supportive housing and facilities for seniors.</li> <li>The site does not contain or is in close proximity to any heritage items.</li> </ul>
Planning Priority N9: Growing and investing in health and education precincts	<ul style="list-style-type: none"> <li>The site is located within the Frenchs Forest Health and Education Precinct and will assist in the continuing transition of the locality from a business park with limited uses into a higher amenity and vibrant precinct which accommodates seniors housing and opportunities for higher order employment.</li> </ul>

In addition to meeting the above priorities, it is noted that the North District Plan identifies the following key principle for business parks:

*“Not all centres will start as retail centres. Creating jobs and providing services to local communities can be initiated within business parks. However, the built form of these business parks is critical – that is, they need to be developed, from the outset, as urban places which can transition into higher amenity and vibrant places while maintaining their main role as an employment precinct. Councils’ retail and employment strategies should provide guidance on the transition of business parks into mixed employment precincts including, where appropriate, ancillary residential developments to support the business park.”*

The proposed development reflects this transitioning nature to allow for a mix of uses at the site which would not only support the broader business park, but also the future nearby Frenchs Forest Town Centre.



## Northern Beaches Local Strategic Planning Statement

The *Northern Beaches Local Strategic Planning Statement* was finalised and published on the NSW Planning Portal in March 2020. It sets out a 20-year plan on the Council's land use vision and planning priorities for the local government area.

The proposal is consistent with the Local Strategic Planning Statement, in particular the following actions:

- Priority 5: *Greener urban environment* - the proposal will provide for a comprehensive landscaping scheme which will significantly increase the canopy cover on the site and assists in increasing vegetation and deep soil provision within the site.
- Priority 9: *Infrastructure delivered with employment and housing growth* - the development will provide housing nearby the Northern Beaches Hospital, established public transport routes and retail services.
- Priority 11: *Community facilities and services that meet changing community needs* - the proposal addresses the ageing population within the Northern Beaches LGA, by providing a seniors housing development with a range of related land uses.
- Priority 12: *An inclusive, healthy, safe and socially connected community* - the proposal provides seniors housing in a location that is within a health and education precinct, which is well-served by health, retail and other services and is adjacent to a bus stop located adjoining the northern boundary of the site. The provision of communal open space, recreational and retail and health services on the site as part of the development will further promote opportunities for development that is inclusive, healthy, safe and socially connected.
- Priority 15: *Housing supply, choice and affordability in the right locations* - The development will improve housing supply and diversity through the provision of approximately 350 ILUs, with a range of 1, 2 and 3 bedroom ILUs. Further, 5% of all ILU GFA will be provided as affordable seniors housing units. The site is suitable for this type of development given its zoning, lack of constraints, proximity to existing seniors housing developments and access to transport, health and retail services.
- Priority 16: *Access to quality social housing and affordable housing* - The development will provide 5% of total ILU GFA as affordable seniors housing units, to be operated by a Community Housing provider for a minimum of 15 years.
- Priority 23: *Frenchs Forest as a sustainable health and education precinct* - the development is consistent with the locality's designation as a health and education precinct, by supporting the transition of the locality into a higher amenity, mixed use precinct, which co-locates seniors housing with major health infrastructure.

## Northern Beaches Community Strategic Plan

The *Community Strategic Plan* has a broader focus than the Local Strategic Planning Statement as it addresses long term social, environmental and economic goals for the community.

The proposal is consistent with the Community Strategic Plan as it will:

- Outcome: Housing, places and spaces - the proposal provides seniors housing in a location that is within a health and education precinct, which is well-served by health, retail and public transport services. The provision of communal open space, recreational and retail and health services on the site as part of the development will further promote opportunities for development that is inclusive, healthy, safe and socially connected.
- Outcome: Vibrant local economy - The development supports State housing strategies by expanding the supply of diverse seniors housing, whilst also providing opportunities for higher order job types and the potential to enhance the broader economic value of the Frenchs Forest business park by improving amenity and providing small, modern, flexible workspaces. It will also new higher order employment opportunities, industry diversification, and compatibility with

### **Northern Beaches Local Housing Strategy**

The *Northern Beaches Local Housing Strategy* was finalised in December 2021 and outlines the housing needs and objectives to be achieved over the next 15 years. The Housing Strategy identifies the need for 12,000 new dwellings by 2036.

The proposed development will align with the objectives of the plan by providing a higher density seniors housing development within the Frenchs Forest precinct, which is identified by the strategy as a locality with potential for additional housing. The proposal will consist of a diverse range of housing types, including affordable housing ILUs.

### **Northern Beaches Hospital Precinct Structure Plan**

The *Northern Beaches Hospital Precinct Structure Plan* (Structure Plan) is intended to guide future development around the new Northern Beaches Hospital over the next 20-30 years.

The Structure Plan aims to create a sustainable future for the repositioning of Frenchs Forest into a Strategic Centre and is aligned with *A Plan for Growing Sydney*.

The Structure Plan demonstrates the precinct's ability to reach its full potential as a Strategic Centre and its capacity to evolve over time to include a greater mix of residential, retail and service uses.

The Structure Plan identifies the subject site as land for jobs growth. The Structure Plan states that the Frenchs Forest Business Park is expected to grow and mature under its current zoning to support the new hospital and deepen the locality's employment base. This supports the notion of the transition of the Business Park to be a dynamic place with higher amenity and vibrancy whilst maintaining their main role as an employment precinct which offers higher order jobs to support the Health and Education precinct.

Whilst the proposal is principally for residential development, this is consistent with the provisions of the Housing SEPP, which specifically permits seniors housing on the site, and the Region and District Plans, which identify the site as part of a health and education precinct to undergo transition with a greater diversity of land uses, including

residential. The proposal also supports ongoing employment on the site providing supporting employment generating uses across a total 30,500m<sup>2</sup> of floor area. The EIA identifies that the proposal would support up to 465 direct job-years and 1,253 indirect job-years during construction.

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## Environmental Planning and Assessment Act

Development under the Act must have regard to its objects as set out under Section 1.3. The proposed development is considered consistent with the objects of the Act, as outlined in the table below.

Consideration	Relevance	EIS ref
Section 1.3: Objects of the Act		
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	Proposal promotes the social and economic welfare of the community as it will significantly contribute to housing supply and affordability, diversity in a well-located site close to transport, health, retail and other services. It will specifically provide opportunities for seniors to age in place and meet the demands for this type of housing arising from the ageing population of the Northern Beaches LGA. It will also contribute to the local economy through employment creation throughout construction and operation.	Section 7 Appendix 6 Appendix 22
to facilitate ecologically sustainable development by integrating relevant economic, environmental and social considerations in decision-making about environmental planning and assessment	This EIS provides information on the relevant economic, environmental and social impacts of the proposed development to enable the consent authority to undertake a thorough environmental assessment and assist in its decision-making on the application.	Section 6.14 Section 7 Appendix 11
to promote the orderly and economic use and development of land	The development promotes the orderly and economic use of the land by providing seniors housing, in accordance with the provisions of the Housing SEPP, as well as complementary employment generating uses which are consistent with the objectives of the SP4 zone. It is also noted that the proposal seeks to develop a large land holding which is in single land ownership which facilitates orderly development of the site.	Section 7 Appendix 4 Appendix 6
to promote the delivery and maintenance of affordable housing	The proposal provides for 5% of the total residential ILU GFA of the concept application as affordable housing.	Section 3



Consideration	Relevance	EIS ref
to protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats	The proposal retains the majority of the existing vegetation at the site and does not result in impacts to habitat of any threatened species as further detailed in the accompanying BDAR.	Section 6.3 Section 6.11 Appendix 10 Appendix 13
to promote the sustainable management of built and cultural heritage (including Aboriginal cultural heritage)	The proposal has assessed both Aboriginal and European Heritage within and surrounding the site. The accompanying ACHAR and SoHI demonstrate the site has no heritage value and will not have any impact on any surrounding heritage values.	Section 6.16 Appendix 20 Appendix 21
to promote good design and amenity of the built environment	The proposal is accompanied by a Design Report which details the rationale for the built form outcome of the site and addresses the Design Principles for seniors housing in the Housing SEPP. The report demonstrates that the buildings have been designed with the respect to the constraints and context of the site and reflects contemporary seniors housing design. The final design has addressed and been informed by comments received from the SDRP during two pre-lodgement meetings.	Section 6.1 Appendix 7
to promote the proper construction and maintenance of buildings, including the protection of the health and safety of their occupants	The development will be constructed in line with any conditions of approval issued by the consent authority and the relevant requirements that relate to health and safety, construction and maintenance.	N/A
to promote the sharing of the responsibility for environmental planning and assessment between the different levels of government in the State	This EIS is submitted to the Department of Planning, Housing and Infrastructure to enable its assessment as an SSD application.  It is expected that this document will be referred by the Department to other NSW Government agencies and Council for further assessment and comment.	N/A

Consideration	Relevance	EIS ref
to provide increased opportunity for community participation in environmental planning and assessment.	As part of Department of Planning, Housing and Infrastructure's assessment of the application, this EIS will made publicly available to the community, Council and any NSW Government agencies invited to provide a submission on the proposal. Any submissions received will be addressed by Platino as part of a 'Response to submissions report'.	N/A
Section 4.12(8)		
A development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf of the applicant in the form prescribed by the regulations.	This EIS has been prepared to accompany an SSD application and is in the form prescribed by the regulations.	N/A
Section 4.15		
the provisions of:		
any environmental planning instrument	The environmental planning instruments relevant to the site are addressed at Section 4 and within this appendix.	Section 4 Appendix 4
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)	There are no draft EPIs relevant to the site.  However, as noted in Section 4.3 of this EIS, Northern Beaches Council is currently preparing a draft Northern Beaches LEP which is yet to achieve Gateway determination from DPHI. Given this has not been subject to public consultation, it does not have any statutory weight.	Section 4
any development control plan	The Warringah Development Control Plan (DCP) is addressed within this appendix.	Appendix 4
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	There is no planning agreement relevant to the proposal.	N/A

Consideration	Relevance	EIS ref
the regulations (to the extent that they prescribe matters for the purposes of this paragraph),	The Environmental Planning and Assessment Regulation is addressed at Section 4.	Section 4
Repealed	n/a	
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	The likely impacts of the development, including environmental impacts on the natural and built environments, social and economic impacts are addressed at Section 6.	Section 6
c) the suitability of the site for the development	The suitability of the site for the development is considered at Section 2 and Section 6.	Section 2 Section 6
d) any submissions made in accordance with this Act or the regulations	Any submissions received on the application will be considered and addressed as part of a 'Response to submission report'.	N/A
e) the public interest.	The development is in the public interest as detailed in Sections 2 and 7.	Section 2 Section 7

## Environmental Planning and Assessment Regulation 2021

This EIS has been prepared in line with form and content requirements of Section 192 of the *Environmental Planning and Assessment Regulation 2021*. An overview of how the requirements of the Regulation have been satisfied is included in the table below.

Consideration	Relevance	EIS ref
Section 190		
Form of environmental impact statement	The EIS has been prepared in accordance with this section including consideration of the State Significant Development Guidelines.	All
Section 192		
Content of an environmental impact statement	The EIS includes all content required under this section.	All

## Biodiversity Conservation Act 2016

Consideration	Relevance	Complies	EIS ref
Section 7.9			

Consideration	Relevance	Complies	EIS ref
<p>This section applies to—  an application for development consent under Part 4 of the Environmental Planning and Assessment Act 1979 for State significant development, and  an application for approval under Division 5.2 of the Environmental Planning and Assessment Act 1979 to carry out State significant infrastructure.</p> <p>Any such application is to be accompanied by a biodiversity development assessment report unless the Planning Agency Head and the Environment Agency Head determine that the proposed development is not likely to have any significant impact on biodiversity values.</p> <p>The environmental impact statement that accompanies any such application is to include the biodiversity assessment required by the environmental assessment requirements of the Planning Agency Head under the Environmental Planning and Assessment Act 1979.</p>	<p>A Biodiversity Development Assessment Report (BDAR) has been prepared and included as part of this EIS. The BDAR has been prepared with respect to the biodiversity values land at the site and confirms that the site does not contain any threatened ecological communities (TECs). It also confirms that the existing plant community type (PCT) is not a diagnostic species and no offsets or credits are required to facilitate the removal of certain PCTs.</p>	Yes	<p>Section 6.11</p> <p>Appendix 13</p>

## Contaminated Land Management Act 1997

Consideration	Relevance	EIS ref
This Act establishes a process for investigating and (where appropriate) remediating land where contamination poses a significant risk of harm to human health or the environment.	A Preliminary Site Investigation (PSI) has been provided as part of this EIS at Appendix 23. The PSI identifies areas of potential environmental concern within the site as a result of potential importation of uncontrolled fill, pesticide uses, vehicle parking, metal degradation, chemical storage, leaks from substation, current & former site activities, onsite migration, and current & former asbestos based building products. Any contaminants that may be present within the site were considered to be of low significance, however, it is recommended that a Detailed Site Investigation (DSI) be required as a condition of consent.	Section 6.10 Appendix 23

## State Environmental Planning Policy (Housing) 2021

The State Environmental Planning Policy (Housing) 2021 seeks to guide the delivery of the right number of homes in the right place and of the right type, to suit the changing needs of people living in NSW now and into the future.

The proposal will contribute to housing diversity within the Northern Beaches LGA through the provision of additional dwelling types including ILUs and a RCF. An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion
3. Diverse housing		
Part 5	Housing for Seniors or People with a Disability	Part 5 of Chapter 3 of the Housing SEPP applies to land zoned SP4 Enterprise under the Warringah Local Environmental Plan 2011. A full assessment against this part is provided in the table below.



Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
Division 1 Land to which Part applies		
79. This Part applies to land in the following zones— <i>SP4 Enterprise under the Warringah Local Environmental Plan 2011</i>	The site is zoned SP4 Enterprise under the WLEP 2011 and therefore, the provisions of this Part apply.	Yes
80. Land to which Part does not apply - this part does not apply to land prescribed under Schedule 3 which includes environmentally sensitive land.	The site is not identified as any land listed under Schedule 3. It is noted that the site contains areas of 'biodiversity values', however, this is not 'an area of outstanding biodiversity' as prescribed under Schedule 3.	Yes
81. Seniors housing is permitted with consent on land to which this Part applies, or on land on which development for the purposes of seniors housing is permitted under another environmental planning instrument.	As per the comment against Section 79 above, the site is zoned SP4 under the WLEP 2011 and therefore this Part of the Housing SEPP permits seniors housing with consent.	Yes
Division 3 Development Standards		
84. Development standards - General Development consent must not be granted for development to which this section applies unless— (a) the site area of the development is at least 1,000sqm, 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	The proposed site area of the Concept proposal is over 2 hectares, with the site area of the Stage 1 works being over 1.1 hectares.  The entire site area has a frontage to Skyline Place of approximately 120m. The Stage 1 works utilise the frontage to the cul-de-sac at Skyline Place for access. Stage 1 also has a boundary of approximately 98m to Warringah Road despite access not being provided at this frontage.  The site is not within a residential zone and, therefore, the building height provisions do not apply.	Yes

Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
<p>(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</p> <p>(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.</p> <p>(3) The servicing equipment must—</p> <p>(a) be fully integrated into the design of the roof or contained and suitably screened from view from public places, and</p> <p>(b) be limited to an area of no more than 20% of the surface area of the roof, and</p> <p>(c) not result in the building having a height of more than 11.5m.</p>	All servicing equipment has been designed to be integrated to the overall built form of the development.	
85. Development consent must not be granted for development for the purposes of a hostel or an independent living unit unless the hostel or independent living unit complies with the relevant standards specified in Schedule 4.	An assessment against Schedule 4 of the Housing SEPP is provided in the table below and demonstrates compliance with the relevant standards	Yes
<p>88. Restrictions on occupation of seniors housing -</p> <p>(1) Development permitted under this Part may be carried out for the accommodation of only the following—</p> <p>(a) seniors or people who have a disability,</p> <p>(b) people who live in the same household with seniors or people who have a disability,</p>	The proposal provides housing for seniors in the form of ILUs and a RCF. A restriction can be made on Title for the occupation of the development by those listed under this Section.	Yes

Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
<p>(c) staff employed to assist in the administration and provision of services to housing provided under this Part.</p> <p>(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</p>		
<p>89. Use of ground floor of seniors housing in business zones</p> <p>(1) This section applies to a building used for the purposes of seniors housing on land in a business zone.</p> <p>(2) Development consent must not be granted for development under this Part unless the part of the ground floor of the building that fronts a street will not be used for residential purposes.</p> <p>(3) Subsection (2) does not apply to a part of a building that—</p> <p>(a) faces a service lane that does not require active street frontages, or</p> <p>(b) is used for 1 or more of the following purposes—</p> <p>(i) a lobby for a residential, serviced apartment, hotel or tenanted component of the building,</p> <p>(ii) access for fire services,</p> <p>(iii) vehicular access.</p>	<p>As per Chapter 1, Section 4 - Interpretation - general of the SEPP, subsection 3 states:</p> <p><i>A reference in this Policy to a business zone is taken, on and from 26 April 2023, to include a reference to Zones E1, E2, E3, MU1 and SP5.</i></p> <p>The site is located on land zoned SP4 and is therefore not a business zone as described above. The provisions of this section therefore do not apply.</p> <p>Notwithstanding, both the concept application and Stage 1 DA include ground-floor non-residential uses at the site's frontages to Skyline Place.</p>	Yes
<p>90. Subdivision</p> <p>(1) Development consent may be granted for the subdivision of land on which development has been carried out under this Part.</p>	<p>The proposed development does not seek approval for any subdivision.</p>	N/A

Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
(2) Development consent must not be granted for the subdivision of a building resulting from development carried out under this Part on land in Zone E2 Commercial Centre or Zone B3 Commercial Core.		
<p>91. Fire sprinkler systems in residential care facilities</p> <p>(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.</p> <p>(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.</p>	The proposed RCF will make provision for a fire sprinkler system. This is addressed in the report at Appendix 38.	Yes
Division 4 Site-related requirements		
<p>93. Location and access to facilities and services— independent living units</p> <p>(1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services—</p> <p>(a) by a transport service that complies with subsection (2), or</p> <p>(b) on-site.</p> <p>(2) The transport service must—</p> <p>(a) take the residents to a place that has adequate access to facilities and services, and</p> <p>(b) for development on land in the Eastern Harbour City, Central River City, Western Parkland City or Central Coast City—</p>	<p>The residents of the proposed development will have access to shops, bank service providers and other retail and commercial services and a general medical practitioner at Forestway Shopping Centre via the 280 bus service along Frenchs Forest Road. Other available routes along Frenchs Forest Road include:</p> <ul style="list-style-type: none"> <li>• Bus route 141 operates between Austlink and Manly via Balgowlah, Seaforth, Northern Beaches Hospital, Frenchs Forest, Glenrose Shopping Centre and Belrose, 7 days per week.</li> <li>• Bus route 160X operates express services between Chatswood and Dee Why via Frenchs Forest, 7 days per week.</li> </ul>	Yes

Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
<p>(i) not be an on-demand booking service for the transport of passengers for a fare, and</p> <p>(ii) be available both to and from the site at least once between 8am and 12pm each day and at least once between 12pm and 6pm each day, and</p> <p>(c) for development on other land—be available both to and from the site during daylight hours at least once each weekday.</p> <p>(3) For the purposes of subsections (1) and (2), access is adequate if—</p> <p>(a) the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and</p> <p>(b) the distance is accessible by means of a suitable access pathway, and</p> <p>(c) the gradient along the pathway complies with subsection (4)(c).</p> <p>(4) In subsection (3)—</p> <p>(a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and</p> <p>(b) the distance is to be measured by reference to the length of the pathway, and</p> <p>(c) the overall average gradient must be not more than 1:14 and the gradients along the pathway must be not more than—</p> <p>(i) 1:12 for a maximum length of 15m at a time, or</p> <p>(ii) 1:10 for a maximum length of 5m at a time, or</p>	<ul style="list-style-type: none"> <li>• Bus route 166 operates between Frenchs Forest and Manly via Dee Why Beach, 7 days per week.</li> <li>• Bus route 193 operates between Austlink and Warringah Mall via Brookvale, Narrabeena, Beacon Hill, Northern Beaches Hospital, Frenchs Forest and Belrose, 7 days per week.</li> <li>• Bus route 280 operates between Chatswood and Warringah Mall via Roseville, Forestville, Frenchs Forest and Allambie, 7 days per week.</li> </ul> <p>The above routes are accessible via public pathways through the approved developments at Nos 5 and 7 Skyline Place which comply with distance routes and gradients so residents can easily and safely access bus services.</p> <p>In the long term, as shown in the Concept Plan, access to Frenchs Forest Road will be provided through No. 1 Skyline Place which will further improve pedestrian connections provided through the site to bus services on Frenchs Forest Road.</p> <p>Small scale retail and commercial services will be provided within the subject site, the adjoining approved developments at Nos. 5 and 7 Skyline Place, Skyline Shops and within the future Frenchs Forest Town Centre.</p>	

Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
<p>(iii) 1:8 for a maximum length of 1.5m at a time.</p> <p>(5) In this section— facilities and services means—</p> <p>(a) shops and other retail and commercial services that residents may reasonably require, and</p> <p>(b) community services and recreation facilities, and</p> <p>(c) the practice of a general medical practitioner.</p>		
<p>94. Location and access to facilities and services—residential care facilities</p> <p>(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—</p> <p>(a) on-site, or</p> <p>(b) by a transport service other than a passenger service.</p>	<p>The provision of facilities and services to future residents of the RCF will be made on site.</p> <p>Particular services, including access to a General Practitioner, will be provided in house with visiting GPs to residents included as part of the future operator's care.</p> <p>Shops and other community services will form part of the future non-residential employment generating uses in the development, across the proposed 546m<sup>2</sup> of floor area for these uses.</p>	Yes
<p>95. Water and Sewer</p> <p>(1) A consent authority must not consent to development under this Part unless the consent authority is satisfied the seniors housing will—</p> <p>(a) be connected to a reticulated water system, and</p> <p>(b) have adequate facilities for the removal or disposal of sewage.</p> <p>(2) If the water and sewerage services will be provided by a person other than the consent authority, the consent authority—</p>	<p>As detailed in the Infrastructure Requirements and Staging Plan at Appendix 36, the site can be readily connected to available utility services, including water and sewer, with existing services within or adjacent to the site.</p>	Yes



Chapter 3 Diverse Housing   Part 5 Housing for Seniors and People with a Disability	Comment	Complies
<p>(a) must consider the suitability of the site in relation to the availability of reticulated water and sewerage infrastructure, or</p> <p>(b) if reticulated services are not available—must satisfy the responsible authority that the provision of water and sewerage infrastructure, including environmental and operational considerations, is satisfactory for the development.</p>		
<p>96. Bush fire prone land</p> <p>(1) A consent authority must not consent to development under this Part on relevant bush fire prone land unless the consent authority is satisfied the development complies with the requirements of Planning for Bushfire Protection.</p>	<p>The Bushfire Assessment provided at Appendix 23 demonstrates that the site is not identified as bushfire prone land.</p>	Yes
Division 5 Design Requirements		
<p>97 Design of seniors housing</p> <p>(1) In determining a development application for development for the purposes of seniors housing, a consent authority must consider the <i>Seniors Housing Design Guide</i>, published by the Department in December 2023.</p> <p>(2) Development consent must not be granted to development for the purposes of seniors housing unless the consent authority is satisfied the design of the seniors housing demonstrates that adequate consideration has been given to the design principles for seniors housing set out in Schedule 8.</p>	<p>A comprehensive assessment against the <i>Seniors Housing Design Guide</i> has been provided within the Design Report at Appendix 7.</p> <p>The assessment finds that the proposal has been designed with consideration to all design principles for independent living units, high density independent living, and residential care facilities. Specifically, the Design Report assesses the principle under Sections 12, 13 and 16 of the Guideline as they relate to the development to demonstrate that the principles have been adequately implemented into the design of the development.</p>	Yes

Housing SEPP Schedule 4 *Standards concerning accessibility and usability for hostels and independent living units* assessment

Chapter/ Section	Consideration	Discussion	Complies
Part 1 - Standards applying to hostels and independent living units			
2	Siting standards	The whole site has a gradient greater than 1:10. Notwithstanding, communal areas are all wheelchair accessible.	Yes
3	Letterboxes	Letterboxes are provided in a dedicated mailroom at ground floor, adjacent to the main entry lobby in Building A. The mailroom is wheelchair accessible and will provide at least 20% of the letterboxes at a height of more than 600mm and less than 1,200mm above ground level.	Yes
4	Car parking	Provision of parking meets minimum dimension requirements and relevant <i>Building Code of Australia</i> and Australian Standards requirements.	Yes
5	Accessible entry	All dwelling entries and circulation areas comply with relevant Australian Standards.	Yes
6	Interiors	Internal circulation area comply with the requirements of this section.	Yes
7	Bedroom	At least one bedroom in each dwelling is capable of accommodating a queen bed and a wardrobe, with appropriate circulation spaces to meet the requirements of this section.	Yes
8	Bathroom	All ILUs are one level, therefore bathrooms are on the entry level of the dwelling. Each bathroom provides for the requirements of this section.	Yes

Chapter/ Section	Consideration	Discussion	Complies
9	Toilet	As above, all ILUs are one level so a toilet is provided at the entry level of each dwelling. Each toilet provides for the requirements of this section.	Yes
10	Surfaces of balconies and external paved areas	All balconies and external paved areas have surfaces that are slip resistant and comply with relevant Australian Standards and requirements of the <i>Building Code of Australia</i> .	Yes
11	Door hardware	All door handles provided will comply with relevant Australian Standards.	Yes
12	Switches and power points	All switches and power points provided will comply with relevant Australian Standards.	Yes
13	Private passenger lifts	No private passenger lifts are provided within individual dwellings.	N/A
Part 2 - Additional standards for independent living units			
14	Application of standards in this part	This section applies as the proposal includes the provision of ILUs.	Yes
15	Bedroom	All bedrooms in each dwelling are provided on the same level as the entry to the dwelling.	Yes
16	Living room	All dwellings are single level and therefore living rooms are located on the same level as the entry of the dwelling. All living rooms have circulation areas clear of all fixtures and with a diameter of at least 2.25m.  Each living room will be provided with a telecommunications or data outlet adjacent to a general power outlet.	Yes

Chapter/ Section	Consideration	Discussion	Complies
17	Main area of private open space	All dwellings are single level and therefore areas of private open space are on the same level as entries to dwellings.	Yes
18	Kitchen	All dwellings are single level and therefore kitchens are on the same level as entries to dwellings. All kitchens meet minimum circulation area requirements and will be provided with required fittings under this section.	Yes
19	Laundry	All dwellings are single level and therefore laundries are on the same level as entries to dwellings.	Yes
20	Linen storage	All dwellings are provided with linen cupboards exceeding minimum dimensions.	Yes
21	Lift access in multi-storey buildings	All buildings are provided with lift access which complies with relevant requirements of the ADG for apartments on a lift core.	Yes
22	Garbage and recycling	Garbage chutes are provided on each level to allow for ease of disposal of garbage and recycling.	Yes

#### Housing SEPP Chapter 4 *Design of residential apartment development*

Chapter 4 of the Housing SEPP seeks to improve the design quality of residential developments and encourage innovative design. The Apartment Design Guide (ADG) is closely linked to the objectives of the Housing SEPP and sets out best practice design principles for residential developments.

This EIS and supporting technical documentation considers the quality of future residential amenity as part of its assessment of the application.

The provisions of Chapter 4 do not strictly apply to this development as the proposal is development for the purposes of seniors housing which is not a type of development defined under the chapter. Despite this, the Applicant has considered the design objectives and principles within the Housing SEPP and the ADG. The Design Report detailing the consideration of the 9 Design Quality Principles of Chapter 4 and consideration of the ADG is provided in Appendix 7.

The assessment demonstrates that the proposal is consistent with Chapter 4 of the Housing SEPP and the ADG and provides for a high level of amenity. In particular, the proposed development achieves a very high level of solar access and cross ventilation, far exceeding the ADG recommendations.

### State Environmental Planning Policy (Planning Systems) 2021

The *State Environmental Planning Policy (Planning) 2021* seeks to identify development that is State significant development.

An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
Section 2.6	Declaration of State significant development: section 4.36	The proposal is declared SSD under Schedule 1(28) of the Planning Systems SEPP as the development has an estimated development cost of more than \$30 million for the purposes of seniors housing in the Greater Sydney region, including the provision of an RCF, and does not propose any prohibited uses.	Section 4 Appendix 4

### State Environmental Planning Policy (Resilience and Hazards) 2021

The *State Environmental Planning Policy (Resilience and Hazards) 2021* seeks to reduce risk and build resilience in the face of natural hazards as well as development-related hazards. An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
4. Remediation of land			
Section 4.6	Contamination and remediation to be considered in determining development application	Site contamination has been considered through the preparation of a Preliminary Site Investigation (PSI). These documents confirm that the site can be made readily suitable for the proposed seniors housing development.	Section 6.10 Appendix 18

### State Environmental Planning Policy (Sustainable Building) 2022

The *State Environmental Planning Policy (Sustainable Building) 2022* (Sustainable Buildings SEPP) encourages the design and delivery of more sustainable buildings

across NSW. It sets sustainability standards for residential and non-residential development and starts the process of measuring and reporting on the embodied emissions of construction materials.

Sustainability commitments and objectives have been incorporated into the design of the proposed development to achieve a high level of energy efficiency and sustainability.

Specific design elements have been integrated in the development to ensure the building embodies best practice sustainable design.

Chapter/ Section	Consideration	Discussion	EIS ref
Section 2.1	Standards for BASIX development and BASIX optional development	This EIS includes an Ecologically Sustainable Development Report (ESD Report) which demonstrates how the development will minimise waste, reduce demand for electricity and water, and utilise renewable energy. The Architectural Plans are also supported by a BASIX Certificate.	Section 6.14 Appendix 11 Appendix 29

## State Environmental Planning Policy (Transport and Infrastructure) 2021

The *State Environmental Planning Policy (Transport and Infrastructure) 2021* seeks to guide the provision of well-designed and located infrastructure including transport. An assessment of the relevant provisions is detailed below.

Chapter/ Section	Consideration	Discussion	EIS ref
2. Infrastructure			
Section 2.119	Section 2.119 stipulates that the consent authority must not grant consent for residential development adjacent to a road corridor with an annual average daily traffic volume of more than 20,000 vehicles unless appropriate noise mitigation measures will be taken that provide for an acceptable acoustic environment.	The proposal has been accompanied by a Noise and Vibration Impact Assessment prepared by Acoustic Logic (at Appendix 14), which recommends appropriate noise mitigation treatments to ensure that future residential apartments achieve an acceptable noise environment and residential amenity.	Section 4.2 Appendix 6



Chapter/ Section	Consideration	Discussion	EIS ref
Section 2.121	Section 2.121 requires that development applications for certain traffic generating development, as set out in Schedule 3 of the policy, be referred to the Roads and Maritime Services (RMS) and that any submission from the RMS be considered prior to the determination of the application.	The Proposal seeks approval for seniors housing uses across Nos 1 and 3 Skyline Place. Although the proposal only seeks approval for Stage 1 works at No. 3 Skyline Place, which will provide 200 ILUs and 20 beds within the RCF, the total yield of the Concept proposal will exceed the 300 dwelling minimum to be classified as a traffic generating development. An assessment of the key traffic impacts is provided within this EIS.	Section 6.5 and Appendix 12

## Warringah Local Environmental Plan 2011

*Warringah Local Environmental Plan 2011* (WLEP 2011) applies to land within the former Warringah LGA, now part of the Northern Beaches LEP.

An assessment against the WLEP 2011 has been provided below for reference.

Clause	Consideration	Discussion	Complies
2.2 Zoning	SP4 Enterprise	<p>Clause 81 of the Housing SEPP permits seniors housing on the site, despite not being permissible in the SP4 zone under the LEP.</p> <p>Notwithstanding, the proposal is generally consistent with the objectives of the SP4 zone as outlined below:</p> <ul style="list-style-type: none"> <li>includes over 1,700m<sup>2</sup> of employment generating space across the concept proposal that will contribute to the amenity of both the future residents at the site and seniors living at adjoining developments at Nos. 5 and 7 Skyline Place</li> </ul>	Subject to provisions of the Housing SEPP

Clause	Consideration	Discussion	Complies
		<ul style="list-style-type: none"> <li>will generate employment opportunities both during construction and during the operation of the development</li> <li>will 465 direct job-years and 1,253 indirect job-years during construction and 72 new jobs during operation</li> <li>includes a high-quality landscaping scheme for the site which will enhance the shared open space courtyard provided as part of the development and will ensure that the existing landscaped character of the area is maintained</li> <li>minimises potential conflict between land uses through the siting of the development, design, generous setbacks, landscaping and glazing.</li> </ul>	
4.3 Height of buildings	N/A. No applicable height provision.	Maximum building height is 47.6 metres.	N/A
4.4 Floor space ratio	N/A. No applicable FSR provision.	The FSR proposed under the Stage 1 works is 2.66:1	N/A
5.10 Heritage conservation	N/A	There are no heritage items on the site and, the nearest heritage item is approximately 350m north north-east of the site	N/A
6.2 Earthworks	<ul style="list-style-type: none"> <li>Before granting development consent for earthworks, the consent authority must consider the following matters— <ul style="list-style-type: none"> <li>the likely disruption of, or any detrimental effect on, existing drainage patterns and soil stability in the locality,</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>A Geotechnical Assessment is provided at Appendix 28 and provides detail on the existing geotechnical conditions at the site, demonstrating the site is suitable for the proposed development.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>the effect of the proposed development on the likely future use or redevelopment of the land,</li> <li>the quality of the fill or the soil to be excavated, or both,</li> <li>the effect of the proposed development on the existing and likely amenity of adjoining properties,</li> <li>the source of any fill material and the destination of any excavated material,</li> <li>the likelihood of disturbing relics,</li> </ul> <p>the proximity to and potential for adverse impacts on any watercourse, drinking water catchment or environmentally sensitive area.</p>	<ul style="list-style-type: none"> <li>The site is not on land identified as flood prone, and the drainage patterns are unlikely to be significantly altered to have a negative impact on surrounding development.</li> <li>The land is not identified on the acid sulfate soils map and is considered unlikely to have any contaminants as detailed in the Acid Sulphate Soils Conditions Report at Appendix 26.</li> <li>It is unlikely that the proposal will impact any relics. The Statement of Heritage Impact at Appendix 21 states there is no evidence of significant heritage value at the site.</li> <li>The proposal is not in proximity to any major water courses.</li> </ul>	
5.21 Flood planning	N/A	Land is not identified as being at risk of flooding	N/A
6.1 Acid Sulfate Soils	N/A	The site is not identified as acid sulfate soils land and is not in proximity to any acid sulfate lands.	N/A

## Warringah Development Control Plan 2011

An assessment has also been provided against the Warringah DCP 2011 below. It is noted that as per the provisions of Section 2.10 of the Planning Systems SEPP, DCPs do not apply to State Significant Development, and assessment has been undertaken for reference only.

Clause	Consideration	Discussion	Complies
Part B - Built Form Controls			

Clause	Consideration	Discussion	Complies
B4 Site Coverage	The total building footprint(s) must not cover more than 33.3% of the site area	<p>Under the Stage 1 proposal, the proposed site coverage of the building footprints is 38.7%. Although this is a minor departure from this control, it is noted that the proposal continues to comply with the minimum landscaped area of 33.3%. The proposal therefore continues to meet the objectives of this section as:</p> <ul style="list-style-type: none"> <li>the development provides for significant provision of landscaping and enhancement of existing native vegetation through providing over 21% of the site as deep soil area (2,405m<sup>2</sup>);</li> <li>the proposal has been designed to minimise perceived bulk and scale; and</li> <li>the proposal has limited impervious areas and encourages natural drainage into the sub-surface.</li> </ul>	Acceptable on merit
B5 Side Boundary Setbacks	<ul style="list-style-type: none"> <li>The site is prescribed a Nil setback. Exceptions for land zoned B7:</li> </ul>	<ul style="list-style-type: none"> <li>Despite the control allowing nil setback, there are setbacks to all boundaries of a minimum 9m.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
B7 Front Boundary Setbacks	<ul style="list-style-type: none"> <li>Development is to maintain a minimum setback to road frontages.</li> <li>The front boundary setback area is to be landscaped and generally free of any structures, basements, carparking or site facilities other than driveways, letter boxes, garbage storage areas and fences.</li> <li>Where primary and secondary setbacks are specified, buildings and structures (such as carparks) are not to occupy more than 50% of the area between the primary and secondary setbacks. The area between the primary setback and the road</li> </ul>	<ul style="list-style-type: none"> <li>The identified front setback for the site is 10m. The proposed minimum setback to the boundary of No. 1 Skyline Place and the western boundary is 9m. The site located at a cul-de-sac and it will still fulfill the objectives of the front setback control by maintaining a sense of openness, through urban design principles throughout the development, particularly close to the street. This is further detailed in the accompanying Design Report at Appendix 7.</li> <li>Landscaping and pedestrian links are also provided within setbacks to soften any perceived bulk of the proposed buildings.</li> </ul>	Acceptable on merit
B10 Merit Assessment of Rear Boundary Setbacks	<ul style="list-style-type: none"> <li>Rear boundary setbacks will be determined on a merit basis and will have regard to: <ul style="list-style-type: none"> <li>streetscape;</li> <li>amenity of surrounding properties; and</li> <li>setbacks of neighbouring development</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>There is a rear setback of 9m to the eastern boundary of the site, which also includes a pedestrian pathway and landscaping to provide a landscaped buffer between the residential buildings and the neighbouring commercial buildings.</li> <li>The greenery within the setback achieves the objectives of enhancing the streetscape and providing amenity to surrounding properties.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
B14 Main Roads Setback	<ul style="list-style-type: none"> <li>Development is to be set back the minimum indicated on the DCP Map Main Road Setbacks. The measurement is to be made perpendicular to the property boundary to the main road.</li> <li>On land where the main roads setback is 30 metres, the front setback area: <ul style="list-style-type: none"> <li>a) must be densely landscaped using locally occurring species of canopy trees and shrubs; and</li> <li>b) no signs are to be erected in the 30 metre front setback area.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The proposal provides for a setback of 13.5m to 16.5m to its boundary with Warringah Road. There is a further setback of 15.5-16m between the boundary and the road reserve of Warringah Road (i.e. where the footpath starts).</li> <li>Accordingly, a setback to Warringah Road ranging from 29m to 32.5m is provided. This results in a minor non-compliance of 0.5m at the worst point.</li> <li>The minor non-compliance is justified as the proposal meets the objectives of this control by providing additional dense landscaping within this setback, utilising native species of canopy trees, and therefore enhancing the aesthetic quality of the main road.</li> </ul>	Yes
Part C Siting Factors			
C2 Traffic, access and safety	<p>Vehicular Access</p> <ul style="list-style-type: none"> <li>Applicants shall demonstrate that the location of vehicular and pedestrian access meets the objectives.</li> <li>Vehicle access is to be obtained from minor streets and lanes where available and practical.</li> </ul>	<ul style="list-style-type: none"> <li>The proposed development meets the objectives by being accessed from Skyline place at the cul-de-sac, which reduces the risk of interfering with other road users, pedestrians and cyclists.</li> <li>The proposal will utilise the existing vehicle crossover at 3 Skyline Place, with improvements as necessary.</li> <li>There will be designated areas for delivery vehicles and emergency vehicles which will not be publicly visible and will be of appropriate sizing.</li> </ul>	Yes



Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Vehicle crossing approvals on public roads are to be in accordance with Council's Vehicle Crossing Policy (Special Crossings) LAP-PL413 and Vehicle Access to Roadside Development LAP-PL 315.</li> <li>Vehicle crossing construction and design is to be in accordance with Council's Minor works specification.</li> </ul> <p>On-site loading and unloading</p> <ul style="list-style-type: none"> <li>Facilities for the loading and unloading of service, delivery and emergency vehicles are to be: appropriate to the size and nature of the development; screened from public view; and designed so that vehicles may enter and leave in a forward direction.</li> </ul>	<ul style="list-style-type: none"> <li>There is a dedicated turning bay located along the main driveway.</li> </ul>	
C3 Parking Facilities	<ul style="list-style-type: none"> <li>The following design principles shall be met: <ul style="list-style-type: none"> <li>Garage doors and carports are to be integrated into the house design and to not dominate the façade. Parking is to be located within buildings or on site.</li> <li>Laneways are to be used to provide rear access to carparking areas where possible;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The majority of the parking will be located in basement levels of the buildings, there are other ground level parking spaces available for accessible parking and pick up/drop off.</li> <li>A laneway connection to provide rear access is not feasible due to site constraints.</li> <li>Views of the street will not be obscured as a result of parking</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ Carparking is to be provided partly or fully underground for apartment buildings and other large scale developments;</li> <li>○ Parking is to be located so that views of the street from front windows are not obscured; and</li> <li>• Off street parking is to be provided within the property demonstrating that the following matters have been taken into account: <ul style="list-style-type: none"> <li>○ the land use;</li> <li>○ the hours of operation;</li> <li>○ the availability of public transport;</li> <li>○ the availability of alternative car parking; and</li> <li>○ the need for parking facilities for courier vehicles, delivery / service vehicles and bicycles.</li> </ul> </li> <li>• Carparking, other than for individual dwellings, shall: <ul style="list-style-type: none"> <li>○ Avoid the use of mechanical car stacking spaces;</li> <li>○ Not be readily apparent from public spaces;</li> <li>○ Provide safe and convenient pedestrian and traffic movement;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• There are 326 off street parking spaces within the basement provided across three levels, which is an appropriate amount of spaces for 200 ILUs and 20 RAC beds as detailed in the accompanying Traffic Report at Appendix 12.</li> <li>• Mechanical car stacking spaces are not being proposed.</li> <li>• Most parking spots are underground, and the above ground spaces will have signs for their designated purposes, ensuring they do not appear readily available to the public.</li> <li>• Traffic and pedestrian circulation spaces are shown in the Architectural and Landscape Plans (Appendices 5 &amp; 10), being separated from each other and incorporating design features to enhance the experience.</li> <li>• Driveway widths are sufficient for manoeuvring into individual spaces in both the basement car park and ground level spaces.</li> <li>• A turning bay on ground level provides an opportunity for all vehicles to enter and leave facing forwards.</li> <li>• Unobstructed visitor parking is provided in Basement 1.</li> </ul>	

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ Include adequate provision for manoeuvring and convenient access to individual spaces;</li> <li>○ Enable vehicles to enter and leave the site in a forward direction;</li> <li>○ Incorporate unobstructed access to visitor parking spaces;</li> <li>○ Be landscaped to shade parked vehicles, screen them from public view, assist in micro-climate management and create attractive and pleasant places;</li> <li>○ Provide on site detention of stormwater, where appropriate; and</li> <li>○ Minimum car parking dimensions are to be in accordance with AS/NZS 2890.1.</li> </ul> <p>• Carparking is to be provided in accordance with Appendix 1 which details the rate of car parking for various land uses. Where the carparking rate is not specified in Appendix 1 or the WLEP, carparking must be adequate for the development having regard to the objectives and requirements of this clause. The rates specified in the Roads and Traffic Authority's Guide to Traffic Generating Development should be used as a guide where relevant.</p>	<ul style="list-style-type: none"> <li>• There are existing trees around all proposed ground level parking spaces which are to be retained, which will provide shade. Additional plantings are also proposed as shown in the Landscape Plans at Appendix 10.</li> <li>• A 185 m<sup>3</sup> underground detention tank will be provided in the south-western corner of the development, below Building C.</li> <li>• Minimum car parking dimensions will be in accordance with relevant standards.</li> <li>• Proposed car parking has been provided in accordance with the Housing SEPP for the seniors housing component and in accordance with relevant rates for the employment generating uses.</li> <li>• It is noted that there will be sufficient parking for staff, customers and visitors.</li> <li>• Over 10% of the parking spaces are to be accessible.</li> </ul>	

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Adequate provision for staff, customer and courier parking, and parking and turning of vehicles with trailers must be provided if appropriate to the land use.</li> </ul> <p>Where appropriate, car parking which meets the needs of people with physical disabilities must be provided in accordance with the relevant Australian Standard.</p>		
C3(A) Bicycle Parking and End of Trip Facilities	<ul style="list-style-type: none"> <li>Bicycle parking facilities must be provided for new buildings and for alterations or additions to existing buildings. In the case of alterations or additions to existing buildings bicycle parking facilities are required for the additional floor area only.</li> <li>Bicycle parking shall be designed and constructed in accordance with Australian Standard AS 2890.3 – Bicycle Parking Facilities.</li> <li>Bicycle parking facilities shall be designed to be an integral part of the development and where visible from public places or streets, will complement the visual quality of the public domain.</li> </ul>	<ul style="list-style-type: none"> <li>A bicycle storage room is provided within the basement, with end of trip facilities co-located in an adjacent room.</li> <li>It is noted that the bicycle parking will be completed to the relevant standard.</li> <li>As the primary land use is for seniors housing, bicycle facilities are not expected to be highly utilised by residents.</li> <li>The bicycle storage room will provide sufficient bicycle parking spaces to service senior residents.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Bicycle parking shall be provided in accordance with the generation rates in the following table and is determined by adding requirements and rounding up: 1 per 2 independent living units and for all other types of development 1 per 15 beds. For visitors 1 per 12 ILUs and for all other types of development 1 per 30 beds.</li> </ul> <p>End of trip facilities must be provided for new buildings and for alterations or additions to existing buildings. In the case of alterations or additions to existing buildings end of trip facilities are required for the additional floor area only. End of trip facilities are not required for schools, wholly residential buildings or residential components of mixed use buildings.</p>		
C4 Stormwater	<p>Stormwater runoff must not cause downstream flooding and must have minimal environmental impact on any receiving stormwater infrastructure, watercourse, stream, lagoon, lake and waterway or the like. The stormwater drainage systems for all developments are to be designed, installed and maintained in accordance with Council's Water Management Policy. Exceptions Refer to Council's Water Management Policy for exceptions.</p>	<ul style="list-style-type: none"> <li>The site is not located in a flood prone area.</li> <li>Any flooding that may occur is unlikely to be damaging to a waterways.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
C7 Excavation and Landfill	<p>1. All landfill must be clean and not contain any materials that are contaminated and must comply with the relevant legislation.</p> <p>2. Excavation and landfill works must not result in any adverse impact on adjoining land.</p> <p>3. Excavated and landfill areas shall be constructed to ensure the geological stability of the work.</p> <p>4. Excavation and landfill shall not create siltation or pollution of waterways and drainage lines, or degrade or destroy the natural environment.</p> <p>5. Rehabilitation and revegetation techniques shall be applied to the fill.</p> <p>6. Where landfill is necessary, it is to be minimal and shall have no adverse effect on the visual and natural environment or adjoining and surrounding properties.</p>	<ul style="list-style-type: none"> <li>• The PSI in Appendix 18 indicates that there is a low risk of any risk to people and the environment.</li> <li>• The PSI recommends that a DSI is prepared and can be included as a condition of consent.</li> <li>• It is noted that measures will be in place to ensure there is no adverse impact on neighbouring sites during the construction phase.</li> <li>• The Geotechnical Report in Appendix 28 provides measures that will be implemented to ensure stability, including temporary batter slopes where appropriate.</li> <li>• The Geotechnical Report recommends further investigation of groundwater levels prior to commencement of bulk excavation to determine the likelihood of an impact on the natural environment.</li> </ul>	Yes
C8 Demolition and Construction	<p>1. All development that is, or includes, demolition and/or construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must be accompanied by a Waste Management Plan.</p> <ul style="list-style-type: none"> <li>• Removal of asbestos must be undertaken in accordance with the following:</li> </ul>	<ul style="list-style-type: none"> <li>• A Construction Waste Management Plan is included with the Construction Management Plan at Appendix 34.</li> <li>• All demolition and construction works will comply with all relevant standards.</li> <li>• The site will utilise the existing access point during the construction phase, accessed at the cul-de-sac of Skyline Place.</li> </ul>	Yes



Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ The relevant Australian Standard. Australian Standard AS 2601-2001 'Demolition of Structures' applied at the time the DCP was adopted.</li> <li>○ Code of Practice for the Safe Removal of Asbestos, 2nd Edition [NOHSC:2002(2005)], Australian Government, National Occupational Health and Safety Commission.</li> <li>● Initiatives to ensure that site impact is minimised include: <ul style="list-style-type: none"> <li>○ Restricting vehicles to one entry/ exit which is appropriately stabilised with aggregate or the like;</li> <li>○ Provision of a sediment control device at the access point to prevent sediment depositing on roads;</li> <li>○ Managing the number and frequency of vehicular movements to minimise impact on the neighbourhood;</li> <li>○ Minimising air pollution by watering, limiting site disturbance and landscaping at the end of the project;</li> </ul> </li> </ul>		

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ Locating drainage in close proximity to the built area to avoid excavation;</li> <li>○ Implementing methods to control stormwater and erosion during construction;</li> <li>○ Implement rehabilitation techniques to restore the site for future use; and</li> <li>○ Regularly check and maintain devices.</li> <li>○ Exceptions</li> </ul> <p>Reference should be made to Part G for additional, site specific requirements.</p>		
C9 Waste Management	1. All development that is, or includes, demolition and/or construction, must comply with the appropriate sections of the Waste Management Guidelines and all relevant Development Applications must be accompanied by a Waste Management Plan.	Construction waste will be managed in accordance with the Construction Management Plan at Appendix 34.	Yes
Part D Design			
D1 Landscaped Open Space and Bushland Setting	<p>The required minimum area of landscaped open space is 33.3%. To measure the area of landscaped open space:</p> <ul style="list-style-type: none"> <li>• Driveways, paved areas, roofed areas, tennis courts, car parking and stormwater structures, decks, etc, and any open space areas with a dimension of less than 2 metres are excluded from the calculation;</li> </ul>	<ul style="list-style-type: none"> <li>• There will be 3,964m<sup>2</sup> of landscaped area provided which is above the minimum 33.3% requirement (3,809.5m<sup>2</sup>)</li> <li>• The minimum soil depth will exceed 1m.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Landscaped open space must be at ground level (finished); and</li> <li>The minimum soil depth of land that can be included as landscaped open space is 1 metre.</li> </ul>		
D2 Private Open Space	<ul style="list-style-type: none"> <li>Residential development is to include private open space for each dwelling.</li> <li>The minimum area and dimensions of private open space are as follows: for a residential flat building a total of 10m<sup>2</sup> with minimum dimensions of 2.5 metres</li> <li>Private open space is to be directly accessible from a living area of a dwelling and be capable of serving as an extension of the dwelling for relaxation, dining, entertainment, recreation and children's play.</li> <li>Private open space is to be located and designed to ensure privacy of the occupants of adjacent buildings and occupants of the proposed development.</li> <li>Private open space shall not be located in the primary front building setback.</li> <li>Private open space is to be located to maximise solar access.</li> </ul>	<ul style="list-style-type: none"> <li>All apartments will have a balcony to provide private open space.</li> <li>All areas of private open space exceed the minimum dimensions and area.</li> <li>All private open spaces will be accessible via a living space and have the capability to serve a range of functions</li> <li>Private open spaces are not within the front setback.</li> <li>Majority of apartments have been designed to have north facing private open space where possible. In apartments where it is not possible, there are east or west facing private open spaces.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
D3 Noise	<ul style="list-style-type: none"> <li>Noise from combined operation of all mechanical plant and equipment must not generate noise levels that exceed the ambient background noise by more than 5dB(A) when measured in accordance with the NSW Industrial Noise Policy at the receiving boundary of residential and other noise sensitive land uses.</li> <li>Development near existing noise generating activities, such as industry and roads, is to be designed to mitigate the effect of that noise.</li> <li>Waste collection and delivery vehicles are not to operate in the vicinity of residential uses between 10pm and 6am.</li> <li>Where possible, locate noise sensitive rooms such as bedrooms and private open space away from noise sources. For example, locate kitchens or service areas closer to busy road frontages and bedrooms away from road frontages.</li> <li>Where possible, locate noise sources away from the bedroom areas of adjoining dwellings/properties to minimise impact.</li> </ul>	<ul style="list-style-type: none"> <li>The EIS is accompanied by a Noise and Vibration Impact Assessment at Appendix 14 which confirms compliance with the relevant standards.</li> <li>It is recommended that the noise from the mechanical plant is further assessed at the construction certificate stage of the process.</li> <li>The development will continue to use Council's waste collection, which will be collected according to Council's schedule.</li> </ul>	Yes
D6 Access to Sunlight Objectives	<ul style="list-style-type: none"> <li>Development should avoid unreasonable overshadowing any public open space.</li> </ul>	<ul style="list-style-type: none"> <li>It is noted that the proposal meets the requirements of the ADG in achieving 2 hours of solar access to 84% of proposed apartments.</li> </ul>	Acceptable on merit

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>At least 50% of the required area of private open space of each dwelling and at least 50% of the required area of private open space of adjoining dwellings are to receive a minimum of 3 hours of sunlight between 9am and 3pm on June 21.</li> </ul>	<ul style="list-style-type: none"> <li>Accordingly, it is expected that the adjoining areas of private open space would also receive a minimum 2 hours.</li> <li>Given the proposal meets the requirements of the ADG, this is considered an acceptable amenity outcome</li> </ul>	
D7 Views	<ul style="list-style-type: none"> <li>Development shall provide for the reasonable sharing of views.</li> <li>Assessment of applications will refer to the Planning Principle established by the Land and Environment Court in Tenacity Consulting v Warringah Council (2004) NSWLEC 140.</li> </ul>	<ul style="list-style-type: none"> <li>The development is not located in an area with any important views and will not impact on any views.</li> <li>Notwithstanding, a visual impact assessment is provided at Appendix 8 which demonstrates that the proposed development's siting at the top of a ridgeline does not impact on any views of surrounding development.</li> </ul>	Yes
D8 Privacy	<ul style="list-style-type: none"> <li>Building layout should be designed to optimise privacy for occupants of the development and occupants of adjoining properties.</li> <li>Orientate living areas, habitable rooms and windows to private open space areas or to the street to limit overlooking.</li> <li>The effective location of doors, windows and balconies to avoid overlooking is preferred to the use of screening devices, high sills or obscured glass.</li> </ul>	<ul style="list-style-type: none"> <li>As outlined in the CPTED report in Appendix 35, the development achieves CPTED principles to improve safety</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>The windows of one dwelling are to be located so they do not provide direct or close views (ie from less than 9 metres away) into the windows of other dwellings.</li> <li>Planter boxes, louvre screens, pergolas, balcony design and the like are to be used to screen a minimum of 50% of the principal private open space of a lower apartment from overlooking from an upper apartment.</li> </ul>		
D9 Building Bulk	<ul style="list-style-type: none"> <li>Side and rear setbacks are to be progressively increased as wall height increases.</li> <li>Large areas of continuous wall planes are to be avoided by varying building setbacks and using appropriate techniques to provide visual relief.</li> <li>On sloping land, the height and bulk of development (particularly on the downhill side) is to be minimised, and the need for cut and fill reduced by designs which minimise the building footprint and allow the building mass to step down the slope. In particular: <ul style="list-style-type: none"> <li>The amount of fill is not to exceed one metre in depth.</li> <li>Fill is not to spread beyond the footprint of the building.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>The side and rear setbacks are at an appropriate distance for residential amenity and the amenity of surrounding developments.</li> <li>Large areas of continuous wall planes are infrequently offset to reduce perceived bulk.</li> <li>Excavation will be required to facilitate the basement levels as detailed in the Geotechnical Assessment at Appendix 28.</li> <li>The building heights and scales are appropriate for the site conditions, as the site's topography does not pose a risk to the structural integrity of the development.</li> <li>The development uses a colour palette which is appropriate for the natural setting of the site, which will reduce perceived bulk.</li> </ul>	Yes



Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Excavation of the landform is to be minimised.</li> <li>Building height and scale needs to relate to topography and site conditions.</li> <li>Orientate development to address the street.</li> <li>Use colour, materials and surface treatment to reduce building bulk.</li> <li>Landscape plantings are to be provided to reduce the visual bulk of new building and works.</li> <li>Articulate walls to reduce building mass.</li> </ul>	<ul style="list-style-type: none"> <li>The site will have a significant area of landscaping, to allow for plantings which will grow to provide a sizeable canopy.</li> </ul>	
D10 Building Colours and Materials	<ul style="list-style-type: none"> <li>In highly visible areas, the visual impact of new development (including any structures required to retain land) is to be minimized through the use of appropriate colours and materials and landscaping.</li> <li>The colours and materials of development on sites adjoining, or in close proximity to, bushland areas, waterways or the beach must blend in to the natural landscape....</li> </ul>	<ul style="list-style-type: none"> <li>The Architectural Plans provide for a materials schedule which includes a colour scheme which matches the bushland setting of the site. Buildings have a range of brown, green and grey shades.</li> </ul>	Yes
D11 Roofs	<ul style="list-style-type: none"> <li>Lift overruns, plant and other mechanical equipment are not to detract from the appearance of roofs.</li> <li>Roofs should complement the roof pitch and forms of the existing buildings in the streetscape.</li> </ul>	<ul style="list-style-type: none"> <li>It is noted that mechanical features will not detract from the roof.</li> <li>The proposed building has a predominantly flat roof, and complements surrounding developments.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Articulate the roof with elements such as dormers, gables, balconies, verandahs and pergolas.</li> <li>Roofs shall incorporate eaves for shading.</li> <li>Roofing materials should not cause excessive glare and reflection.</li> <li>Service equipment, lift overruns, plant and other mechanical equipment on the roof shall be minimised by integrating as many services, etc as possible into the building.</li> </ul>	<ul style="list-style-type: none"> <li>The roof of the southern building has a communal open space and will provide features accordingly to make the space pleasant. Other rooftops will not have any features.</li> <li>The materials on the roof will not cause excessive glare.</li> </ul>	
D12 Glare and Reflection	<ul style="list-style-type: none"> <li>The overspill from artificial illumination or sun reflection is to be minimised by utilising one or more of the following: Selecting an appropriate lighting height that is practical and responds to the building and its neighbours; <ul style="list-style-type: none"> <li>Minimising the lit area of signage;</li> <li>Locating the light source away from adjoining properties or boundaries; and</li> <li>Directing light spill within the site.</li> </ul> </li> <li>Any glare from artificial illumination is to be minimised by utilising one or more of the following: <ul style="list-style-type: none"> <li>Indirect lighting;</li> <li>Controlling the level of illumination; and</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>All lighting within the site will be designed to minimise spill as much as possible. This will be determined at the detailed design phase post-approval.</li> <li>Materials and colours have been selected to not result in any unacceptable glare towards residents or neighbouring developments.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ Directing the light source away from view lines.</li> <li>• Sunlight reflectivity that may impact on surrounding properties is to be minimised by utilising one or more of the following: <ul style="list-style-type: none"> <li>○ Selecting materials for roofing, wall claddings and glazing that have less reflection eg medium to dark roof tones;</li> <li>○ Orienting reflective materials away from properties that may be impacted;</li> <li>○ Recessing glass into the façade;</li> <li>○ Utilising shading devices;</li> <li>○ Limiting the use of glazing on walls and glazed balustrades and avoiding the use of highly reflective glass; and</li> <li>○ Selecting windows and openings that have a vertical emphasis and are significantly less in proportion to solid massing in walls.</li> </ul> </li> </ul>		
D14 Site Facilities	<ul style="list-style-type: none"> <li>• Site facilities including garbage and recycling enclosures, mail boxes and clothes drying facilities are to be adequate and convenient for users and services and are to have minimal visual impact from public places. In particular:</li> </ul>	<ul style="list-style-type: none"> <li>• A waste holding bay is located on ground level in the north east of the site is located out of public view but maintains accessibility to residents and other users.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ Waste and recycling bin enclosures are to be durable, integrated with the building design and site landscaping, suitably screened from public places or streets and located for convenient access for collection;</li> <li>○ All dwellings which are required to have landscaped open space are to be provided with adequate open air clothes drying facilities which are suitably screened from public places or streets;</li> <li>○ Garbage areas are to be designed to avoid common problems such as smell, noise from collection vehicles and the visibility of containers;</li> <li>○ Landscaping is to be provided to reduce the impact of all garbage and recycling enclosures. They are to be located away from habitable rooms, bedrooms or living areas that may detract from the amenity of occupants; and</li> </ul>	<ul style="list-style-type: none"> <li>• All dwellings have a balcony or other landscaped open space with sufficient space for clothes drying and have some screening from Warringah Road because of existing and proposed vegetation.</li> <li>• Provision has been made for a mailroom, which is appropriate for the context of the proposal.</li> </ul>	

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ Mail boxes are to be incorporated into the front fence or landscaping design. They are to be easily accessible and clearly identifiable.</li> </ul>		
D18 Accessibility	<ul style="list-style-type: none"> <li>• The design is to achieve a barrier free environment with consideration given to the design of door handles and switches, entrances and corridors. Steep, rough and slippery surfaces, steps and stairs and narrow paths should be avoided.</li> <li>• There are to be continuous, independent and barrier-free access ways incorporated into the design of buildings.</li> <li>• Pathways are to be reasonably level with minimal cross fall and sufficient width, comfortable seating and slip- resistant floor surfaces.</li> <li>• Where there is a change of level from the footpath to commercial or industrial floor levels, ramps rather than steps should be incorporated.</li> <li>• There is to be effective signage and sufficient illumination for people with a disability.</li> <li>• Tactile ground surface indicators for the orientation of people with visual impairments are to be provided in accordance with the relevant Australian Standard.</li> </ul>	<ul style="list-style-type: none"> <li>• The development has been designed for seniors, ensuring accessibility and disability friendliness is at the forefront of the design.</li> <li>• The Design Report from Appendix 7 confirms that the development is designed for ageing, incorporating non-slip surfaces, minimising tripping hazards and putting special attention into areas of risk, including door thresholds and floor material changes.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Access for people with a disability is to be provided at the main entrance to the development.</li> <li>Development is to comply with Australian Standard AS1428.2. Note All applicants are reminded of their responsibilities under the Disability Discrimination Act 1992. The Residential Flat Design Code provides accessibility standards which are to be satisfied for residential flat building developments.</li> </ul>		
D20 Safety and Security	<ul style="list-style-type: none"> <li>For larger developments, a site management plan and formal risk assessment, including the consideration of the 'Crime Prevention through Environmental Design' principles may be required. This is relevant where, in Council's opinion, the proposed development would present a crime, safety or security risk. See Crime Prevention and Assessment of Development Applications – Guidelines under Section 79C of the Environmental Planning and Assessment Act 1979 prepared by the Department of Urban Affairs and Planning (now Department of Planning).</li> </ul>	<ul style="list-style-type: none"> <li>The CPTED Report in Appendix 35 confirms the design features to improve safety within the site and in the surrounding area.</li> </ul>	Yes



Clause	Consideration	Discussion	Complies
D21 Provision and Location of Utility Service	<ul style="list-style-type: none"> <li>If a proposed development will involve a need for them, utility services must be provided, including provision of the supply of water, gas, telecommunications and electricity and the satisfactory management of sewage and drainage.</li> <li>2. Service structures, plant and equipment are to be located below ground or be designed to be an integral part of the development and suitably screened from public places or streets.</li> <li>3. Where possible, underground utility services such as water, gas, telecommunications, electricity and gas are to be provided in a common trench. The main advantages for this are: <ul style="list-style-type: none"> <li>A reduction in the number of trenches required;</li> <li>An accurate location of services for maintenance;</li> <li>Minimising the conflict between services;</li> <li>Minimising land required and cost;</li> </ul> </li> <li>The location of utility services should take account of and minimise any impact on natural features such as bushland and natural watercourses.</li> </ul>	<ul style="list-style-type: none"> <li>The accompanying Water Management Plan details how the site can be readily connected to stormwater management systems.</li> <li>The application will be referred to the relevant electricity supplier to confirm the existing network has capacity for the proposal. Consideration will be given to any response made by the electricity supplying authority.</li> <li>The Geotechnical Assessment has undertaken reviews of the underground services and confirms there is available telecommunications and gas services within the property so that the future development can be readily connected.</li> <li>The Infrastructure Requirements and Staging Plan details how the site can be readily connected to available services at Appendix 36.</li> <li>The proposal will not have any impact on natural features such as bushland and natural watercourses.</li> <li>No above ground utilities are proposed.</li> <li>The Geotechnical Assessment confirms that a Sydney Water sewer line runs along the western boundary of the property. The proposal can therefore be connected.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>Where natural features are disturbed the soil profile should be restored and landscaping and tree planting should be sited and selected to minimise impact on services, including existing overhead cables.</li> <li>Where utilities are located above ground, screening devices should include materials that complement the streetscape, for example fencing and landscaping. The location of service structures such as electricity substations should be within the site area.</li> <li>Habitable buildings must be connected to Sydney Water's sewerage system where the density is one dwelling per 1050 square metres or greater.</li> <li>On land where the density is less than one dwelling per 1050 square metres, and where connection to Sydney Water is not possible, Council may consider the on-site disposal of effluent where the applicant can demonstrate that the proposed sewerage systems or works are able to operate over the long term without causing unreasonable adverse effects.</li> </ul>		
Part E The Natural Environment			

Clause	Consideration	Discussion	Complies
E1 Tree Development Applications (Tree DAs) are required for:	<ul style="list-style-type: none"> <li>Removal or cutting down of any tree over five (5) metres in height;</li> <li>Pruning of more than ten percent (10%) of a tree canopy.</li> <li>The removal of "Bushland".</li> <li>The applicant must demonstrate that any tree to be removed as part of a Tree DA meets one or more of the criteria of the Removal of Tree Test in Appendix 8 (WDCP) and the Tree Retention Assessment in Appendix 9 (WDCP). An arborist report may be required to satisfy this requirement.</li> </ul>	<ul style="list-style-type: none"> <li>An Arborist Report is provided at Appendix 9 and details that 16 trees are required to be removed as part of the proposal.</li> <li>The proposal retains the majority of trees within the site and makes provisions for more plantings as detailed in the accompanying Landscape Plans.</li> </ul>	Acceptable on merit
E10 Landslip Risk	<ul style="list-style-type: none"> <li>The applicant must demonstrate that: <ul style="list-style-type: none"> <li>The proposed development is justified in terms of geotechnical stability; and</li> <li>The proposed development will be carried out in accordance with good engineering practice.</li> </ul> </li> <li>Development must not cause detrimental impacts because of stormwater discharge from the land.</li> <li>Development must not cause detrimental impact on the existing subsurface flow conditions including those of other properties.</li> </ul> <p>To address Requirements 1 to 3:</p>	<ul style="list-style-type: none"> <li>The Geotechnical Report confirms that the development is justified in terms of geotechnical stability and recommends a temporary batter slopes where necessary to improve the stability further.</li> <li>The development is not considered likely to cause any detrimental impacts on stormwater, or subsurface flow conditions.</li> <li>The site is identified wholly as having a slope of less than 5 degrees. A Preliminary Site Investigation and Geotechnical Assessment have been prepared to address this.</li> </ul>	Yes

Clause	Consideration	Discussion	Complies
	<ul style="list-style-type: none"> <li>○ For land identified as being in Area A: Council may decide that a preliminary assessment of site conditions is required. If Council so decides, a preliminary assessment of site conditions must be prepared, in accordance with the Checklist for Council's assessment of site conditions (see Notes) by a suitably qualified geotechnical engineer/ engineering geologist. The preliminary assessment must be submitted to Council before the granting of any development consent.</li> </ul>		

## Appendix 5: Architectural Plans

## Appendix 6: Economic Impact Statement



## Appendix 7: Design Report

## Appendix 8: Visual Impact Assessment

## Appendix 9: Arboricultural Impact Assessment

## Appendix 10: Landscape Plans

## Appendix 11: Ecologically Sustainable Development Report

## Appendix 12: Transport and Accessibility Impact Assessment



## Appendix 13: Biodiversity Development Assessment Report

## Appendix 14: Noise and Vibration Impact Assessment

## Appendix 15: Salinity Conditions Report

## Appendix 16: Water Management Plan

## Appendix 17: Hazardous Materials Report

## Appendix 18: Preliminary Site Investigation



## Appendix 19: Operational Waste Management Plan

## Appendix 20: Aboriginal Cultural Heritage Assessment Report

## Appendix 21: Statement of Heritage Impact

## Appendix 22: Social Impact Assessment

## Appendix 23: Bushfire Assessment

## Appendix 24: Engagement Report

## Appendix 25: Estimated Development Cost Report



## Appendix 26: Acid Sulphate Soils Conditions Assessment

## Appendix 27: Environmental Wind Impact Study

## Appendix 28: Geotechnical Assessment

## Appendix 29: BASIX Certificate

## Appendix 30: Social Impact Assessment

## Appendix 31: Connecting with Country Report

## Appendix 32: Construction Traffic Management Plan



## Appendix 33: Green Travel Plan

## Appendix 34: Construction Management Plan

## **Appendix 35: Crime Prevention Through Environmental Design Report**

**Appendix 36: Infrastructure Requirements and Staging Report**

## Appendix 37: Access Statement

## Appendix 38: Access Report

## **Appendix 39: Surface Water and Groundwater Impact Assessment**