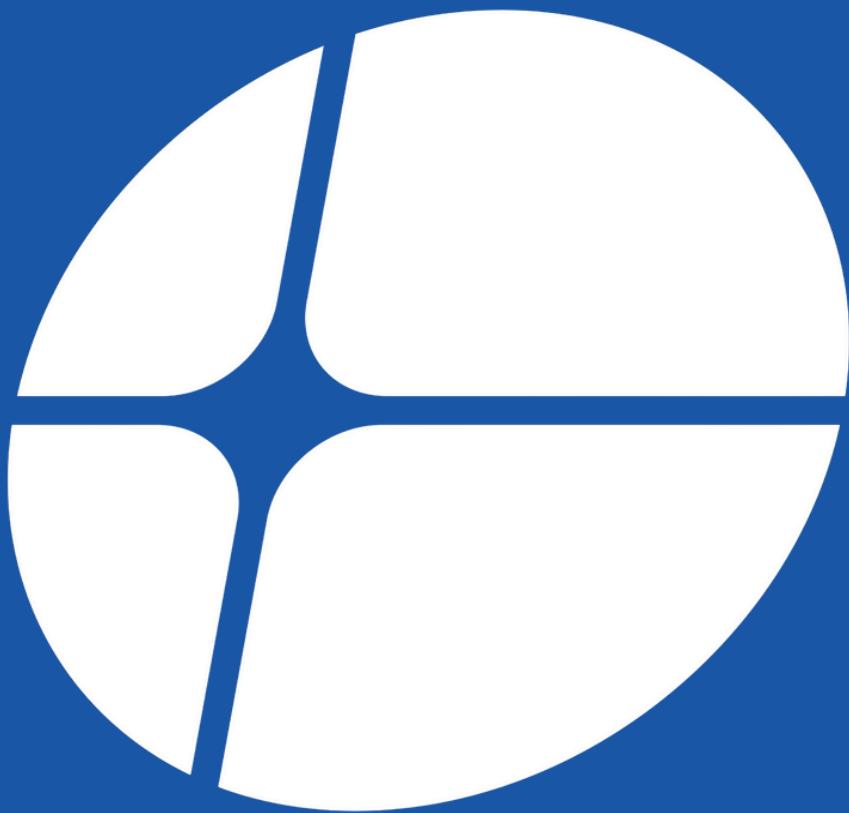


Submissions and Amendment Report

1 – 3 Skyline Place Seniors Housing
SSD – 69850712



Prepared for Platino Properties Pty Ltd

Submitted to DPHI

December 2025

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Table of Contents

1	Introduction	12
1.1	Proposed Development	12
1.2	Report Structure	13
2	Analysis of Submissions	15
2.1	Breakdown of submissions	15
2.2	Categorising issues	15
3	Actions taken since exhibition	17
3.1	Further engagement	17
3.2	Amendments to the project	17
3.2.1	Gross Floor Area – 1 Skyline Place	18
3.3	Further impact assessment	19
4	Response to submissions	20
4.1	Department Submission	21
4.2	Agency Submissions	36
4.3	Public Submissions	60
5	Updated project justification	74

Figures

Figure 1	Proposed massing (Source: Smith & Tzannes)	7
Figure 2	Proposed Massing, Proposed and 4-storey comparison (Source: Smith & Tzannes) ...	8
Figure 3	Proposed Built Form Building C (Source: Smith & Tzannes)	9

Tables

Table 1:	Overview of submissions	5
Table 2:	SEE Report Structure	13
Table 3:	List of Appendices	14
Table 4:	Breakdown of submissions	15
Table 5:	Categorisation of issues raised in submissions	16
Table 6:	Refinements to the Project	18
Table 7:	The Project – Response to Submissions	59

Appendices

Appendix 1	Submissions Register
Appendix 2	Updated Mitigation Measures
Appendix 3	Key Issues Letter prepared by Department of Planning, Housing and Infrastructure
Appendix 4	Architectural Plans
Appendix 4a	Concept Plans
Appendix 4b	Reference Scheme
Appendix 5	Design Report
Appendix 6	Landscape Plans
Appendix 7	Visual Impact Assessment
Appendix 8	Traffic and Parking Matters Letter
Appendix 9	Noise and Vibration Impact Assessment
Appendix 9a	Ventilation on Noise Affected Facades Advice
Appendix 10	Detailed Site Investigation
Appendix 11	Remediation Action Plan
Appendix 12	Updated High Biodiversity Values Land Mapping

Appendix 13	Heritage Response to DCCEEW Comments
Appendix 14	Aboriginal Heritage Consultation
Appendix 15	Unexpected Finds Protocol (Aboriginal Heritage)
Appendix 16	Natural Ventilation Assessment
Appendix 17	Hydrogeological Report
Appendix 18	Stratum Subdivision
Appendix 19	Arboricultural Impact Assessment
Appendix 20	Geotechnical Report
Appendix 21	Updated Project Description

Executive Summary

This Submissions and Amendment Report has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Platino Properties Pty Ltd* (the Applicant) to address the matters raised by Government agencies, Council, the public, and stakeholder groups during the exhibition period for the State Significant Development (SSD) application (SSD 69850712) at 1-3 Skyline Place, Frenchs Forest for:

- 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.

On 8 May 2025, the SSD application was lodged with the Department of Planning, Housing and Infrastructure (DPHI). The application was placed on public exhibition from 5th June 2025 to 9th July 2025. During this time, there were 47 submissions received from government agencies, Council, the public and stakeholder groups. Of the 47 submissions, 40 of these were from the public.

An overview of the agency submissions received is provided below:

Government agencies	Councils
• Sydney Water • DCEEW (Water) • Ausgrid • DCEEW (Conservation) • Heritage NSW • TfNSW	• Northern Beaches Council

Table 1: Overview of submissions

On 10 July 2025, DPHI issued a letter requesting a response to the issues raised in the above submissions. Subsequently, on 16 July 2025, DPHI issued its key issues letter and requested those matters be responded to as part of this RtS. A copy of this letter is provided at Appendix 3.

The key issues raised by DPHI and in public submissions include:

- Permissibility of some aspects of the proposal
 - Built form and massing
 - Alternate massing
 - Cross ventilation
 - Peripheral communal open space
 - Tree canopy
 - Visual impact
 - Traffic and parking
- Height context
 - Comparative analysis
 - Interface with southern boundary
 - Wintergardens
 - Residential care facility open space
 - Deep soil
 - Contamination
 - Noise

On 20 August 2025 and 17 September 2025, the project team met with DPHI to discuss the key issues raised.

This Submissions and Amendment Report summarises and responds to issues raised both in submissions and by DPHI, following their preliminary review of the SSD. Further, the report provides information on proposed amendments to the SSDA as well as an updated justification and evaluation of the project as a whole.

The DPHI letter dated 16 July 2025 flagged several key issues that have been addressed below:

Permissibility

- Biodiversity values mapping has been amended by NSW Department of Climate Change, Energy, the Environment and Water ensuring there are no issues of permissibility at 1 Skyline Place (Appendix 12). New biodiversity maps have been adopted, and the proposed development no longer conflicts with any mapped biodiversity lands
- Clarification is provided to confirm that the Employment Generating Uses at the ground level will include uses that are permitted within the SP4 – Enterprise zone and will be subject to future consent.

Height Context

- The proposed tower form of Building C has been reduced in height by one storey, from 47.7m (14 storeys) to 42m (13 storeys).
- The proposed design changes seek to articulate the tower form through:
 - Increased setback to all façades of the top floor of the tower to better express the upper levels of the building.
 - The 6 and 13 storey components of Building C now present as separate building elements, helping to reduce their perceived bulk and scale.
- The revised tower form sits comfortably within both the existing and future context of the locality noting:
 - The existing Northern Beaches Hospital sits has a height of 47m.
 - The Frenchs Forest Town Centre is subject to the following height limits:
 - 40m base height control, and
 - 52m (16 Storey) including the +30% infill for affordable housing bonuses afforded through the Housing SEPP controls.
- The figure below shows the proposed height in the future context of the area and demonstrates that the proposed height is compatible with the evolving built form character of the locality:

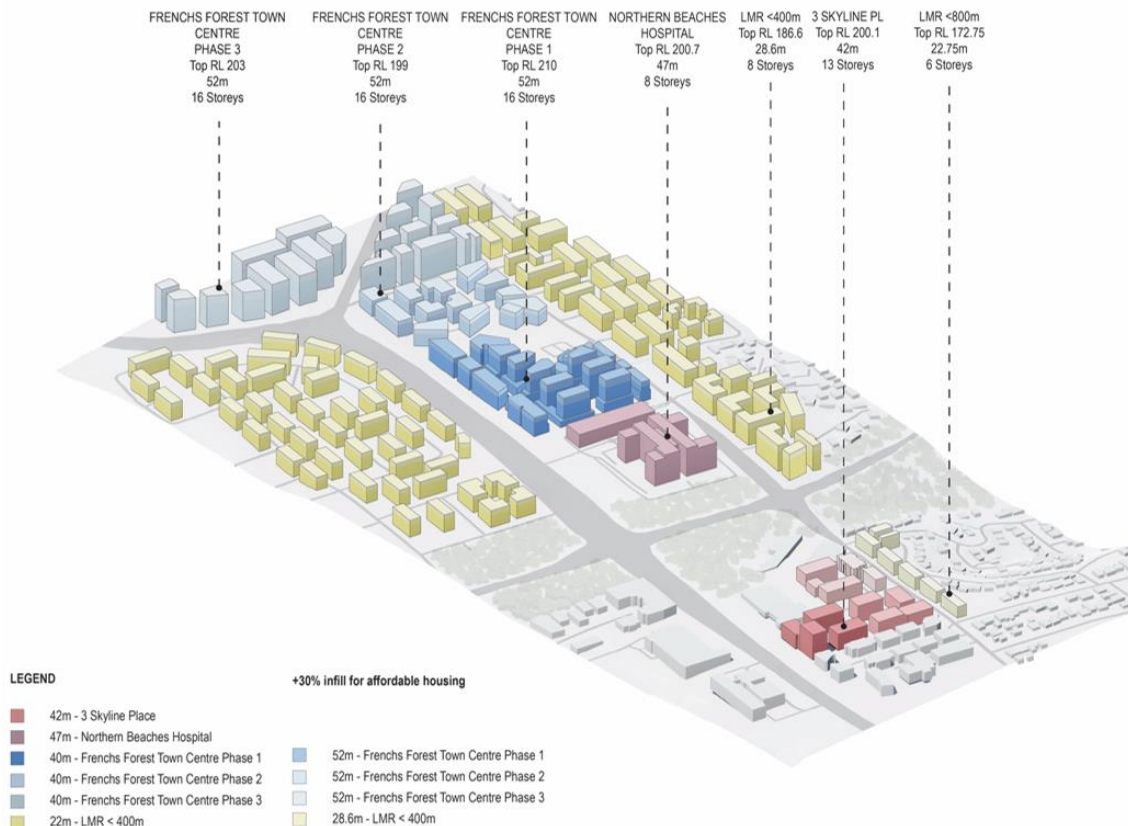


Figure 1 Proposed massing (Source: Smith & Tzannes)

Alternate Massing and Comparative Analysis

- As requested, a comparative analysis has been undertaken by Smith & Tzannes and is provided in the design report (Appendix 5).
- The comparative analysis assesses:
 - 4 storey envelopes across the site, which provide the minimum ADG compliant 12m building separation that result in greater overshadowing effects (when compared to the proposed scheme) and limited onsite amenity due to reduced opportunities for open space, deep soil and landscaping.
 - 6 storey envelopes across the site, which provide the minimum ADG compliant 18m building separation. This option has the same shortcomings as the 4 storey option.
 - 8 storey envelopes across the site. It is acknowledged this option provides an improved outcome when compared to the 4 and 6 storey alternatives. However, it still results in an inferior outcome when compared to the proposal due to the resultant overshadowing and constrained amenity outcome due to the development footprint.
- The preferred option and the 4 storey envelopes option are provided in the figure below. As demonstrated, the preferred option provides for the highest level of amenity as it consolidates landscaped open space, exceeds ADG building separation requirements across the site, and maintains a reduced height to Frenchs Forest Road and transition to lower density residential areas to the north.

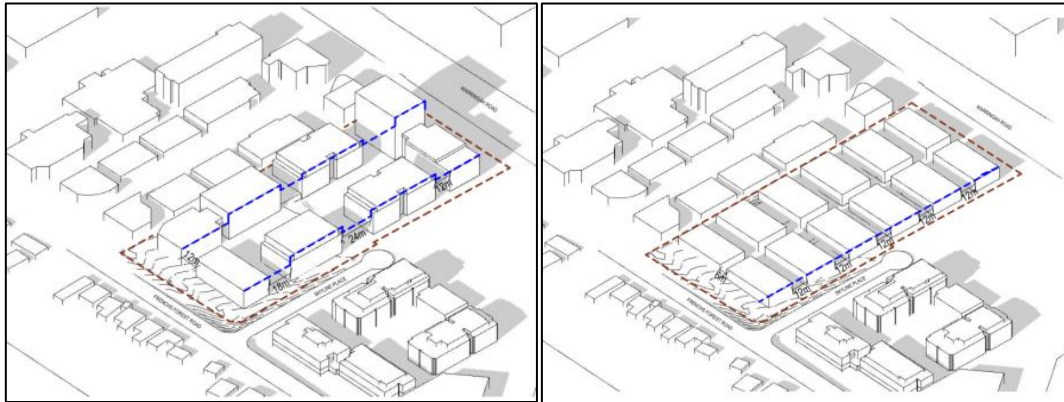


Figure 2 Proposed Massing, Proposed and 4-storey comparison (Source: Smith & Tzannes)

Building Form and Massing

- Building envelopes which interface with Frenchs Forest Road have been reduced from 6 storeys to 5 storeys to reduce bulk and align with built form at the adjoining number 7 Skyline Place.
- Increased recesses are provided to building envelopes at number 1 Skyline Place to ensure the future detailed design will provide for articulation and a greater variety in building length and width that will provide diversity in built form.
- As above, the tower form of Building C has been reduced by one storey with the uppermost level provided with a 9m setback to number 49 Frenchs Forest Road to the site's immediate east.
- These proposed amendments significantly increase building articulation and are compatible with approved seniors housing buildings on the opposite side of Skyline Place, providing a compatible development outcome.

The amended and proposed built form scheme, with the original and proposed Building C built form changes are shown below:



Figure 3 Proposed Built Form Building C (Source: Smith & Tzannes)

Southern Boundary

- Setbacks to the Southern Boundary:
 - The setback aligns with the adjacent built form along Warringah Road. Building C provides a setback of approximately 30m to Warringah Road, which includes a 16.5m setback to the southern boundary and a further setback of 16m from the boundary to Warringah Road.
 - The proposed setback allows for the size of the centralised courtyard at ground level to be maximised and provides transparency through the centre of the site, given it provides sight lines and access to all buildings within the Stage 1 Development, while the setback to Warringah Road is maintained for tree retention. The centralised courtyard is a superior design outcome, given it provides for deep soil zones, communal space and achieves a positive solar outcome, more than what can be achieved within the southern setback and much more usable open space.

Cross Ventilation

- Natural ventilation has been qualitatively assessed by a specialist wind consultant (Appendix 16).
- Calculation have been undertaken of potential units to meet ADG criteria with the findings as follows:
 - 65.1% (28 out of 43) of the residential units in Building A achieve natural ventilation
 - 68.75% (33 out of 48) of the residential units in Building B achieve natural ventilation

- 70.6% (60 out of 85) of the residential units in Building C achieve natural ventilation
- Overall, 68.8% of residential units on the first nine levels of all buildings in Stage 1 can meet the cross-ventilation criteria under the ADG, exceeding the 60% requirement.
- The Noise and Vibration Impact Assessment and response prepared by Acoustic Logic at Appendix 9 and Appendix 9a confirms that in noise-affected locations, mechanical ventilation is an appropriate and permissible alternative design solution to enable cross-ventilation.

Wintergardens

- Thermal modelling demonstrates that thermal comfort of apartments provided with wintergardens is achieved for 92.7% of the year compared with apartments with balconies which provide optimal thermal comfort for only 77.6% of the year (Appendix 5).
- The above shows the advantages of including winter garden due to increased wind and rain protection, improved acoustic amenity for the apartment and enhanced winter comfort by creating a warmer semi-internal environment.
- Senior residents have shown strong market preference for wintergardens, valuing the environmental control and versatility they provide.

Peripheral Communal Open Space

- The peripheral COS at the eastern and southern setbacks of Stage 1 provides residents with secondary areas for passive recreation and appropriate access has been provided from each building.
- These spaces are provided with walking pathways that provide a 'loop' throughout the site within a native landscape setting for resident amenity. Seating areas are located along the pathways for residents.
- The COS along the southern boundary provides a secondary passive area for use and includes direct access from Building C. This area includes the retention of existing native trees, new plantings and native understorey plantings to provide privacy from Warringah Road. Ground floor private terraces are also raised above natural ground to ensure additional privacy

Tree Canopy Coverage

- The proposal achieves canopy coverage of 34.83% of the site area for the Stage 1 Development.
- The Arboricultural Impact Assessment and Landscape Plans have been updated to include tree protection and tree retention plans, detailing measures for all trees requiring protection during the Stage 1 Construction.

Deep Soil Coverage

- The proposal achieves a deep soil zone of 22% of the site area for Stage 1 of the Development.
- Deep soil areas adhere to the ADG and Housing SEPP minimum requirements (percentages and widths)

Visual Impact

- An updated VIA has been prepared which assesses the additional view from opposite the site along Frenchs Forest Road, as requested by DPHI (Appendix 7).

Contamination

- A DSI has have been prepared for 1-3 Skyline Place. The DSI accompanies this report at Appendix 10.
- A RAP has also been prepared for 1 Skyline Place which accompanies this report at Appendix 11.

Traffic and Parking

- A Traffic and Parking Matters Letter has been provided at Appendix 8 and addresses issues raised by the Department and agencies, which are further discussed at Section 4.

Noise

- An updated Noise and Vibration impact assessment has been prepared and sets the applicable criteria that construction activities will need to comply with (Appendix 9). It is proposed that a detailed construction noise and vibration management plan (CNVMP) be prepared for the construction phase once construction methodologies are determined

Stratum Subdivision

- The amended proposal is accompanied by a Stratum Subdivision Plan at Appendix 18. The purpose of the subdivision plan is to separate the varying uses at the site which includes separate lots for the uses as follows:
 - Lot 1 – General Independent Living Units
 - Lot 2 – Employment Generating Uses
 - Lot 3 – Residential Aged Care Facility
 - Lot 4 – Affordable Independent Living Units

On the basis of the above, the project ensures compliance with the relevant controls and demonstrates that potential environmental impacts can be appropriately managed by the proposed development.

1 Introduction

This Submissions and Amendment Report has been prepared by *Keylan Consulting Pty Ltd* (Keylan) on behalf of *Platino Properties Pty Ltd* (the Applicant) to address the matters raised by Government agencies, Council, the public, and stakeholder groups during the exhibition period for the State Significant Development (SSD) application (SSD 69850712) at 1-3 Skyline Place, Frenchs Forest for the below:

- 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.

On 8 May 2025, the SSD application was lodged with the Department of Planning, Housing and Infrastructure (DPHI). The application was placed on public exhibition from 5th June 2025 to 9th July 2025. During this time, there were 47 submissions received from government agencies, Council, the public and stakeholder groups.

This Submissions and Amendment Report has been prepared in accordance with the Department's *State Significant Development Guidelines – Preparing a Submissions Report October 2022 (Appendix C)*. Additionally, this report has been prepared in accordance with Section 37 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) which permits the amendment of a development application at the discretion of the consent authority.

1.1 Proposed Development

The proposal (as exhibited) seeks consent 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 - F) 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 such as community facilities, health service facilities, educational establishment, early education and care facilities, neighbourhood shops, recreation facilities (indoor) and office premises
- approximately 51,343m² of Gross Floor Area (GFA) across the buildings, including:
 - a minimum non-residential GFA of 1,400m² within No. 1 Skyline Place
 - ~546m² of non-residential GFA within No. 3 Skyline Place
- 5% of all ILU GFA to be affordable seniors housing units for a period of 15 years
- large private and communal 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 13 storeys and comprising seniors housing including 195 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 GFA as affordable seniors living housing units for a period of 15 years
- landscaping
- basement car parking

An updated project description, which includes the original project description for reference, is included at Appendix 21.

1.2 Report Structure

This Submissions and Amendment Report has been prepared in accordance with the Department's *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) October 2022* and Section 37 of the EP&A Regulation. The structure of the report is as follows:

Section	Overview
Executive Summary	An overarching summary of issues and responses contained within this report.
1 Introduction	A short summary of the project and the assessment that has been carried out to date.
2 Analysis of Submissions	Analysis of submissions, detailing groups and people who made submissions and categorisation of issues raised in submissions.
3 Actions taken since exhibition	An overview of the actions the Applicant has taken since public exhibition to address the issues raised in submissions.
4 Response to submissions	A detailed summary of the Applicant's response to the issues raised in submissions.
5 Updated project justification	An outline of the updated project justification and evaluation of the project, incorporating relevant issues and the Applicant's response.

Table 2: SEE Report Structure

This Submissions Report should be read in conjunction with the following supporting documents:

Supporting documentation	Appendices
Submissions Register	Appendix 1
Updated Mitigation Measures	Appendix 2
Key Issues letter prepared by the Department of Planning, Housing and Infrastructure	Appendix 3
Architectural Plans	Appendix 4
Concept Plans	Appendix 4a
Reference Scheme	Appendix 4b

Supporting documentation	Appendices
Design Report	Appendix 5
Landscape Plans	Appendix 6
Visual Impact Assessment	Appendix 7
Traffic and Parking Matters Letter	Appendix 8
Noise and Vibration Impact Assessment	Appendix 9
Ventilation on Noise Affected Facades Advice	Appendix 9a
Detailed Site Investigation	Appendix 10
Remediation Action Plan	Appendix 11
Updated High Biodiversity Values Land Mapping	Appendix 12
Heritage Response to DCCEEW Comments	Appendix 13
Aboriginal Heritage Consultation	Appendix 14
Unexpected Finds Protocol (Aboriginal Heritage)	Appendix 15
Natural Ventilation Assessment	Appendix 16
Hydrogeological Report	Appendix 17
Stratum Subdivision	Appendix 18
Arboricultural Impact Assessment	Appendix 19
Geotechnical Report	Appendix 20
Updated Project Description	Appendix 21

Table 3: List of Appendices

2 Analysis of Submissions

2.1 Breakdown of submissions

During the public exhibition period, a total of 40 individual public submissions were received and 7 submissions were received from Government agencies, Council and stakeholder groups.

A breakdown of the submissions is provided below.

Submission	Breakdown
DPHI	Provided comment and requested additional information, regarding the below: • Permissibility of particular aspects of the proposal • Architecture and urban design • Building form and massing • Cross ventilation • Wintergardens • Communal open space • Residential aged care open space • Deep soil and tree canopy • Visual impact • Contamination • Traffic generation and parking • Infrastructure • Noise
Heritage NSW	Provided comment. Requested additional information
CPHR	Provided comment. Requested additional information
Transport for NSW	Provided comment. No additional information required
DCCEEW Water Group	Provided comment. Requested additional information
Northern Beaches	Council did not support the application and requested clarification on issues raised.
Sydney Water	Provided comment. Relating to primarily post-approval correspondence.
Ausgrid	Provided comment. Requested continue discussion regarding connection and requirements.
Public Submissions	Comments provided, addressed within DPHI responses.

Table 4: Breakdown of submissions

2.2 Categorising issues

In accordance with the Department's *State Significant Development Guidelines*, the issues raised in submissions have been categorised in the table below. A response to the issues raised is provided at Section 4 of this report.

Category	Summary of issues raised
The Project	
Permissibility and Zoning	• Encroachment of footprints into biodiversity land • SP4 zoning is for employment uses, concerns over land use conflict and loss of employment lands.
Urban Design	• Concern with location of tower form on site and height and visual impacts of proposal
Affordable Housing	• Small proportion of affordable housing within a large development
Procedural Matters	
Consultation	• Project has had limited community engagement
Insufficient oversight	• Concern with previous development at 5 & 7 Skyline Place and lack of oversight during construction
Community Interest	• Project not aligning to sustainable urban environmental outcomes
Economic, Environmental and Social Impacts	
Traffic and Transport	• Carparking on and off site • Traffic flow and circulation of Skyline Place • Construction impacts on environment • Increased visitors • Increased demand on public transport (bus) services in the area
Environmental	• Removal of mature trees on site, affecting tree canopy • Proposed design reduces deep soil onsite
Loss of Employment lands	• Proposed development is inconsistent with the zone objectives and will take away from employment opportunities within Frenchs Forest

Table 5: Categorisation of issues raised in submissions

3 Actions taken since exhibition

In response to the key matters raised within the submissions, the Applicant has undertaken amendments and clarification to the exhibited proposal. This section outlines the key refinements and additional assessment that has been undertaken since its public exhibition.

3.1 Further engagement

The Applicant undertook further consultation with DPHI via meetings on 20 August 2025 and 17 September 2025.

This consultation was for the purpose of seeking clarification on submission commentary from all stakeholders. The key issues discussed at the meeting have informed the refinements made to the project as detailed in the section below.

3.2 Amendments to the project

As previously discussed in this report, the project has been amended in accordance with Section 37 of the EP&A Regulation. Additionally, in response to issues raised in the submissions, amendments to the project have been made, as outlined in the table below:

Category	Summary of project amendments
The Project	Alternate Massing - Comparative analysis has been undertaken to test whether the preferred layout is the best urban design outcome at the site, see Design Report at Appendix 5. Built Form and Massing - Increased recesses are provided to building envelopes at number 1 Skyline Place to ensure the future detailed design provides for articulation and a greater variety in building length and width that will provide diversity in built form. - As above, the tower form of Building C has been reduced by one storey with the uppermost level provided with setbacks. - These proposed amendments increase the articulation and are now similar to those in the development on the opposite site of Skyline Place, providing a compatible development outcome. - Building envelopes which interface with Frenchs Forest Road have been reduced from 6 storeys to 5 storeys to reduce bulk and align with built form at the adjoining number 7 Skyline Place. Stratum Subdivision - It is proposed to include Stratum Subdivision of the proposal (refer Appendix 18) - The Stratum Subdivision will appropriately subdivide the uses at the site, separating out the employment generating uses, RCF, ILUs and affordable seniors housing units.
Procedural matters	Permissibility A review of the Biodiversity values map was submitted to DCCEEW, who subsequently updated the applicable mapping with justification for this

Category	Summary of project amendments
	change provided at Appendix 12. Consequently, there is no longer any high biodiversity values land at the site and therefore no issue regarding the permissibility of the proposal in relation to the biodiversity mapped land. • CPHR supports the BDAR prepared by Ecologique, noting CPHR's recommended conditions of consent include reference to the BDAR mitigation measures and tree protection requirements. • CGIs have been revised to only show potential permissible uses in the SP4 zone. Any future tenancy will be subject to future approval in relation to use.
Economic, environmental and social impacts of the project	• The Arboricultural Impact Assessment (AIA) and Landscape Plans have been updated to include a tree protection and tree retention plan, detailing the arrangement for all trees requiring retention and protection during the construction of Stage 1. • Stage 1 will achieve a canopy coverage of 34.83% and a deep soil provision of 22%. These provisions comply with the ADG and Housing SEPP requirements for seniors. • Thermal performance modelling has been carried out to compare the wintergardens and balconies. Thermal comfort of the wintergardens demonstrates thermal comfort for 92.7% of the year, compared to apartments with balconies at 77.6% of the year. • The finalised Hydrogeological Report is provided at Appendix 17. The report assesses the groundwater conditions at the site and confirms that the proposed development with a 'drained basement' option is feasible using industry-standard design and construction techniques. • The Visual Impact Assessment has been updated to include an extra viewpoint (Appendix 7), identified as Viewpoint 11. This view, from opposite the site along Frenchs Forest Road (163m away from the site), demonstrates in a low-moderate visual impact as existing vegetation in front of the site screens most of the future built form at No. 1 Skyline Place. • The Noise and Vibration Impact Assessment recommends a Construction Noise Vibration Management Plan (CNVMP). This will be prepared prior to the construction phase

Table 6 Refinements to the Project

An updated project description is also provided at Appendix 21.

3.2.1 Gross Floor Area – 1 Skyline Place

As is discussed within the original Environmental Impact Statement (EIS), the proposal establishes maximum building envelopes for the future development of No. 1 Skyline Place for employment generating uses, seniors housing and affordable seniors housing.

An updated reference scheme has been provided at Appendix 4b which demonstrates an indicative built form outcome that could be achieved within the proposed envelopes. The reference scheme achieves a GFA of 21,687m², including a non-residential GFA of 1,541m². Accordingly, the proposed envelopes are capable of facilitating a future built form comprising:

- Maximum GFA – 22,000m²
- Minimum non-residential floor area – 1,400m²

3.3 Further impact assessment

The issues raised in the submissions and in DPHI's comments have been assessed and the following documents have been provided to reflect this:

- Architectural Plans (Appendix 4)
- Concept Plans (Appendix 4a)
- Reference Scheme (Appendix 4b)
- Design Report (Appendix 5)
- Landscape Plans (Appendix 6)
- Visual Impact Assessment (Appendix 7)
- Traffic and Parking Matters Letter (Appendix 8)
- Noise and Vibration Impact Assessment (Appendix 9)
- Ventilation on Noise Affected Facades Advice (Appendix 9a)
- Detailed Site Investigation (Appendix 10)
- Remediation Action Plan (Appendix 11)
- Updated High Biodiversity Values Land Mapping (Appendix 12)
- Heritage Response to DCCEEW Comments (Appendix 13)
- Aboriginal Heritage Consultation (Appendix 14)
- Unexpected Finds Protocol (Aboriginal Heritage) (Appendix 15)
- Natural Ventilation Assessment (Appendix 16)
- Hydrogeological Report (Appendix 17)
- Stratum Subdivision (Appendix 18)
- Arboricultural Impact Assessment (Appendix 19)
- Geotechnical Report (Appendix 20)

The results and findings of the actions discussed in Section 3 of this report are discussed further in Section 4.

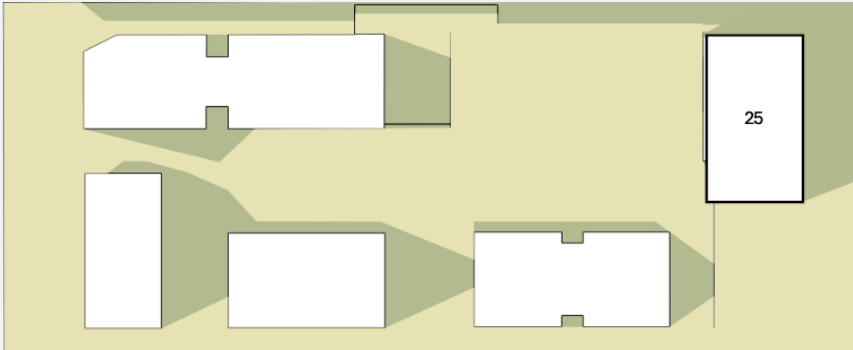
4 Response to submissions

This section provides a detailed summary of the Applicant's response to the issues raised in submissions.

The tables in this section have been structured in accordance with the categories identified in Section 2.

4.1 Department Submission

Ref.	Summary of submission	Response
A	Permissibility	
A1	Part 5 (Housing for Seniors or People with a Disability) of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) does not apply to land mapped under the NSW Biodiversity Values Map as: - Schedule 3 of the Housing SEPP identifies 'Land identified on the Map within the meaning of Biodiversity Conservation Regulation 2017, section 7.3' - The Biodiversity Values Map has been prepared in accordance with Part 7 of the Biodiversity Conservation Regulation 2017	- The Applicant submitted a review of the Biodiversity Values Map to the (DCCEEW) in light of the findings of the BDAR submitted with the EIS which confirmed that there was no ecologically significant vegetation at the site. - The Biodiversity Values Mapping has been amended accordingly by DCCEEW which removes any identified biodiversity land at 1 Skyline Place (Appendix 12). - The site now contains no land identified as Biodiversity Values and therefore, there are no issues in relation to permissibility of the proposal under the Housing SEPP. - All previously proposed mitigation measures relating to biodiversity have therefore been removed from the updated Mitigation Measures at Appendix 2.
A2	Several ground floor areas identified as 'employment generating uses'. Clarification of permitted commercial uses within the SP4 zone required	- Noted, the CGIs as shown in the EIS have been amended to remove the "café" shown on the ground floor. - As stated within the EIS, any employment-generating uses located at the ground floor of the development are subject to a future DA and will be permissible within the SP4 zoning under the WLEP 2011.
B	Urban Context and Height Justification	
B1	Project to address several key recommendations from the SDRP 2 regarding buildings heights. The following information is required: - detailed urban contextual study that justifies the proposed height and density and demonstrates how the increased height delivers improved amenity outcomes - a comparative analysis between 4-6 storey and 6-8 storey schemes, addressing all sub-points in item 7 of SDRP 2 - testing of a lower built form along Frenchs Forest Road East	- See alternative massing scheme provided within the Design Report at Appendix 5. - The preferred scheme has considered other alternatives; however, the proposed scheme is considered a superior outcome in terms of urban design and any off-site impacts for reasons fully detailed in the Design Report. - The subject site has no Height of Building (HOB) or Floor Space Ratio (FSR) provisions, with permissibility afforded by the Housing SEPP. - The environmental impact has been reduced through design changes to ensure the building heights and perceived bulk and scale are minimised through setting back of upper levels and providing variation in heights and massing across the site. - Given the site's size and location at the end of a cul-de-sac and adjacency to Warringah Road, it has minimal off-site impacts.

Ref.	Summary of submission	Response
	d) consideration and exploration of an alternative massing option that includes a point tower in the round, particularly along Warringah Road, to enable greater open space at ground level	• Providing evenly dispersed, shorter towers across the site would reduce valuable communal open space and have a greater impact on the ability to retain trees. • As requested by the SDRP, a single point tower option was explored. While an option with a single tower building provides more open space, it does not 'contain' the open space. The open space becomes too large and does not have an active edge as shown in the diagram below.  • Building envelopes fronting Frenchs Forest Road (Building D and part of Building E) have been reduced from 6 storeys to 5 to ensure greater cohesion with the street character and minimise any perceived impacts to low density residential areas to the north. • All building envelopes at number 1 Skyline Place have been revised to provide recesses to break up the intended building form and ensure the detailed design will provide appropriate articulation. • Building E has been provided with increased breaks to articulate the two forms, which have different heights and lengths to reduce bulk. • The full length of the development fronting Warringah Road (Building C) provides protection and mitigates any impacts to the COS from winds and traffic noise.
C	Architecture and Urban Design	

Ref.	Summary of submission	Response
C1	The massing of buildings is considered overly bulky and lacks variation, contrary to the urban design advice provided at SDRP 2, which recommended a more articulated and responsive built form. In this regard, it is recommended that: - long building envelopes to be broken up to improve visual permeability between buildings - variation in building widths be introduced to create opportunities for open space between buildings - a greater variety of massing be provided to respond to the site's differing conditions - increase upper level setbacks to be introduced - setbacks along the southern boundary be increased	- As noted above, the proposed building envelopes along the Frenchs Forest Road frontage have been reduced in height by one storey to better fit within the context and street character. - Building E, located within the eastern portion of 1 Skyline Place, has been provided with an increased recess so that this building will generally present as two elements to reduce perceived bulk and provide articulation. - Upper-level setbacks have been provided to all buildings at 3 Skyline Place to provide for greater variety in massing. This has also been shown in the building envelope plans for Building F given its interface with Skyline Place and to ensure reduced off-site impacts. - Setbacks along the southern boundary have been maintained. This setback provides for the retention of trees and landscaping and provides a buffer from Warringah Road. This setback also aligns with the existing setbacks of adjacent development fronting Warringah Road. - The height of the tower form has been reduced by one storey. Additionally, these buildings have been further articulated to provide more variation and reduce any perceived bulk.
C2	Cross Ventilation, clarification is requested: several single-aspect units (Figure 3 attachment B) are identified as achieving cross ventilation in stage 1 project to clarify how design of these single-aspect units responds to the objectives and design criteria of the Apartment Design Guide (ADG) in relation to natural cross ventilation, the ADG notes that single-aspect units and those adjacent to narrow slots are generally not considered to achieve effective cross ventilation. Revised plans should demonstrate how the proposal addresses these considerations and achieves the intended design outcomes	- Natural ventilation has been assessed by specialist wind consultant, SLR (refer Appendix 16). - The Natural Ventilation Assessment confirms that apartments which meet the cross ventilation criteria in accordance with the ADG are as follows: 53.5% (23 out of 43) of residential units in Building A 58% (28 out of 58) of the residential units in Building B 58.8% (51 out of 95) of the residential units in Building C - Notwithstanding, SLR confirms that some single aspect apartments also have the potential to meet ADG criteria based on similar single-apartment layouts achieved through Computational Fluid Dynamics (CFD) modelling and with respect to implementation of trickle vents to select apartments. - The trickle vents have been deemed to be an appropriate design solution to enable cross ventilation whilst mitigating noise impact as detailed in the Ventilation on Noise Affected Facades Advice at Appendix 9a. - Accordingly, calculations have been undertaken of potential units to meet ADG criteria with the findings as follows: 65.1% (28 out of 43) of the residential units in Building A

Ref.	Summary of submission	Response
		○ 68.75% (33 out of 48) of the residential units in Building B ○ 70.6% (60 out of 85) of the residential units in Building C • Overall, 68.8% (121 out of the 176) of residential units on the first nine levels have potential to meet the cross-ventilation criteria under the ADG.
D	Wintergardens	
D1	the treatment of wintergardens within the proposal raises concerns regarding natural ventilation and thermal comfort outcomes. To ensure alignment with best practice design principles. The objectives of the ADG and the seniors housing design guide: - demonstrate how apartments with wintergardens achieve effective natural ventilation, access and solar access - clarify whether any wintergardens are fully enclosed without permanent openings, noting that such configurations are generally not considered to contribute to effective cross ventilation - review and document the thermal performance of wintergardens, particularly on west-facing facades, and outline any shading strategies proposed to mitigate potential heat gain and enhance occupant comfort	• As detailed within the Design Report at Appendix 5, the project includes 2 types of wintergardens: ○ Type 1 – fully open ○ Type 2 – partially open (Both types offer opened and closed forms) • Thermal performance modelling has been undertaken to compare the wintergarden to a typical balcony. • Thermal comfort is achieved for 92.7% of the year compared with balconies which provide optimal thermal comfort for only 77.6% of the year. • The proposed wintergardens are considered to be a positive inclusion as they: ○ provide flexibility for use of the space; ○ increase wind and rain protection, improving amenity; ○ improve acoustic amenity in the apartment; and ○ improve winter comfort – creating a warmer semi-internal environment • Furthermore, seniors residents have shown strong market preference for wintergardens, valuing environmental control and versatility.
E	Communal Open Space	
E1	Concerns are raised regarding the usability, accessibility, and overall quality of periphery communal open space areas. To ensure these spaces function as meaningful amenity for residents, see below: demonstrate that peripheral communal open space areas genuinely usable and accessible for all residents	• Revised Landscape Plans have been prepared and are provided at Appendix 6. • Landscaped open space on the site has been designed to maximise usability. The provision of the central courtyard ensures high amenity open space for future residents noting its northerly aspect increases solar access and road noise from Warringah Road is blocked by Building C. • The peripheral communal open spaces provide residents with secondary areas for passive recreation and include adequate access paths from each building. These spaces provide residents with walking pathways that provide

Ref.	Summary of submission	Response
	b) to provide justification for the communal space adjacent to the Warringah Freeway, addressing concerns related to noise, accessibility, and privacy c) clarify interface between 1 and 3 Skyline Place, particularly the area shown in green that is proposed for waste storage	a 'loop' throughout the site within a native landscape setting. Seating areas are located along the pathway to provide rest stops for residents. • These peripheral areas include the retention of existing native trees, new tree plantings and native understorey plantings to provide screening and privacy from Warringah Road. • Ground floor private terraces are also raised above natural ground to provide additional privacy. • The proposed concept plans allow for future connections between Nos. 1 and 3, hence why there is a one storey building envelope shown which connects the two sites on the concept plans.
F	Residential Aged Care Open Space	
F1	as indicated in SDRP 2, demonstrate access to sunlight in winter and shade in summer for the RAC communal open space using shadow diagrams	• The RCF COS sits between Building C and D. • Revised shadow diagrams are provided in the detailed plans at Appendix 4, demonstrating that the RCF COS achieves solar access at 11am and 12pm during the winter. During summer months, this significantly increases whereby a large proportion of the RAC receives solar access for the entire day. The RCF COS benefits from privacy and discretion for elderly residents, given its location between buildings C and D.
G	Infrastructure	
G1	the infrastructure requirements and staging report show indicative location for substation kiosks. Provide preferred location on architectural plans stage 1 development	• Substation kiosk is now shown on updated Architectural Plans at Appendix 4.
H	Deep soil and Tree Canopy	
H1	Clarify the percentage of tree canopy at maturity to be delivered on site, as requested in SDRP 2.	• The Stage 1 site has a total area of 11,440m² and is required to provide a deep soil area of 15% (Housing SEPP) and 7% (ADG). • The proposal exceeds this requirement, providing 2,519m² or 22% of the site as deep soil with a minimum 6m dimension. • Deep soil areas have primarily been provided at the Warringah Road frontage, where a significant setback of 13.6m to 16.5m is provided, along with the eastern and western side setbacks.

Ref.	Summary of submission	Response
		- The landscape central courtyard within the internal circulation of the proposed development also provides for a large, deep soil zone. - Given the ample deep soil zone provided at the site, the proposal proposes a canopy cover of 34.83% of the site. It is noted that this will vary based on growing conditions/habitats and long-term maintenance regimes of trees and all landscaped areas.
H2	Update the Arboricultural Impact Assessment to include a Tree Protection Plan detailing measures for all trees requiring protection during the construction of stage 1.	- The AIA has been updated to include a Tree Protection Plan detailing measures for all trees requiring protection during the Stage 1 construction (refer Appendix 19). - The Landscape Plans have also been updated to ensure the tree retention plan reflects the abovementioned protection plan. (refer Appendix 6).
I	Visual Impact	
I1	Include an additional view point from the western corner of Frenchs Forest Road and Romford Road.	- The additional requested viewpoint from the western corner of Frenchs Forest Road and Romford Road is included within the Visual Impact Assessment (VIA) at Appendix 7. - It demonstrates that the northern façade of Building D is barely visible, as it is primarily screened by the existing retained trees within the frontage. This existing vegetation effectively screens the lower portion of the proposed building envelope. The northern façade of the massing envelope of Building E, while not visible, would be screened from the streetscape. - The additional viewpoint confirms the taller envelopes (Building E and F) within 1 Skyline Place and proposed buildings (Building A, B and C) within 3 Skyline Place are not visible. - The VIA demonstrates that the impacts at this viewpoint low to moderate and the proposal is appropriate in its context.
J	Contamination	
J1	The Preliminary Site Investigation indicates that contamination may be present on the site from multiple sources. In accordance with Section 4.63(3) of the State Environmental Planning Policy (Resilience and Hazards) 2021, a Detailed Site Investigation must be submitted to determine the	A Detailed Site Investigation (DSI) (Appendix 10) has been prepared for 1-3 Skyline Place and concludes as follows: <u>1 Skyline Place:</u> The site can be made suitable for the proposed development, subject to:

Ref.	Summary of submission	Response
	extent of contamination for the Stage 1 development. If contamination is confirmed, a Remedial Action Plan must also be provided to address the identified risks.	- Any soil requiring removal from the site, as part of future site works, should be classified in accordance with the "Waste Classification Guidelines, Part 1: Classifying Waste" NSW EPA (2014) - the implementation of a Remedial Action Plan (RAP) to manage the abovementioned environmental concerns and data gaps. <u>3 Skyline Place:</u> The site is suitable for the proposed development, subject to: - Any soil requiring removal from the site, as part of future site works, should be classified in accordance with the "Waste Classification Guidelines, Part 1: Classifying Waste" NSW EPA (2014) - An Unexpected Finds Protocol has been included in the DSI at Appendix 10 and should be followed during the excavation phase of the development. A RAP for 3 Skyline Place accompanies this report at Appendix 11, further detailing the appropriate methods to remove contaminated material from the site. The RAP includes the following remediation works at 3 Skyline Place: - Delineation of impacted fill at identified boreholes proposed to be completed as part of the remediation works. - Additional investigation is to be completed post-demolition of site structures to assess beneath the former building footprints and further define the extent of the required soil remediation works at 1 Skyline Place. The RAP concludes that the site will be made suitable for the proposed development, subject to the implementation of the remediation and validation works in accordance with the RAP at Appendix 11.
K	Traffic generation and parking	
K1	The Transport and Accessibility Impact Assessment uses trip generation rates that are inconsistent with those used in similar seniors living projects and with the NSW Government's Guide to Transport Impact	- A Traffic and Parking Matters Letter prepared by Varga Traffic Planning is provided at Appendix 8. - The Traffic and Parking Matters Letter notes that the AM peak travel for senior residents generally does not coincide with the morning network peak.

Ref.	Summary of submission	Response
	Assessment (GTIA) for seniors living developments in Sydney. Please provide updated traffic modelling based on the GTIA guidelines.	Therefore, a traffic generation rate of 0.09 peak hour vehicle trips per dwelling was adopted for the AM network peak period (i.e. 50% of the PM network peak period) in the submitted traffic report. • The traffic modelling in the submitted TIA dated 25 March 2025 is therefore in accordance with the NSW Government's GTIA for seniors living developments in Sydney. • Notwithstanding the above, for the purpose of a more rigorous assessment, and in accordance with the approved Traffic and Parking Assessment Report (dated 24 February 2021) for the seniors living development located at 5 Skyline Place (DA2021/0212), modelling has been undertaken using the following traffic generation rates: ○ AM: 0.1 peak hour vehicle trips per dwelling ○ PM: 0.3 peak hour vehicle trips per dwelling • Application of the above traffic rate to the various components of the Skyline sites – including the subject site – yields a traffic generation potential of approximately 128 vehicle trips per hour (vph) during the weekday AM peak period and approximately 189 vph during the weekday PM peak period, • The results of the updated SIDRA capacity analysis demonstrate that all surrounding intersections maintain the same Level of Service (LOS) as existing should the proposal be approved. As such, no road improvements or intersection upgrades are required as a consequence of the development proposal
K2	Please provide justification for the proposed parking spaces that exceed the minimum rates set out in the housing SEPP. This should include reasons why the extra parking is needed given the application emphasises the site has high accessibility by public transportation.	• The applicable parking provisions are contained under section 107 and 108 of the Housing SEPP which provide non-discretionary standards for car parking, specifying minimum rates. • In this instance, the Housing SEPP requires at least 247 spaces, and the provision of 283 car spaces therefore meets this minimum requirement. • TfNSW's GTIA further stipulates <i>'Resident funded developments tend to have a higher per unit cost and attract residents with higher financial resources. The car ownership levels of such residents are likely to be relatively high, as is the associated traffic generation and parking requirements of these residents.'</i> • Accordingly, the proposed parking aligns with the GTIA and has been designed to meet the demands of a resident funded development.

Ref.	Summary of submission	Response
K3	The proposed provision of 18 bicycle parking spaces for Stage 1 of the development is considered significantly below what would typically be considered appropriate for a seniors housing development of this scale. To support sustainable transport options, it is requested that the number of spaces be increased to better accommodate both residents and visitors. If a departure from the recommended rates is proposed, please provide a clear justification.	- No bicycle parking rate is nominated under the Housing SEPP for seniors housing. - The NSW Government <i>Planning guidelines for walking and cycling, Table 1: Suggested bicycle parking provision rates document</i>, nominates a rate of 3-5% of units be provided with bicycle parking within aged or disability housing. - The above rate translates to a requirement of between 12 and 20 bicycles spaces for the proposal, which complies through the provision of 18 spaces.
L	Noise	
L1	Revise the Noise and Vibration Assessment to estimate expected construction and operational noise and vibration impacts on nearby receivers and structures for Stage 1. The report should also outline any preliminary mitigation measures.	A response to DPHI's comments and an updated Noise and Vibration Impact Assessment (NVIA) is provided at Appendix 9 and Appendix 9a. The updated report identifies potential noise impacts to nearby residents at 5 and 7 Skyline Place and dwellings along Frenchs Forest Road, as well as commercial/industrial premises at 4 Skyline Place and along Frenchs Forest Road. These receivers may be exposed to elevated noise during demolition, excavation, piling and structural work. To mitigate the impacts of elevated noise, acoustic management levels for all receivers have been identified and are provided below: - For residences, management levels are: 60 dB(A) Leq(15min) ("noise affected") and 75 dB(A) Leq(15min) ("highly noise affected"). - For commercial receivers, the allowable level is 70 dB(A); for industrial receivers, 75 dB(A) . Construction vibration criteria are drawn from DIN 4150-3 and EPA guidelines: 5 mm/s PPV for dwellings and 20 mm/s PPV for industrial buildings. While ground-borne vibration impacts are unlikely due to setback distances (>40 m), activities such as rock breaking and piling could intermittently exceed EPA thresholds.

Ref.	Summary of submission	Response
		A CNVMP will be prepared prior to works to set monitoring locations, manage exceedances, and engage directly with affected receivers. The NVIA includes the following mitigation measures to address the above and will be implemented throughout the construction and operational phase as necessary: • Restrict high-noise construction works to standard ICNG hours. • Implement respite periods where highly noise-affected receivers (>75 dB(A)) may occur. • Use low-noise plant, silencers, and position stationary equipment away from sensitive boundaries. • Establish noise/vibration monitoring at most affected residences and commercial receivers. • Ongoing review of mechanical plant selection and acoustic treatments at CC stage. • Engagement with surrounding residents and businesses prior to and during construction to manage impacts. With the above measures, construction and operational noise and vibration impacts for Stage 1 can be effectively managed, and compliance with NSW EPA Noise Policy for Industry (NPfI) 2017 guidelines achieved.
M	Informal comments received via email	
M1	Please include further detail in the RTS report with respect to the affordable housing. In particular, the nature of it being seniors independent living units (ILUs) and an overview of how residents will be selected and how the rent will be calculated by the CHP.	In regards to the affordable seniors housing component, an appropriate restriction will be registered on title in accordance with section 88E of the <i>Conveyancing Act 1919</i> so that these units can only be utilised by seniors for affordable housing for a period of 15 years. The rental rates associated with the affordable seniors housing will be calculated in accordance with the requirements of the Housing SEPP In relation to occupants of the affordable seniors housing units, this will be managed by the Community Housing Provider (CHP). A CHP has not yet been engaged at this stage and it is considered reasonable that a condition of consent

Ref.	Summary of submission	Response															
		be imposed requiring an agreement with a registered community housing provider for the management of the affordable housing component be given to the Registrar of Community Housing prior to the issuing of an Occupation Certificate.															
M2	Address the non-discretionary development standards in Sections 107 and 108 of the Housing SEPP	An assessment against the relevant non-discretionary standards prescribed in Sections 107 and 108 of the Housing SEPP are provided in the table below: <table> <tr> <th>Standard</th><th>Comment</th><th>Compliance</th></tr> <tr> <td colspan="3"><i>107 Non-discretionary development standards for hostels and residential care facilities—the Act, s 4.15</i></td></tr> <tr> <td>(a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building</td><td>The proposal has a maximum building height of 42m. Notwithstanding, there is no maximum height of building control applicable to the site and it has been demonstrated that the proposed height is appropriate in its context and results in a superior urban design outcome.</td><td>No - but acceptable on merit</td></tr> <tr> <td>(b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m, ...</td><td>As above.</td><td>No – but acceptable on merit</td></tr> <tr> <td>(c) the density and scale of the buildings when expressed as a floor space ratio is 1:1 or less,</td><td>There is no maximum FSR control applicable to the site and it has been demonstrated that the proposed FSR (2.6:1) is appropriate in its context and results in a superior urban design outcome. The scale and density is acceptable given the size of the site, amount of open</td><td>No – but acceptable on merit</td></tr> </table>	Standard	Comment	Compliance	<i>107 Non-discretionary development standards for hostels and residential care facilities—the Act, s 4.15</i>			(a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building	The proposal has a maximum building height of 42m. Notwithstanding, there is no maximum height of building control applicable to the site and it has been demonstrated that the proposed height is appropriate in its context and results in a superior urban design outcome.	No - but acceptable on merit	(b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m, ...	As above.	No – but acceptable on merit	(c) the density and scale of the buildings when expressed as a floor space ratio is 1:1 or less,	There is no maximum FSR control applicable to the site and it has been demonstrated that the proposed FSR (2.6:1) is appropriate in its context and results in a superior urban design outcome. The scale and density is acceptable given the size of the site, amount of open	No – but acceptable on merit
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Ref.	Summary of submission	Response		
			space and landscaping achieved. The proposal provides for a compatible development with the existing seniors living development at No.5 and 7 Skyline Place and provides for a density that is commensurate with that envisaged for the Frenches Forest Town Centre Precinct.	
		(d) internal and external communal open spaces with a total area of at least— (ii) for a residential care facility—10m ² for every bed,	The proposal provides 628m ² of communal open spaces for the RCF, noting 20 beds are proposed. This far exceeds the 10sqm per bed requirement.	Yes
		(e) at least 15m ² of landscaped area for every bed,	The proposal provides for 305sqm of landscaped area for the RCF. Given the RCF includes 20 beds, 300sqm is required and the proposal exceeds this.	Yes
		(f) a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 6m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site,	Deep soil provision accounts for 22% of the site area and has minimum widths of 6m. Deep soil zone is predominantly central to the site to allow for plantings within a central courtyard for resident amenity, rather than interfacing with roadways.	Yes
		(h) for a residential care facility—at least 1 parking	The RCF requires 2.3 spaces in accordance with these	Yes

Ref.	Summary of submission	Response		
		space for every 15 beds in the facility,	provisions of the SEPP. 5 car spaces have been allocated to the RCF for staff and visitors.	
		(i) at least 1 parking space for every 2 employees who are on duty at the same time,		
		(j) at least 1 parking space for the purpose of ambulance parking.	Ambulance can be accommodated in the turning bay at ground level or alternatively, can park adjacent to entry to RCF in the case of an emergency given widths of driveways/pathways proposed.	Yes
		<i>108 Non-discretionary development standards for independent living units—the Act, s 4.15</i>		
		(a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building,	The proposal has a maximum building height of 42m. Notwithstanding, there is no height of building provision applicable to the site and it has been demonstrated that the proposed height is appropriate in its context and results in a superior urban design outcome.	No
		(b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m— ...	As above.	No
		(c) the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,	There is no maximum FSR control applicable to the site and it has been demonstrated that the proposed FSR (2.6:1) is appropriate in its context and	No

Ref.	Summary of submission	Response		
			results in a superior urban design outcome. The scale and density is acceptable given the size of the site, amount of open space and landscaping achieved. The proposal provides for a compatible development with the existing seniors living development at No.5 and 7 Skyline Place and provides for a density that is commensurate with that envisaged for the Frenches Forest Town Centre Precinct.	
		(d) a minimum landscaped area that is the lesser of— (i) 35m ² per dwelling, or (ii) 30% of the site area,	The proposal is required to provide 30% of the site area as landscaped area. It is noted that 33% of the site is provided as landscaped area, with 30% of this (3524.3sqm) allocated to the ILUs.	Yes
		(f) a deep soil zone on at least 15% of the site area, where each deep soil zone has minimum dimensions of 3m and, if practicable, at least 65% of the deep soil zone is located at the rear of the site,	Deep soil provision accounts for 22% of the site area and has minimum widths of 6m. Deep soil zone is predominantly central to the site to allow for plantings within a central courtyard for resident amenity, rather than interfacing with roadways.	Yes
		(g) at least 70% of the dwellings receive at least 2 hours of direct solar access between 9am and	83% of apartments achieve at least 2 hours solar access between 9am and 3pm at mid-winter.	Yes

Ref.	Summary of submission	Response		
		3pm at mid-winter in living rooms and private open spaces,		
		(h) for a dwelling in a single storey building or a dwelling located, wholly or in part, on the ground floor of a multi-storey building— (i) at least 15m ² of private open space per dwelling, and (ii) at least 1 private open space with minimum dimensions of 3m accessible from a living area located on the ground floor,	All ground floor apartments are provided with private open space (POS) in excess of 15m ² . All areas of POS includes a minimum dimension of 3m.	Yes
		(i) for a dwelling in a multi-storey building not located on the ground floor—a balcony accessible from a living area with minimum dimensions of 2m and— (i) an area of at least 10m ² , or (ii) for each dwelling containing 1 bedroom—an area of at least 6m ² ,	All apartments above ground level are provided with a balcony accessible from a living area with a minimum dimension in excess of 2m. These balconies are all in excess of the minimum area requirements.	Yes
		(k) if paragraph (j) does not apply—at least 0.5 parking spaces for each bedroom.	As per the Traffic and Parking Matters Letter at Appendix 8, the proposal provides in excess of the minimum parking requirement.	Yes

4.2 Agency Submissions

Ref.	Summary of submission	Submitter	Response
A	Permissibility		
A1	The balance between residential and non-residential floorspace is inappropriate. Does not align with the SP4 enterprise zone or the Northern Beaches Employment study (2019)	Council	- As addressed in the EIS, the proposal aligns with the objectives of the Housing SEPP and state plans to address the housing crisis under the Housing Accord. - The proposal provides a significant contribution to housing supply, aligns with requirements under the ADG and Housing SEPP objectives, and the proposal includes allocation of units for affordable housing, aligning with state level strategic plans - Specifically, the proposal is consistent with long-standing state level strategic planning objectives, as contained under Chapter 3, Part 5 <i>Housing for seniors and people with a disability</i> of the 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, we specifically note that the aims of the Housing SEPP include: - enabling the development of diverse housing (by setting aside local planning controls that would ordinarily prevent such housing); - ensuring new housing provides residents with a reasonable level of amenity; - promoting the planning and delivery of housing in locations where it will make good use of existing and planned infrastructure and services; and - encouraging the development of housing that will meet the needs of more vulnerable members of the community, such as seniors and people with a disability. - 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

Ref.	Summary of submission	Submitter	Response
			precincts, including opportunities for residential development which supports the function of the business park. The subject proposal is clearly 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.
A2	Multiple comments throughout council report mentioning the Warringah DCP controls	Council	- Section 2.10 of <i>State Environmental Planning Policy (Planning Systems) 2021</i>, establishes that DCPs do not apply to SSD. - Furthermore, section 3.43(5) of the EP&A Act states (bold our emphasis): (5) A provision of a development control plan (whenever made) has no effect to the extent that— (a) it is the same or substantially the same as a provision of an environmental planning instrument applying to the same land, or (b) it is inconsistent or incompatible with a provision of any such instrument. We note there are multiple Land and Environment Court decisions which confirm that DCP provisions had no effect by reason of section 3.43(5) (or equivalent earlier EP&A Act clauses), including: <i>Monahan v Warringah Council [2014] NSWLEC 1027</i> <i>Ironlaw Pty Limited v Wollondilly Shire Council (No 3) [2014] NSWLEC 1057,</i> <i>Gorgees v Fairfield City Council [2021] NSWLEC 1283</i> Accordingly, there is no requirement for the proposal to comply with the DCP, nor can DCP provisions which do not give effect to the Housing SEPP be applied. Notwithstanding, as identified in the EIS, the proposal generally aligns with the provisions of the DCP where relevant.

Ref.	Summary of submission	Submitter	Response
B	Urban Context and Height Justification		
B1	Building Height - Draft Northern Beaches LEP sets height limit of 11m - Warringah LEP 2011 does not specify a maximum HOB. - Large residential towers will result in strong opposition to intensification of light industrial uses on surrounding sites particularly Noise and will restrict operational capacity of the business park which is not acceptable in an SP4 zone.	Council	- The Draft Northern Beaches LEP proposes a height limit of 11m within the SP4 zone, whereby a maximum height of 21m can be achieved for employment generating uses. It is noted that this is currently not in force nor has it been exhibited and is therefore not a matter for consideration in accordance with the Act. - The proposed development is permissible under the Housing SEPP and continues to provide ground floor employment generating uses and will not negatively impact on the operation of the SP4 zone. - The use of ILUs and a RAC on site is considered acceptable given the existence of seniors housing in proximity of the development and residential areas to the north, noting building height is significantly reduced at the proposal's interface with Frenchs Forest Road.
B2	Character, Visual impact and context - Use and built form bear little relationship with the hospital, given they are separated from the bushland area of Wakehurst Parkway. Hospital is a unique form of development in the area and associated with transition ad is not reflective of the character of the Enterprise zone. Proposed development is misguided by the Northern Beaches Hospital HOB of 40m - Justification in the Design report states "tallest building form is positioned where it	Council	- The maximum height proposed on site is RL203.30 or 42m. - This is lower than the height of the Northern Beaches Hospital at 47m. - The site sits atop a ridgeline and therefore sits at a higher RL than the hospital despite the maximum height being less. - The maximum height of the future town centre (40m) is a similar height to the hospital and proposal. Further, town centre heights can be increased to 52m through the use of the 30% affordable housing bonuses under the Housing SEPP. - Despite the tower form of Building C, the remainder of proposed buildings on site have a similar maximum height to the approved development at Nos. 5 and 7 Skyline Place. - Sites surrounding the town centre benefit from the Low and Mid-rise Housing provisions of the Housing SEPP. Specifically, those sites north of the town centre that are zoned R3 Medium Density Residential can achieve maximum heights of 22m, noting that the in-fill affordable housing bonuses under the Housing SEPP can also be pursued to achieve a maximum height of 28.6m. - As stated within the VIA, the proposed development results in a low to moderate impact given the evolving character of the surrounding location

Ref.	Summary of submission	Submitter	Response
	has the least visual impact on existing residential neighbourhoods and has the least overshadowing impact on common areas", however significant visual impact from all views outlined in the VIA. 14 story tower is well above established tree canopy and not consistent with existing and future character of the area, proposing a negative impact on near and far views. When compared to the Hospital height.		and will not differ in scale and character to Frenchs Forest Town Centre and surrounds.
B3	Bulk and Scale: - Buildings D and E (1 Skyline Place) on Frenchs Forest Road at six storeys are consistent with the emerging character to the south of Frenchs Forest Road and to the west of the subject site, including the Jardin development. - A transition to eight storeys is above the six and seven storey buildings proposed, but is concentrated in the middle of the site. - Building C at 14 storeys at the southern corner of the site along Warringah Road is	Council	- Buildings D and E have been reduced by one storey, now with a maximum height of 5 storeys to ensure cohesion with the streetscape. - The remainder of building envelopes, with the exception of Building C, achieve maximum height of 6-8 storeys which is compatible with the approved developments at Nos. 5 and 7 Skyline Place to achieve a consistent built form outcome. - Alternative massing studies have been undertaken and are contained within the Design Report at Appendix 5. - The proposed height of Building C has been reduced to 13 storeys and as analysed within the Design Report, ensures high quality amenity at the site. The localised height increase as proposed at Building C ensures a superior outcome in terms of provision of landscaped area, deep soil zones and COS, noting solar access is also increased to outdoor and internal areas compared to a scheme of 6-8 storey buildings. - As provided in the design report, the alternative massing undertaken shows 4, 6 and 8 storey envelopes. These represent a similar FSR to that proposed and what can be achieved through different massing variations. These schematics demonstrate that the development cannot achieve a similar yield

Ref.	Summary of submission	Submitter	Response
	not consistent with height and density in this location and represents an overdevelopment of this portion of the site. - The height of Building C is over 45 metres (as shown on Stage 1 DA Drawing 202). The Northern Beaches Hospital has a height of 40 metres. A height of 14 storeys is unjustified and unsupported. - The maximum height for Building C should be six storeys, consistent with the western part of Building C and consistent with the transition of height at the perimeters of the subject site.		without the tower form, whereby a reduction in height and alternate massing would significantly decrease tree retention, deep soil and COS on site.
C	Safety		
C1	Ausgrid: - Underground Cables are in vicinity of development - Overhead powerlines are in the vicinity of development - Proximity to existing poles (New Driveways) - New or modified connection	Ausgrid	- Noted. - Standard conditions of consent can be imposed to ensure the safeguarding of all Ausgrid assets during construction.

Ref.	Summary of submission	Submitter	Response
Economic, Environmental and Social Impacts			
E	Deep Soil and Tree Canopy		
E1	Deep soil areas shall be part of the retention of existing trees and otherwise shall be provided to encourage tree canopy to communal open space areas for outdoor comfort.	Council	- The proposal retains 15 trees within property boundary for Stage 1 at the site and provides for an additional 124 trees, far exceeding the 18 proposed to be removed and significantly increasing canopy cover at the site. - The proposal provides 22% of the site area as a deep soil zone, with minimum widths of 6m, far exceeding Housing SEPP and ADG requirements to facilitate significant tree canopy coverage on the site.
F	Visual Impact		
F1	Significant visual impact from all views as outlined in the VIA. This includes, Frenchs Forest, Warringah Road and Sydney CBD	Council	- The VIA prepared by Paddock Landscape Studio (refer Appendix 7) demonstrates the proposal will have a low to moderate visual impact, given the siting and design of the proposed buildings, selected materials and building articulation. - Further, the proposed dense landscaping scheme ensures the proposal appropriately fits within the context of the site
G	Traffic generation and parking		
G1	TFNSW reviewed the submitted information and has no requirements as the proposed development is unlikely to have a significant impact on the state classified road network	TfNSW	Noted
G2	Traffic Generation - TfNSW Guide to Transport Impact Assessment recommends weekday peak hour rates of 0.3 trips per dwelling should be used for a seniors with a weekday pm peak hour rate of 0.17 trips per dwelling. - TfNSW guide recommends rates of 0.192A for Am peak	Council	- As per the response to DPHI comments at Section 4.1, the Traffic and Parking Matters Letter provided at Appendix 8 demonstrates that appropriate rates have been used in accordance with the GTIA. - Additionally, car parking has also been provided in accordance with the GTIA which is also discussed in the response to DPHI comments in Section 4.1.

Ref.	Summary of submission	Submitter	Response
	hour traffic generation and 0.359A (where A = GLFA) from small suburban shopping centres and this rate would differ from the 1.69 trips and 1.2 trips per 100m² used by applicants traffic consultant - Proposed development on 3 Skyline Place is proposed to provide 326 parking spaces, in excess of the 270.5 spaces required under the SEPP/DCP. 283 parking spaces proposed for residents is well in excess of the 255 spaces required under the SEPP. Higher parking rates attract higher levels of car ownership and high traffic generation than the 0.3 trips per dwelling under the TfNSW guide. - Recommended revised Transport and Accessibility Impact Statement in light of higher levels of traffic generation. - Recommended SIDRA modelling undertaken based upon the incorrect traffic generation rates. Including network modelling of Frenchs Forest Road East		

Ref.	Summary of submission	Submitter	Response
G3	Road Infrastructure requirements • Accessible pathway links to Skyline Shops (Frenchs Forest Road East), Northern Beaches Hospital and Skyline Place. • Appropriate upgrades to intersection of Skyline Place with Frenchs Forest Road east (probably to incorporate a signalised intersection with pedestrian phases on all legs). The signalisation of the Skyline Place intersection will facilitate ease of access to/from bus stops on either side of Frenchs Forest Road East to meet access to public transport requirements outlined in the SEPP. • Traffic signals may require widening of Skyline Place to create additional storage capacity on approach to Frenchs Forest Road East while retaining existing kerbside parking on both sides of the road. Potential need for slip lanes and/or right turn protection storage bays on for safe right turn entry and exit from Frenchs Forest Road East	• Council	• As per the response to DPHI comments at Section 4.1, the Traffic and Parking Matters Letter provided at Appendix 8 demonstrates that appropriate rates have been used in accordance with the GTIA. The assessed traffic generation has minimal impact on surrounding traffic flows as all intersections continue to perform at the same LOS and therefore, no upgrades are required.
G4	Internal Road Network	• Council	• Noted

Ref.	Summary of submission	Submitter	Response
	Basement carpark network appears to allow for two way vehicle circulation and appears to be designed adequately		
G5	Pick up and drop off requirements - Pick up/drop off provision should be through a combination of onsite short term drop off/pick up facilities and a mix of high and medium turnover restricted parking within the site, this may include facilities for mini-bus vehicles/ taxis/ 'Uber' - Emergency vehicle access and evacuation locations	Council	- Three pick-up/drop off spaces have been provided near the site's entrance. - As discussed in EIS, an internal loop road is provided and can be used as drop-off/pick-up area for ambulances. This area will be secured by lockable/foldable bollards, such that a RAC staff would remove bollards upon arrival of SRV ambulances for emergency use. - This loop road will not be accessible to public, with access permitted for emergency vehicles only
G6	Parking provision - Visitor parking (22) is too low. Warringah DCP requires 1 visitor space for each 5 units. For 200 units this would equate to 40 visitor parking spaces. As residential parking exceed SEPP some of the residential parking should be reassigned to visitor parking to meet DCP. - Off street loading bay which caters for a Council's 10.5m waste collection vehicles is adequate and would also serve the off street parking requirements for removalist trucks adequate overhead	Council	- As discussed in the EIS, the Housing SEPP does not nominate an off-street parking rate for visitors. A total of 22 spaces have been provided to ensure adequate off-street parking is provided for visitors. - All off-street car parking spaces enable forward entry and egress from the site.

Ref.	Summary of submission	Submitter	Response
	clearance to/from and within the loading bay of 4.5m must be demonstrated. Off street parking must allow for appropriately dimensioned parking spaces allowing for manoeuvring to enable forwards entry and egress consistent with the requirements of all parts of the AS/NZS 2890		
G7	Bus operation requirements - Safe access and DDA compliant access to and from public transport and within the premises are considered an important priority - Abovementioned signalised pedestrian crossing at the intersection of Skyline Place and Frenchs Forest Road East would facilitate safe and acceptable pedestrian access to/from public transport	Council	The Traffic and Parking Matters Letter at Appendix 8 confirms safe and compliant access between the site to and from public transport as follows: <i>Footpaths are generally provided on both sides of all roads in the vicinity of the site to encourage walking as an active form of transport.</i> <i>Sealed footpaths are provided on both sides of Skyline Place and Frenchs Forest Road East, with the pathway along the southern side of Frenchs Forest Road East comprising a wide shared pathway for cyclist and pedestrians.</i> <i>Key intersections with Frenchs Forest Road East also have signalised pedestrian crossings, thereby allowing pedestrians accessible pathway links to Skyline Shops and Northern Beaches Hospital.</i> <i>In addition, the proposed development provides accessible pathways, including along the internal access road, as well as providing a pedestrian crossing across Skyline Place.</i> <i>As such, no additional pathway links are required.</i> As above, further traffic assessment demonstrated all surrounding intersections continue to perform at the same LOS and do not warrant any upgrades.
G8	Active Transport provision Proximity to Northern Beaches hospital is not	Council	As outlined in the EIS, the proposal meets the locational criteria for seniors housing in the Housing SEPP.

Ref.	Summary of submission	Submitter	Response
	determinative to suitability of site. Seniors would still require car / ambulance transport to get to the hospital (if that was preferred patient venue). Facilities on site to cater for ease of access to ambulances have been proposed on 3 Skyline Place Access to Forestway shopping centre (1.2km) is not considered an easy path of travel from site for the aged demographic potentially including persons with disability. Active travel even an able bodied person is difficult and inconvenient given the major intersection crossing to be negotiated. Council does however want to reduce private vehicle use and promote the use of active and public transport where feasible. Noted increased use of E-bikes make travel by bicycle more convenient even in challenging terrain or for the less mobile. This aspect must be reviewed and facilities for pedestrians and cyclist incorporated to facilitate active travel.		- As discussed in the EIS, the site is located in close proximity to the following areas: - Forest Central Business Park is located adjacent to the eastern boundary of the site. The business park includes a wide variety of specialist medical practices. - Site is located within 550m walking distance to Skyline Shops, which includes a wide variety of shops and services including supermarkets, restaurants and specialty stores. - Forest Way shopping centre is located approximately 1.5km west of the site which includes Woolworths & Aldi supermarkets, banks, restaurants/cafes, a fruit market and specialty stores. - The site provides three tenancies for employment generating uses which may include specialist medical uses, neighbourhood shops etc, to service future residents and increase accessibility. - The existing TIA submitted with the EIS deems the site to be highly accessible to essential services and transport options. - Bus zones are located at regular intervals along both sides of Frenchs Forest Road providing access to Chatswood, Manly and Warringah Mall. - A Construction Traffic Management Plan was submitted with the EIS. This is to be implemented throughout the construction phase as detailed in the submitted Mitigation Measures.

Ref.	Summary of submission	Submitter	Response
	Impact of the development (including at construction phases) on the available parking in the local area will need to be considered and addressed where issues are raised. Existing on-street parking should not be lost.		
H	Environment		
H1	- Water supply, take and licensing. - Insufficient information provided to confirm the potential groundwater inflow volumes	DCCEEW water group	The finalised Hydrogeological Report is provided at Appendix 17 which confirms the nature of groundwater flows at the site.
H2	- Groundwater impacts and dewatering requirements: - EIS has not provided a volumetric quantification of groundwater take, - Additionally, EIS has not provided assessment of impacts to groundwater due to construction or operation	DCCEEW water group	- The Hydrogeological Report at Appendix 17 confirms that the estimated groundwater removal during the construction stage is around 0.54ML/180 days. - Section 6.8.2 within the submitted EIS, along with the submitted Surface Water and Groundwater Impact Assessment (SWGIA) prepared by Aargus Group, confirmed impacts to groundwater during construction and operation. - Appropriate mitigation measures were recommended and included in the formal list of Mitigation Measures to ensure impacts to groundwater are reduced.
H3	Arboricultural Impact Assessment (AIA) be updated	CPHR (DCCEEW)	The AIA now includes a tree protection plan (refer Appendix 19).

Ref.	Summary of submission	Submitter	Response
H4	Landscape Plan be updated and noted inconsistency with the AIA	CPHR (DCCEEW)	Landscape Plans have been updated to ensure consistency across documentation (refer Appendix 6).
H5	Supports the Biodiversity Development Assessment Report	CPHR (DCCEEW)	Noted.
H6	Water and Wastewater Servicing - Preliminary assessment indicated that water and wastewater servicing should be available for the proposed development - amplifications, adjustments, deviations and/or minor extensions may be required - detailed requirements will be provided at the Section 73 application stage	Sydney Water	Noted.
H7	Documentation for DA2025/0679 titles 1& 3 Skyline Place, Frenchs Forest Integrated Water Management Plan only addresses water management for 3 Skyline Place, M9 through M11 for discussion	Council	Details of relevant water infrastructure for No. 1 Skyline Place will be provided at the detailed DA stage.
H8	Water Quality Proposed stormwater treatment chain includes a rainwater tank minor stormwater reuse for irrigation and a chain of pits	Council	Noted. Relevant connections will be addressed at the post-approval stage.

Ref.	Summary of submission	Submitter	Response
	with baskets and a proprietary filter cartridge system, prior to the connection with adjacent stormwater network system along Warringah Road. The catchment tram is not the approval body for this connection and does not know who owns stormwater pipes along Warringah Road, if it is Council or Transport for NSW. Proposed treatment chain performance is satisfactory in principle and meets Council's Water Management for Development Policy Criteria for pollutant reduction		
H9	Groundwater Proposal includes below ground works, such as excavation for basements. The geotechnical report and groundwater report states there is likely to be groundwater interference but does not detail whether basements are to be tanked or not and does not highlight any potential dewatering requirements during construction	Council	- The finalised Hydrogeological Report is provided at Appendix 17. - The report confirms that a "drained basement" system is the preferred option for the development. A soldier pile wall with a shotcrete infill system is to be considered for encountered subsurface condition. - The Geotechnical Report at Appendix 20 has also been updated to reflect the findings of the Hydrogeological Report. Recommendations from the updated Geotechnical Report to mitigate impacts to groundwater conditions during construction have been included in the 'Updated Mitigation Measures' at Appendix 2.

Ref.	Summary of submission	Submitter	Response
H10	Erosion and Sediment Control As the proposed development is in the headwaters of Curl Curl Creek in the Manly Dam Catchment, a high-quality catchment, it is recommended that the proponent prepare a more detailed erosion and sediment control plan for the site than provided in the Integrated Water Management Plan, which connects to the Warringah Road stormwater system. The Catchment team is not the approval body for this connection and does not know who owns the stormwater pipes along Warringah Road, if it is Council or Transport for NSW	Council	- A detailed erosion and sediment control plan can be prepared prior to construction. - The applicant raises no objection to the imposition of a condition requiring a detailed erosion and sediment control plan be provided prior to the issuing of the relevant Construction Certificate.
H11	Engineering: - On site stormwater detention is to be provided for the development in accordance with Councils Water Management for Development Policy . The pre developed stormwater flow conditions are to be assumed as state of nature up to the 1/100 AEP storm event. - The stormwater management system is also	Council	The proposed stormwater management system as submitted has been designed in accordance with Council's policy.

Ref.	Summary of submission	Submitter	Response
	to include climate change factors in accordance with section 4.2 of ARR 2019. Any stormwater connection to Warringah Road will need Transport NSW approval/concurrence.		
I	Heritage		
I1	Aboriginal Cultural Heritage Assessment Report (ACHAR): clarify number of RAPs for the project and amend discrepancies	Heritage NSW	8 registered Aboriginal parties were consulted for this project (refer Appendix 14). The one mention of 9 in the ACHAR is an error. The confirmed RAPs were: - A1 Indigenous Services- Caroline Hickey - Didge-Ngunawal Calan- Lilly Carroll - Butacarbin Aboriginal Corporation- jenny Beale - Kamilaroi Yankuntjatjara Working Group- Phil Khan - Thomas Dahlstrom - Metropolitan Local Aboriginal Land Council (LALC) - Mura Gardi Aboriginal Corporation – Tiarna Bell - Gaimaragal Group- Susan Moylan Coombes - Metropolitan LALC was included based on a previous agreement with the heritage consultant. - The Gaimaragal Group (not on the DECCW list) was included following the advertisement in the local paper and after discussion with Susan Moylan-Coombes who verbally requested to be registered as she was engaged by the client in the Designing with Country component of the project. - Murra Bidgee Mullangari Aboriginal Corporation (Darleen Johnson) was not a RAP for this project as that group did not register their interest by the advertised closure date for registrations.

Ref.	Summary of submission	Submitter	Response
I2	Provide additional documentation relating to Aboriginal community consultation process to assist in evaluation of the adequacy and completeness. To include: • Copies of Stage 1 Agency notification including copies of all responses received • Evidence that the Stage 1 letter requesting registration of interest in the project was sent to all Aboriginal Cultural heritage knowledge holder (groups/individuals) who were identified during stage 1 agency notification process and copies of all responses received • Copy of Stage 1 Newspaper advert • Evidence of Stage 2/3 Project information and assessment methodology was provided to all RAPs Evidence that the Stage 4 draft ACHAR was provided to all RAPs	• Heritage NSW	• All requested documentation relating to Aboriginal community consultation is provided at Appendix 14.
I3	Show Murra Bidgee Mullangari Aboriginal Corporation has been included in the consultation	• Heritage NSW	• Murra Bidgee Mullangari was not included as a RAP in this project as they failed to register by the advertised closing date. The heritage consultant

Ref.	Summary of submission	Submitter	Response
	process, along with that Stage 2/3 assessment methodology and Stage 4 Draft ACHAR was provided to Murra Bidgee Mullangari Aboriginal Corporation consistent with this group having registered as a RAP for the project		acknowledges that their EOI correspondence should have been set aside as non-compliant and not reported in the document.
I4	Following revision made when finalising Appendix 3 for its inclusion in any post-approval management documentation that may be prepared for the project: - Delete following text from Step 4 consistent with the fact that no previous Aboriginal site recording exit within the assessment area: “<i>if the location of the finds is consistent with the previous recording, construction work can proceed provide that any required mitigative actions defined in an approved management plan which addresses cultural heritage impacts have been completed</i>” - Update Step 7 to include notification and involvement of RAPs, noting must be involved in decisions regarding the management of Aboriginal Cultural heritage	Heritage NSW	An updated Unexpected Finds Protocol is provided at Appendix 15 accordingly.

Ref.	Summary of submission	Submitter	Response
	Consistent with the predictive model for the project and the understanding that art and engraving sites represent the dominant Aboriginal site type within the local region, update protocol to include specific mention of the inspection of any sandstone surfaces for potential engravings that may be exposed during the construction		
J	Waste		
J1	- No commercial waste room shown on basement plan for development. Commercial waste shown in the Waste Holding Bay. This must be separate screened location to domestic waste which needs to be accessible for a private commercial contractor to service and must not be accessible by residents. - Medical waste for RACF's need to be considered - Residential waste storage rooms must not be accessible to commercial operators within the development	Council	- Waste rooms as the basement level have now been annotated for allocation for each use. - The proposal includes a ground-floor waste loading bay for both residential and non-residential uses. This has now been amended to provide for separate waste rooms for commercial waste residential and medical waste.
J2	Plans show 660L bins not standard Northern Beaches Council 240L bins. This can be accommodated for	Council	Noted

Ref.	Summary of submission	Submitter	Response
J3	Collection of domestic waste, recycling and bulky waste will be councils domestic waste contractor using the standard service of a 10.5m HRV requiring 4.5m clearance throughout	Council	Noted
J4	- Plans submitted with the Waste Management Plan should demonstrate the path that the building manager will have to take to get bins from the chute rooms to the bin holding bay and that path should be a dedicated pathway that does not intersect the vehicular driveway on collection days or via a dedicated service lift from B1 to the waste holding bay. Bulky waste would be collected every 5 weeks approximately based on the number of units and similarly bulky waste needs to be transported to the holding bay for collection via a dedicated pathway or service lift. - Space for bin moving equipment should be shown on the plans.	Council	Further detail in relation to paths of travel for waste can be provided in a detailed Waste Management Plan as a condition of consent.
J5	Council supports the collection of waste in cores with dedicated waste chute	Council	Noted

Ref.	Summary of submission	Submitter	Response
	rooms for each core for putrescible waste with provision of residential recycling bins adjacent to the waste chute on each residential floor of the building, with spatial provision for spare 240L MGBs to be stored within the waste room at the base of each chute.		
K	Landscape		
K1	The site is in close proximity to the Frenchs Forest Town Centre where the desired character is an urban forest with green streets, making a feature of the forest. To achieve this the Warringah DCP control B14 Main Roads Setback objectives and requirements shall be incorporated to provide a dense landscape buffer between the development and the main road of Warringah Road within the required 30 metres, free of structures above and below the natural ground. The proposal does not satisfy this requirement.	Council	- Noted, however as previously discussed, the Warringah DCP does not apply to this development. - Notwithstanding, the project complies with Housing SEPP and ADG requirements for landscaping and communal open space, including a densely planted landscaped setback to Warringah Road.

Ref.	Summary of submission	Submitter	Response
K2	- In seeking to increase building heights, the quantity of landscape area shall be adequate to soften the built form and thus the required landscape area shall be satisfied. - From the visual assessment, it is clear that the forested ridgeline will be disrupted and there is no analysis from local areas of high use in proximity such as Manly Dam, Wakehurst Parkway and the National Park. - The indication to preserve the trees in the biodiversity zone along the frontage of Frenchs Forest Road, the western boundary areas and the frontage of Warringah Road shall ensure that no encroachment by structures and by stormwater management or design elements occur.	Council	- Noted. The Landscape Plans at Appendix 6 demonstrate that landscaping is an integral part of the proposal, with dense vegetation proposed at all boundaries and within the central courtyard. - As detailed in the response to the Department comments above, DCCEEW have removed the biodiversity values land within 1 Skyline Place, where it adjoins Frenchs Forest Road. As included in the supporting 'Updated High Biodiversity Values Land Mapping' at Appendix 12, in revising the mapping, DCCEEW commented: <i>The site was assessed by a Departmental Senior Threatened Species Officer who found no areas of Duffys Forest Ecological Community on the property. The officer found that the site does not contain canopy trees, native shrub or groundcover species that would be consistent with the NSW Scientific Committee - final determination for the Duffys Forest Ecological Community - endangered ecological community listing.</i> <i>This has resulted in all BV Mapping being removed from your property.</i> - Notwithstanding, further consideration to existing plantings/vegetation will be given in the detailed DA for 1 Skyline Place.
K3	Easements shall be located away from existing trees identified for retention, as this will increase tree canopy loss.	Council	No easements are proposed. Notwithstanding, all new tree plantings are proposed outside of existing easements at the site,
K4	Proposed planting on structure requires appropriate structural slab design over-	Council	Noted. Appropriate conditions can be imposed to ensure adequate arrangements for planting on structures, including soil depth.

Ref.	Summary of submission	Submitter	Response
	and-above typical slab design and construction, to support the 'wet weight' of soil, plants and other materials. All on slab planted areas shall meet the ADG requirements for soil depth.		
K5	• New tree and understorey planting along the frontages of Frenchs Forest Rd East and Warringah Rd shall be mainly native. • Include a range of tree planting in all boundary setbacks to ensure appropriate buffers are established as planting matures; large and medium trees for canopy; small trees and large shrubs for establishing the mid-storey. The inclusion of mid-storey planting is particularly important for the Frenchs Forest Rd East and Warringah Rd frontages. • Consider shade impacts from the built form along the Warringah Rd frontage when selecting plant species. • Include large tree species between the 14-storey portion of Building C and Warringah Rd.	• Council	• It is noted that the proposal seeks to remove 18 trees from the site whilst planting 124 new trees, including: ○ 34 trees with a canopy of 3-5m ○ 41 trees with a canopy of 5-10m ○ 49 trees with a canopy of 10-25m • Importantly, and as shown in the above list, the proposal prioritises the provision of trees with large canopy cover. • As shown in the Landscape Plans at Appendix 6, a variety of different sized plant species is provided within the Warringah Road setback to ensure dense screening.

Ref.	Summary of submission	Submitter	Response
	Prioritise retention of prescribed trees around the perimeter of the site particularly the biodiversity values area fronting Frenchs Forest Rd East.		
K6	Prioritise high/medium significance tree retention over pathway locations. Pathways can be directed around trees using tree sensitive construction techniques as directed by an Arborist.	Council	- Trees have been retained where possible. - As above, the proposal significantly increases provision of trees at the site and will achieve over 30% canopy cover.
K7	- Articulate basement walls where possible to retain high significant trees. - Selected plant species shall not be priority or environmental weed species. Remove all proposed Rhipidolepis from the plant species list; although a cultivar is selected this species is deemed an environmental threat.	Council	- High value trees have been retained where possible. - Selected plant species have been revised accordingly, refer to Landscape Plans at Appendix 6.
K8	No impact to trees and vegetation in the road reserve or neighbouring properties is permissible.	Council	Noted. No trees or vegetation outside of the site boundary are impacted by the proposal.

Table 7: The Project – Response to Submissions

4.3 Public Submissions

Issue	Response	Reference
The Project		
Zoning/Strategic Alignment While Seniors SEPP provides for permissibility, the SP4 zone prioritises employment generating uses	The site is zoned SP4 enterprise, and the proposal is permissible with consent pursuant to the provisions of the Housing SEPP. The proposal includes over 1,700sqm of employment generating space across the concept that will contribute to the amenity of both future residents at the site and seniors living in the adjoining developments at Nos.5 and 7 Skyline Place.	Appendix 4 – Architectural Plans Appendix 4a – Concept Plans Appendix 4b – Reference Scheme
Built Form - Heights of proposed buildings are considerably higher than buildings opposite at 7 Skyline Place. - Reduce the height of Buildings B and C to better integrate with surrounding character	- See alternative massing scheme provided within the Design Report at Appendix 5. - The preferred scheme has considered other alternatives; however, the proposed scheme has been considered a superior outcome in terms of urban design and any off-site impacts. - The subject site has no applicable maximum HOB or FSR controls. - The proposal has been carefully designed according to well considered design principles to ensure the building heights, perceived bulk and scale is minimised through setting in upper levels and providing variation in heights across the site. - Given the site's size and location at the end of a cul-de-sac and adjacency to Warringah Road, it has minimal off-site material impacts. - Providing evenly dispersed, shorter towers across the site would reduce valuable communal open space and have a greater impact on the ability to retain trees. - Building envelopes fronting Frenchs Forest Road (Building D and part of Building E) have been reduced from 6 storeys to 5 to ensure cohesion	Appendix 4 – Architectural Plans Appendix 5 – Design Report

Issue	Response	Reference
Land and Environment Court reduce density for both 5 and 7 to an FSR of 1.93:1, yet the density proposed for 3 has an FSR of 2.66:1	- with the street character and minimise any perceived impacts to low density residential areas to the north. - All building envelopes at number 1 Skyline Place have been revised to provide recesses to break up the intended building form and ensure the detailed design can provide appropriate articulation. - Building E has been provided with increased breaks to articulate the two forms, which have different heights and lengths to reduce bulk. - The full length of the development fronting Warringah Road (Building C) provides protection and mitigates any impacts to the COS from winds and traffic noise.	
Construction - Parking of construction vehicles should be required to be on-site to not adversely impact the limited street parking - The impacts of construction traffic over the next 10 years have not been included and should be addressed - The narrow road presents a traffic hazard for large trucks - Concerns regarding noise	- A CTMP was submitted as part of the original EIS. The CTMP is to be implemented throughout construction and has been included as a Mitigation Measure accordingly. - Construction traffic matters for 1 Skyline Place will be assessed and addressed at the detailed DA stage.	Construction Traffic Management Plan submitted with EIS (Appendix 34)

Issue	Response	Reference
and dust during construction, particularly after poor management in the construction of 7 Skyline PI		
Affordable Housing - Affordable housing in 3 Skyline PI has been clumped together, suggest distributing across the whole precinct - Provision of affordable housing isn't enough to meet strategic objectives	- The proposal includes 5% affordable seniors housing. - Concentration within the site is practical for delivery and ongoing management and design and is often the preference of Community Housing Providers who manage a smaller proportion of units within a larger development. - There is no requirement for the proposal to include affordable housing, the 5% provision represents a meaningful contribution and ensures a delivery mechanism where none currently exists.	-
Procedural Matters		
Consultation Community engagement has been limited in information provided, hasn't occurred	- The project team undertook extensive consultation prior to lodgement including issuing letters, surveys and hosting a workshop at 1 Skyline Place on 11 December 2024. The workshop was hosted by the proponent, with Architect, Landscape Architect and Planner in attendance to answer any questions. - The team hosted a 1-hour and 3-hour webinar for community members to learn about the project.	Engagement Report submitted with EIS (Appendix 24)

Issue	Response	Reference
in a timely manner and has failed to consider concern of residents from prototype, initial concept living through further development of the site		
Lack of Regulatory oversight There was insufficient oversight of the construction of 5 & 7 Skyline Place causing adverse effects on neighbours during construction.	- This is a post-approval matter and any matters relating to the construction of 5 and 7 Skyline Place are not matters for consideration in the determination of this DA. - The Applicant understands that the conditions of consent, if granted, will include requirements which must be adhered to during the construction phase. - Any concerns in relation to construction management will be brought to the attention of the relevant construction manager, whereby contact details are signposted on construction fencing.	-
Community interest Development has negative environmental impacts which do not align with local and state objectives and legislation	- An Ecologically Sustainable Development (ESD) Report was submitted with the EIS. - The ESD Report confirmed that the proposal has implemented sustainability initiatives: - Minimises operational energy use through passive design and efficient building services and controls. - On-site generation of renewable energy - Utilising building materials with a lower embodied carbon. - Procurement of more responsible materials, including best practice PVC and low-VOC finishes.	Ecologically Sustainable Development Report submitted with EIS (Appendix 11)

Issue	Response	Reference
for climate adaptation and sustainable urban environments	○ Utilising 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.	
Economic, environmental and social impacts of the project		
Traffic • Carpark exists from 1 and 3 opposite those of 7 and 5, adding to traffic congestion and issue of turning right into Skyline Place • Traffic flow and congestions on Skyline Place which will occur because of the scale and density of the proposed development at 3 Skyline Place and in the future 1 Skyline Place.	• A TIA was submitted with the EIS which demonstrated that traffic generated from the proposal would have negligible impacts on the surrounding road network. • Further, a Traffic and Parking Matters Letter accompanies this response at Appendix 8, which provides an assessment utilising an increased traffic generation rate which continues to demonstrate that all surrounding intersections will operate at the same Level of Service as existing. • As above, a CTMP was submitted as part of the original EIS. The CTMP is to be implemented throughout construction and has been included as a Mitigation Measure accordingly.	• Appendix 8 – Traffic and Parking Matters Letter • Transport and Accessibility Impact Assessment submitted with EIS (Appendix 12) • Construction Traffic Management Plan submitted with EIS (Appendix 34)

Issue	Response	Reference
Project should require detailed traffic impact assessment and ensure mitigation measures are implemented		
The projected traffic flows post development have been significantly underestimated		
Construction vehicles impact on the traffic conditions in Skyline Place over the next 10 years, along with large vehicles going along narrow street		
Pedestrian Movement Pedestrian crossing of Skyline Place and Frenchs	- No crossings are proposed over public roads. - It is noted that a condition of consent was imposed on the DA for 5 Skyline Place, requiring a safe pedestrian crossing point be constructed between the east bound mid-block bus stop on Frenchs Forest Road and Skyline Place. - Notwithstanding, as per the Traffic and Parking Matters Letter at Appendix 8:	Appendix 8 – Traffic and Parking Matters Letter

Issue	Response	Reference
Forest Road East Proposed raised crossing on Skyline Place near the intersection may be better located further south due to increased traffic turning into Skyline Place	<i>Footpaths are generally provided on both sides of all roads in the vicinity of the site to encourage walking as an active form of transport.</i> <i>Sealed footpaths are provided on both sides of Skyline Place and Frenchs Forest Road East, with the pathway along the southern side of Frenchs Forest Road East comprising a wide shared pathway for cyclist and pedestrians.</i> <i>Key intersections with Frenchs Forest Road East also have signalised pedestrian crossings, thereby allowing pedestrians accessible pathway links to Skyline Shops and Northern Beaches Hospital.</i> <i>In addition, the proposed development provides accessible pathways, including along the internal access road, as well as providing a pedestrian crossing across Skyline Place.</i> <i>As such, no additional pathway links are required.</i>	
Safety - Existing and proposed safe evacuation assembly points have not been considered in the proposal. - Taller 14 storey buildings, create reduced mobility for senior community during an emergency	An access report prepared by Hontas Hatzi & Co. Pty Ltd was submitted with the original EIS. The Access Report confirmed that the proposed development is capable of compliance with all relevant Australian standards for access. Further details will be required to be provided in the as-constructed documentation post-approval.	-

Issue	Response	Reference
Wind Tunnel Concerns that the layout will create a wind tunnel along Skyline Place	- Sufficient setbacks have been provided to ensure wind tunnel effect is not created. - Further, the existing building at No. 4 Skyline Place aligns with the cul-de-sac to block any winds.	-
Environmental Impacts 50% of mature trees are to be removed – new planting will take time – and the loss of bird and animal life will be significant - Removal of deep soil zones is concerning	Although the proposal requires the removal of trees on site, the provision of trees at the site will significantly increase. The proposal requires the removal of 18 trees but will facilitate 124 new trees that will significantly increase the canopy coverage at the site and will also increase potential animal habitat.	Appendix 6 – Landscape Plans
Parking Off street parking for residential visitors and commercial patrons is insufficient. Not all commercial premises are tenanted	- The applicable parking provisions are contained under section 107 and 108 of the Housing SEPP which provide non-discretionary standards for car parking, specifying minimum rates. - In this instance, the Housing SEPP requires at least 247 spaces, and the provision of 283 car spaces is a minor exceedance of 36 spaces, equivalent to a 14.5% variation. - TfNSW's GTIA further stipulates 'Resident funded developments tend to have a higher per unit cost and attract residents with higher financial resources. The car ownership levels of such residents are likely to be relatively high, as is the associated traffic generation and parking requirements of these residents.' - Accordingly, the proposed parking aligns with the GTIA and has been designed to meet the demands of a resident funded development.	Appendix 8 – Traffic and Parking Matters Letter

Issue	Response	Reference
- The proposed allocation applies 0.5 spaces per bedroom. The experience with 7 Skyline Place is most apartments require 2 spaces. Residential parking insufficient. - Significant issues with little street parking and only 1 staff space allocated for RCF.		
Communal / Open Space There does not appear to be adequate greenspace and amenity space for the density proposed. The location of the 20 RACF does not allow for	- As demonstrated in the accompanying Landscape Plans, the proposal exceeds both minimum requirements for landscaped area and communal open space for the RAC and the ILUs. - The solar access and shadow diagrams within the Architectural Plans further demonstrate that the RAC receives adequate solar access from 11am onwards.	- Appendix 6 – Landscape Plans - Appendix 4 – Architectural Plans

Issue	Response	Reference
good sun and certainly not enough rooms for Ageing in Place.		
Solar Access - Light and solar impacts of height of buildings - Overshadowing diagrams do not indicate the effect on 7 Skyline Place	- As shown in the shadow diagrams within the Architectural Plans, the proposed buildings do not result in any undue overshadowing of surrounding sites given the careful siting of higher building forms. - No undue overshadowing will be cast over 7 Skyline Place given it fronts Frenchs Forest Road and is separated from 3 Skyline Place by the roadway. It is also noted that No. 7 is opposite the proposed 5 storey building at No. 3 which will unlikely result in shadows cast beyond Skyline Place. Detailed shadow diagrams will be provided as part of the future detailed DA for 1 Skyline Place.	Appendix 4 – Architectural Plans
Insufficient Aged Care Beds Strata units with no additional assistance for residents to transition to further care if required. The inclusion of 20-bed RAF is not large enough for potentially 1000's of seniors living in the complex	The RCF is being provided in accordance with the relevant provider. The provider has assisted in determining the size of the RCF and bed numbers, as well as the design.	-

Issue	Response	Reference
requiring additional care over next 20 years		
Visual Impact / Amenity - The views from 7 Skyline Place were rated as “moderate” although they will be dramatically altered and the proposal isn’t visibly similar in scale to its surroundings - The VIA states there will be “moderate to high” visual impacts on sensitive residential areas	- As per the updated Visual Impact Assessment: <i>The impact of the development would be moderate given the introduction of the scale and height along the eastern side of Skyline Place. The existing vegetation within site frontage provide an effective screen for the lower portion of the development.</i> - Additionally, the VIA presents so that maximum potential impact is shown by building envelopes on 1 Skyline Place, which is appropriate given the concept nature of the application for this part of the site. These envelopes show a greater level of impact than will result from the future buildings, which will be more articulated. The photomontages also do not show the dense landscaping proposed to all boundaries which will further soften the future buildings. - A VIA will be included with any future DA for the construction of buildings at 1 Skyline Place within the envelopes as proposed.	Appendix 7 – Visual Impact Assessment
Setbacks Providing a “green boulevard” along Skyline Place may have more impact if the	- The Stage 1 proposed development only interfaces with 3 Skyline Place at the head of the cul-de-sac. - A side setback of 12.6m is proposed where No. 1 (i.e. Concept plan building envelopes only at this stage) adjoins Skyline Place. This setback will ensure a positive outcome with the provision of a vegetated, green setback to soften the future built form.	Appendix 4 – Architectural Plans

Issue	Response	Reference
9m setback is increased		
Privacy Privacy issues for the residential aged care facility as the ground floor looks directly towards the external common area	- All ground floor units will have sight lines to common open space, providing for passive surveillance in line with ADG objectives. - This passive surveillance is a requirement of the operator as it will allow staff to monitor residents using the COS whilst tending to other residents inside.	-
Public Transport There will be increased population density causing strain on bus services	- Although there will be an increase in population, it is not anticipated that senior's residents will utilise public transport services in typical peak hours and cause a resultant strain on existing bus services. - There are several bus services offered along Frenchs Forest Road, with the closest bus stops located within 200m walking distance north of the site. - There are approximately 653 bus services per day within the vicinity of the site on weekdays and 549 on Saturday, and 513 on Sundays. - These bus routes primarily include connections to Chatswood, Manly and Warringah Mall, with lesser services connecting Frenchs Forest to Allambie Heights, Seaforth, Narrabeen, Dee Why and City (Wynyard).	- Transport and Accessibility Impact Assessment submitted with original EIS (Appendix 12) - Appendix 8 – Traffic and Parking Matters Letter
Increased visitors Increased foot traffic and residential population will lead to more people walking past nearby residential houses,	Although the proposal is likely to increase foot traffic on surrounding streets, this will be along public footpaths.	Transport and Accessibility Impact Assessment (Appendix 12)

Issue	Response	Reference
causing concern for safety		
Loss of Employment Removal of industrial land limits job opportunities and is inconsistent with zoning objectives	- The proposal is permissible within the zone pursuant to the provisions of the Housing SEPP and aligns with the objectives of the SEPP to provide for housing for seniors. - The sites will continue to provide over 1,700sqm of floor area for non-residential, employment generating uses to ensure alignment with the zone objectives - The Economic Impact Assessment provided with the original EIS confirms that the proposal is justified from an economic perspective as: - it aligns with state-wide planning strategies - it provides for both social and economic benefits through a modern alternative to typical retirement village arrangement - it aligns with objectives of the SP4 Enterprise zone in which it is located - it aligns with demonstrated demand for commercial floorspace in the locality - it reflects the evolving role of Business Parks within Greater Sydney	Economic Impact Assessment was submitted with EIS (Appendix 6)
Waste Management No commitment is made to restrict garbage collection to standard hours	- Residential waste will rely on Council collection for pick as detailed within the Operational Waste Management Plan (OWMP) submitted with the EIS: <i>Council will be engaged to collect the residential general waste, comingled recycling, paper/cardboard recycling and FOGO in accordance with Council's collection schedule. This report assumes that all waste streams will be collected twice weekly.</i> - For the non-residential uses, it is expected that a private commercial waste contractor will be engaged, as confirmed in the OWMP: <i>A private waste contractor will be engaged to service the commercial/retail general waste and recycling bins as per an agreed collection schedule. This report assumes that general waste is collected twice per week and recycling is collected twice per week.</i>	Operational Waste Management Plan submitted with EIS (Appendix 18)

Issue	Response	Reference
	Council pick up of residential waste will be during standard hours and it is considered the same for non-residential waste picked up by the private contractor.	

5 Updated project justification

This section includes an updated justification and evaluation of the project, incorporating any relevant issues raised in submissions and the response to these issues provided in Section 4 of this report. All matters have now been addressed as detailed within this report.

The project team has undertaken considerable further detailed analysis of the site composition and built forms to ensure that the proposal is appropriate in its context and maximises amenity for future residents.

The following amendments have been made or additional information supplied in line with submissions:

- Increased recesses are provided to building envelopes at number 1 Skyline Place to ensure the future detailed design will provide for articulation and a greater variety in building length and width that will provide diversity in built form.
- As above, the tower form of Building C has been reduced by one storey with the uppermost level provided with a 9m setback to number 49 Frenchs Forest Road to the site's immediate east.
- These proposed amendments significantly increase building articulation and are compatible with approved seniors housing buildings on the opposite side of Skyline Place, providing a compatible development outcome.
- Building envelopes which interface with Frenchs Forest Road have been reduced from 6 storeys to 5 storeys to reduce bulk and align with built form at the adjoining number 7 Skyline Place
- The proposed design changes seek to articulate the tower form through:
 - Increased setback to top floors to better express the upper levels of the building.
 - The 6 and 13 storey components of Building C are now presented as separate building elements, helping to reduce their perceived bulk and scale.
- Further height analysis of the surrounding locality has been prepared and presented in section in the Design Report at Appendix 5 to demonstrate how the proposal appropriately sits in context.
- The revised tower form sits comfortably within both the existing and future context of the locality noting:
 - The existing Northern Beaches Hospital sits has a height of 47m.
 - The Frenchs Forest Town Centre is subject to the following height limits:
 - 40m base height control, and
 - 52m (16 storey) including the +30% infill for affordable housing bonuses afforded through the Housing SEPP controls.
- Alternate massing analysis has been undertaken to show similar dwelling yields on the site in shorter, bulkier buildings, which resulted in significant overshadowing and loss of communal open space. The 4-6 storey and 6-8 storey schemes have been demonstrated to result in negative environmental outcomes.

This RtS is accompanied by updated technical inputs including a Detailed Site Investigation, Remediation Action Plan, Traffic and Parking Matters Letter, Noise and Vibration Impact Assessment, Landscape Plans, Visual Impact Assessment, evidence

of Aboriginal Heritage Consultation, an Unexpected Finds Protocol relative to Aboriginal heritage, and Natural Ventilation Assessment.

In addition, DCCEEW have revised Biodiversity Values mapping whereby the site is no longer identified as 'High Biodiversity Values'. The proposal therefore raises no issues regarding permissibility under the Housing SEPP and previously proposed mitigation measures relating to biodiversity have been removed from the mitigation measures at Appendix 2.

All of the above technical inputs and revisions demonstrate that the proposal provides for and results in a positive environmental outcome.

The application remains largely consistent with the justification as provided in the EIS as outlined below:

- **Strategic Alignment:** the proposal delivers a significant contribution to housing supply in line with the National Housing Accord and key regional and local planning priorities. By providing much needed seniors housing, the project not only meets a demonstrated and growing demand for seniors living units but will also free up detached housing for families, supporting the broader objective of housing choice and availability across the LGA. The proposal also enhances the role of the surrounding Health and Education Precinct by supporting local jobs and embedding residential uses that reinforce its strategic function.
- **Design response:** buildings are arranged in a perimeter block form to maximise separation, retain vegetation and deep soil, create landscaped areas with communal open space
- **Height and scale strategy:** Varied building heights provide transition to lower-density areas, with lower heights along Frenchs Forest Road and Skyline Place, taller forms located to minimise visual and amenity impacts, and articulated towers fronting Warringah Road to reduce bulk.
- **Accessibility and circulation:** pedestrian connections along Skyline Place and proposed internal road, supporting safe access and service/emergency vehicle movement.
- **Visual Impact:** The VIA confirms the development will have low to moderate visual impact in the short – medium term and is compatible with the evolving context, with respect to the Low and Mid-rise Housing controls applicable to sites surrounding the Town Centre and the Northern Beaches Hospital which will all be delivered in the long-term.
- **Statutory Compliance:** the proposal is largely consistent with the WLEP 2011 and permissibility is attained via the Housing SEPP, whereby the project is fully aligned with the objectives of the SEPP. The project exceeds ADG requirements for solar access, cross ventilation, landscaping and communal open space, while the updates made to the project address biodiversity, contamination, noise and traffic outcomes.

The design amendments and additional assessments have been undertaken in response to issues raised in submissions or further design development. No further adverse environmental, social or economic impacts have been identified because of the proposed development. As such, it is considered that the updated proposal addresses all concerns raised by agencies and the public and should be approved by DPHI.