

Environmental Impact Statement.

Proposed:

Redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential Care Facility, wellness hub, landscaping and car parking.

Subject Site:

Lot 71 DP 1160947
4-6 Popes Road, Woonona





Prepared by:

MMJ Town Planning & Advisory
G01/20 Belmore Street
Wollongong NSW 2500
PO Box W21
Wollongong West NSW 2500
02 4229 5555

Document Properties	
Author	L Turner
Job Number	J357
Project Name	SSD-73910208 – Seniors Housing - IRT Woonona
REAP	D Hoy
Date	10 July 2025

Acknowledgment of Country

MMJ acknowledges the traditional custodians of the land to which this Environmental Impact Statement applies. We pay our respect to all Aboriginal people of this land and to Elders past, present.

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Supporting Documentation

The following documents are referred to in this Environmental Impact Statement (EIS) and submitted as separate documents to support this application in accordance with the Department of Planning, Housing and Infrastructure's State Environmental Assessment Requirements (SEARs):

TABLE 1 – DOCUMENTATION TO SUPPORT THE DEVELOPMENT APPLICATION

App.	Description	Author
A.	SEARs Compliance Table	MMJ
B.	Clause 4.6 Variation Statement	MMJ
C.	Aboriginal Cultural Heritage Assessment Report	Austral
D.	Access Report	ABS
E.	Arboricultural Impact Assessment	Allied Trees
F.	Architectural Design Method & Approach and Architectural Drawings including: <ul style="list-style-type: none"> • Public Space Plan • Shadow Diagrams 	Calderflower
G.	BASIX Certificate	Credwell
H.	BCA Compliance Statement	BM+G
I.	Biodiversity Development Assessment Report (BDAR)	Eco Planning
J.	CPTED	MMJ Town Planning
K.	Architecture Design Report	Calderflower
L.	SDRP Response Report & Conformance Reports	Calderflower
L.(1)	ADG Conformance Table	Calderflower
L.(2)	Senior Design Guide Conformance Table	Calderflower
M.	Detailed Site Investigation	Soilsrock
N.	Ecologically Sustainable Development Report	Credwell
O.	Community Engagement Report	Brookes
P.	Estimated Development Cost	MBM
Q.	Flood Emergency Response Plan	Watertech
R.	Flood Impact Assessment	ACOR
S.	Geotechnical Report/ Hydrogeological Report	Soilsrock
S.(1)	Hydrogeological Assessment Report	Soilsrock
S.(2)	Additional Geotechnical Site Investigation Report	Soilsrock
T.	Hazardous Material Survey	Reditus
U.	Landscape Concept Plan	Arcadia
U. (1)	Landscape Report	Arcadia
U. (2)	Canopy Coverage	Arcadia
V.	Noise and Vibration Impact Assessment	Acoustic Logic
V.(1)	Demolition Noise and Vibration Management Plan	Acoustic Logic
W.	Pedestrian Wind Environment Assessment	SLR
X.	Preliminary Hazard Analysis	Riscon
Y.	Preliminary Site Investigation	Douglas Partners



Z.	Services Availability Review	JN Consulting Engineers
Z.(1)	Hydraulic and Wet Fire Infrastructure Report	JN Consulting Engineers
AA.	Shelter in Place Strategy	Watertech
BB.	Social Impact Assessment	GYDE
CC.	Statement of Heritage Impact	Weir Phillips
DD.	Stormwater Concept Plan. Sediment and Erosion Control Plans	ACOR
DD.(1)	Stormwater Management Report	ACOR
EE.	Surface and Groundwater Impact Assessment	Soilsrock
FF.	Survey Plan	Orion
GG.	Transport and Accessibility Impact Assessment (including Green Travel Plan and Construction Traffic Management Plan)	Stantec
HH.	Urban Design Report	Urbanac
II.	View analysis, Visual analysis and Visual Impact Assessment	Urbaine
II.(1)	Visual Impact Assessment - Appendix A	Urbaine
JJ.	Waste Management Plan - Construction and Operational	Elephant's Foot
KK.	Water Management Plan	ACOR
LL.	Owner's Consent	IRT Group
MM.	Mitigation Measures	MMJ



Signed Declaration

Project Details	
Project Name	IRT Woonona - Redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing residential care facility, wellness hub, landscaping and car parking.
Application Number	SSD-73910208 - Seniors Housing - IRT Woonona Redevelopment
Land to be Developed	4-6 Popes Road, Woonona (Lot 71 DP 1160947)
Applicant Details	
Applicant Name	Illawarra Retirement Trust (IRT) Group (Registered Community Housing Provider)
Applicant Address	3/77 Market St, Wollongong NSW 2500
Prepared By	
Author	Lauren Turner
Qualifications	B Urb Reg Plan, RPIA
Address	MMJ Town Planning G01, 20 Belmore Street Wollongong, NSW 2500
Registered Environmental Assessment Practitioner (REAP)	
REAP	David Hoy #4459
Qualifications	Bachelor of Urban and Regional Planning (UNE) Master of Commerce (Land Economy) (WSU) Registered Planner +EIA
Address	Urbis Level 8 Angel Place 123 Pitt Street Sydney NSW 2000
Declaration	
The undersigned declares that this EIS:	<ul style="list-style-type: none"> • has been prepared in accordance with the Environmental Planning and Assessment Regulation 2021; • contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the EIS relates; • does not contain information that is false or misleading; • addresses the Planning Secretary's environmental assessment requirements (SEARs) for the project;



- identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments;
- has been prepared having regard to the Department's State Significant Development Guidelines - Preparing an Environmental Impact Statement;
- contains a simple and easy to understand summary of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development;
- contains a consolidated description of the project in a single chapter of the EIS;
- contains an accurate summary of the findings of any community engagement; and
- contains an accurate summary of the detailed technical assessment of the impacts of the project.

Signature

Date

23rd July 2025

Executive Summary

This Environmental Impact Statement (EIS) has been prepared by MMJ Town Planning on behalf of our clients IRT Group in support of a State Significant Development Application (SSDA) to be submitted to the Department of Planning, Housing and Infrastructure (DPHI), seeking consent for the proposed redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing residential care facility, wellness hub, landscaping and car parking at Lot 71 DP 1160947, 4-6 Popes Road, Woonona (hereafter referred to as the subject site).

Development for the purposes of seniors housing with a capital investment value of more than \$30 million is identified in Schedule 1, Section 28 of *State Environmental Planning Policy (Planning Systems) 2021* and is therefore declared to be State Significant Development (SSD) for the purposes of the Environmental Planning & Assessment Act 1979 (EP&A Act).

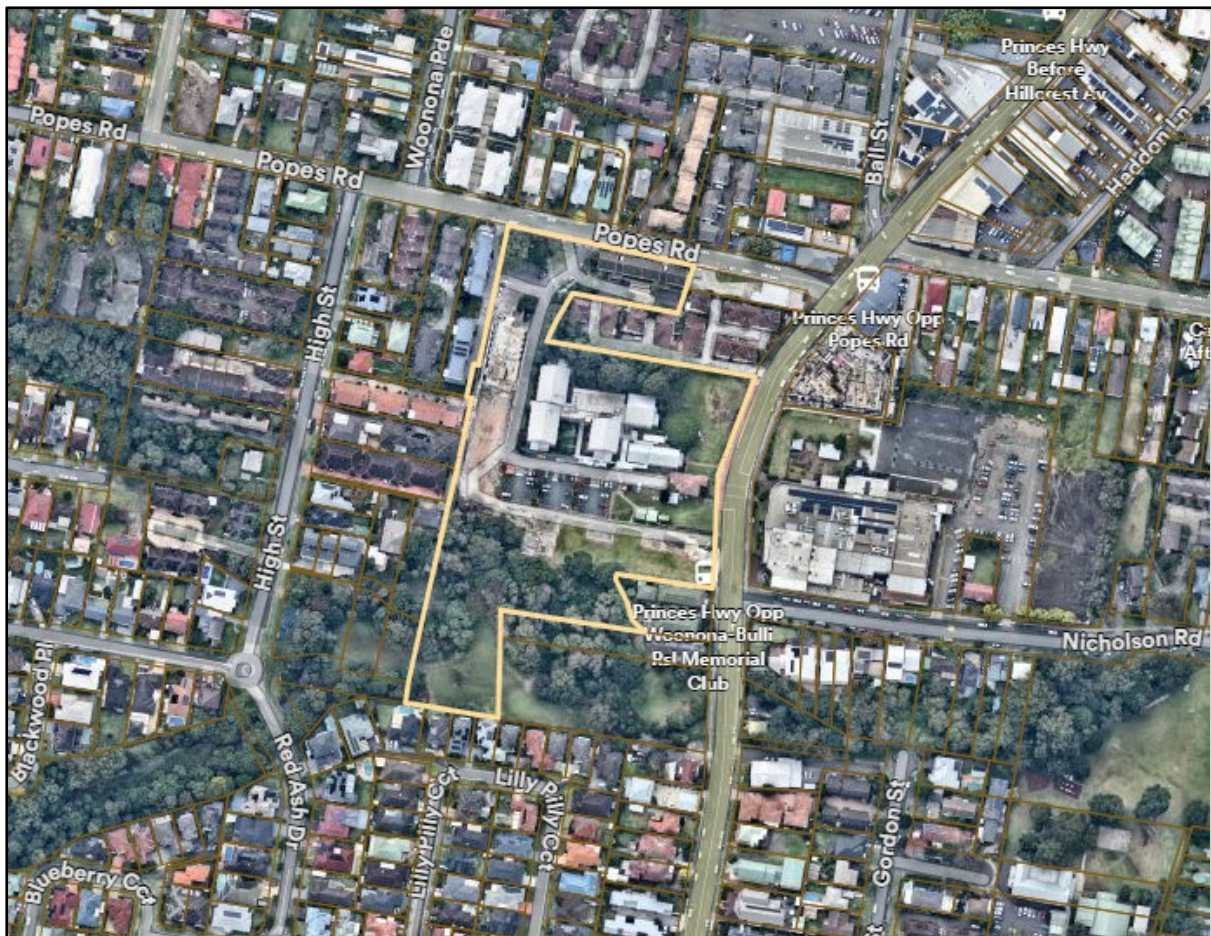


IMAGE 1 – AERIAL IMAGE OF SUBJECT SITE – 6 JUNE 2025 (SOURCE: NEARMAP)



The subject site is located southeast of the Woonona town centre, on the northeastern border of Gahans Park, and connects to the southern side of Popes Road and western side of Princes Highway.

Background

IRT Woonona is in the coastal suburb of Woonona, within the northern region of Wollongong Local Government Area. The subject site is nestled between the Illawarra escarpment and the ocean. Currently the site operates as an IRT retirement village and IRT has initiated a desire to upgrade the facilities to enhance the resident's experiences.

The objective of this project is to redefine the possibilities of a retirement village, intertwining the spaces with the adjoining riparian zones with semi-public and private spaces. The outcome of the project is to create fantastic user experiences, focused on resident and visitor experiences.

The Proposal

The development proposes redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential Care Facility, wellness hub, landscaping and car parking.

The SSDA proposes to undertake the following works:

1. Construction of five (5) seniors housing buildings comprising a total of 98 dwellings:
 - Building A - 16 Independent Living Units
 - Building B - 8 Independent Living Units
 - Building C - 27 Independent Living Units
 - Building D - 32 Independent Living Units
 - Building E - 15 Independent Living Units and Social Wellness Centre
2. New basement level and at-grade car parking for 182 spaces, internal roads and ancillary infrastructure
3. Additions to the existing Flametree Residential Care Facilities (RCF) and connection to the basement car park.
4. Demolition of internal road networks and existing car parking, to be replaced in new proposed basement.
5. Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide a cafe and staff amenities.
6. Retention of existing Camelia Lodge Independent Living Units.
7. Landscaping and vegetation management in the riparian corridor.

8. Temporary Vehicle Access from Princes Highway during construction for construction vehicles and to service Flametree through stages of construction.

The aerial map dated 6 June 2025 (Image 1) extracted from Nearmap illustrates the demolition works that have been completed to date with Blueberry Ash ILUs and Ribbonwood RCF partially demolished (Council DA Ref DA-2023/808).

The proposal is detailed in the architectural drawings prepared by Calderflower, supporting documentation and described in this EIS. Images 2-4 below include perspectives of the proposed seniors housing development.



IMAGE 2 – VIEW FROM PRINCES HIGHWAY TOWARDS HERITAGE AND APARTMENT BUILDINGS D AND E (CALDERFLOWER)



IMAGE 3 – VIEW FROM SOUTH WEST OF SITE TO PORTE-COCHERE AND VEHICLE DROP OFF (CALDERFLOWER)



IMAGE 4 – VIEW TO BUILDING C, PORTE-COCHERE AND VEHICLE DROP OFF (CALDERFLOWER)

Analysis of Alternatives

The proposed development involves redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing residential care facility, wellness hub, landscaping and car parking. During the design process, alternative options were explored:

- **Do Nothing:** Leaving the site as is would result in continued underutilisation, with outdated and deteriorating buildings, failing to address the need for renewal or contribute to the area's requirement for seniors housing diversity and growth. Given the age of existing buildings on site and staging of the redevelopment, development consent was issued by Wollongong City Council for the demolition of existing Independent Living Units and the Ribbonwood Residential Care Facility which is underway.
- **Alternative Purpose:** Other potential uses for the site were considered but deemed less suitable given the site's existing zoning, location and use as a seniors housing development and to continue to provide housing for seniors and existing residents.



- Alternative Design: An Urban Design Analysis (**Appendix HH**) was undertaken by Urbanac to ensure the development is efficiently designed to complement the site's features and limit the impact of the site constraints. The site is heavily constrained by watercourses, flooding and overland flow paths, riparian vegetation and with vehicle access via the Princes Highway being limited. Consideration of existing access to and from retained buildings, operational continuity, conservation and adaptive reuse of the site's heritage item, its curtilage, and the view corridor to Woonona and the escarpment is required.

Redevelopment of the buildings on the western and southern edges of the site are considered key development outcomes as these developments have reached an age where they no longer meet IRT requirements.

The constrained nature of the site limited the number of practical footprint options for the site. Two primary footprint options have been considered:

Option 1, a streetscape approach, building to the street alignment. This resulted in a more formal lawn in front of the heritage item that was not authentic to its interpretation and visually separated the former church from the Woonona township.

Option 2, a view corridor approach, maintaining a visual connection between the Woonona township and former church through to the escarpment beyond. This results in a less formal public open space in front of the former church.

Option 2 was preferred for reasons including:

- Council indicated a strong preference for the preservation of the existing view corridor as an important heritage consideration
- Visual connectivity between the Church and the Woonona township was considered a more authentic heritage response for the former church
- Informal opening of the site to the street as a key design principle to better integrate retirement living with public life (rather than out-dated approaches which tend to be isolated and gated)
- The option provided for improved connectivity between the high visual value riparian vegetation and new development
- The streetscape space could still be appropriately framed by the eastern frontage of the northern building

The Urban Design Study prepared by Urbanac considered various design response options in the master plan development phase. Three approaches were considered for the relationship between Princes Highway frontage and streetscape as well as the R2 western interface with the development – see Images 5 and 6 below.



Three height massing options have been considered for the preferred footprint option as detailed in Urbanac's Urban Design Analysis:

Option 1 looks at delivering building massing with heights derived from the LEP, together with the height bonuses from the Housing SEPP.

Option 2 looks at lowering the streetscape massing to achieve 2-3 storey forms, and to rebalance that potential with taller forms interior to the site.

Option 3 looks at a middle approach, with a unified height of 4 storeys for new built form across the site (and a 3-4 storey form for the western linear buildings to maintain the existing interface condition).

Option 3 was preferred for reasons including:

- For Option 1, a lower height was considered preferable despite the controls in the northern part of the site, to better relate to the Woonona Township
- Option 2 intent could be more successfully delivered by well-articulated streetscape buildings, plus it led to LEP non-compliances in the site interior
- Option 3 was considered best able to provide a coherent approach to development on the site, allowing an architectural design solution rather than a planning envelope solution to manage scale relationships.

Height and Streetscape

Three massing approaches were considered for building height along the Princes Hwy:

Approach 1 delivers building massing with heights derived from the LEP together with the height bonuses from the Housing SEPP.

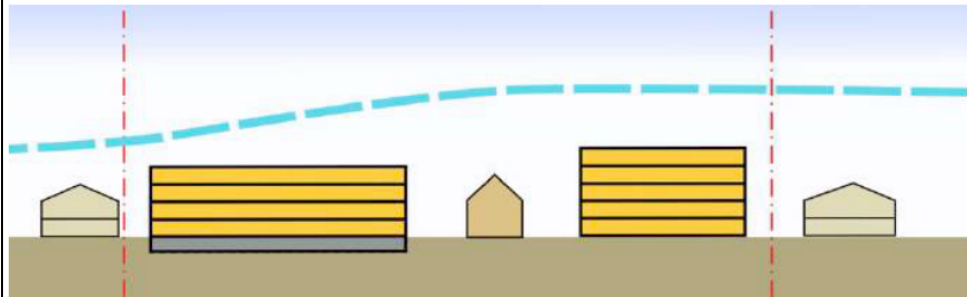


Figure 30 Height Option 1 North-South Section Diagram

Approach 2 lowers the streetscape massing to achieve a 2-3 storey forms, and to rebalance that potential with taller forms interior to the site.

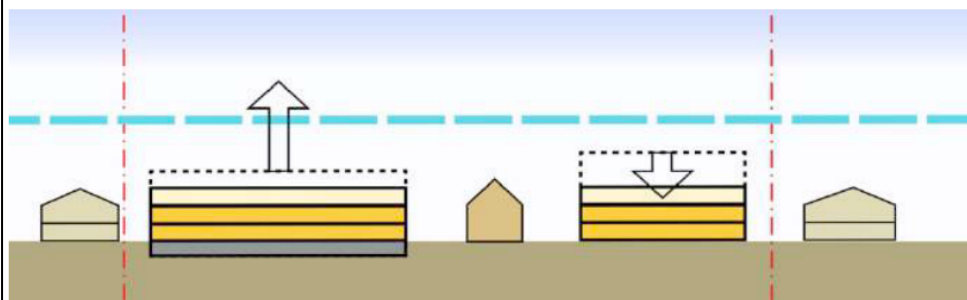


Figure 31 Height Option 2 North-South Section Diagram

Approach 3 looks at a middle approach, with a unified height of 4 storeys for new built form across Princes Hwy frontage of the site – lower in the north and at the maximum height for the south resulting in an overall scale transition.

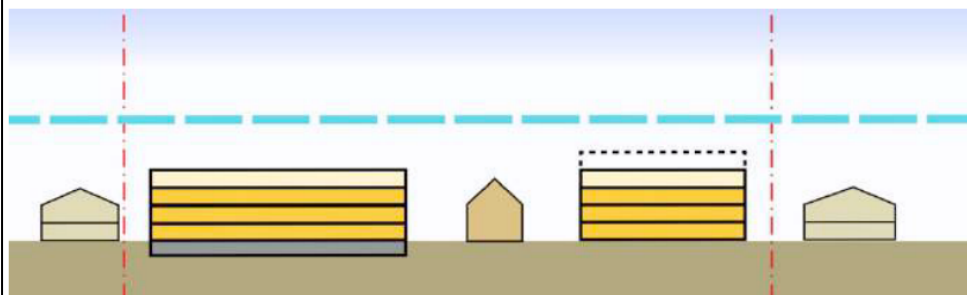


Figure 32 Height Option 3 North-South Section Diagram

IMAGE 5 – HEIGHT AND STREETScape OPTIONS PRINCES HIGHWAY INTERFACE (URBANAC)

Height and R2 Western Interface

Three massing approaches were considered for building height at the interface to the R2 residential zone to the west:

Approach 1 delivers building massing with heights derived from the LEP together with the height bonuses from the Housing SEPP and ADG 3F-1 building separations.

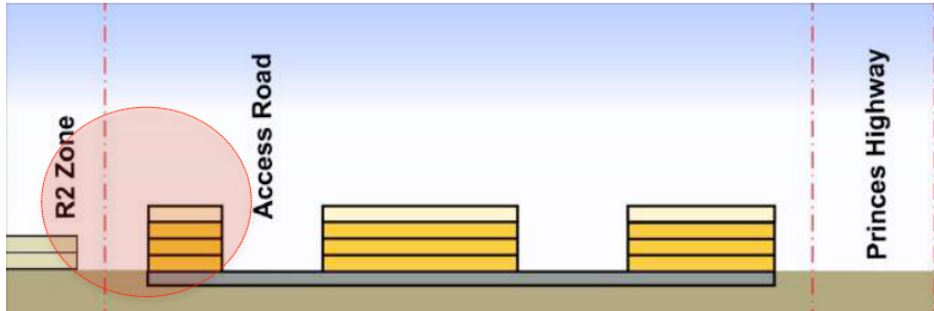


Figure 33 Height Option 1 North-South Section Diagram

Approach 2 steps heights to the west to present a smaller rise in storeys along the western edge.

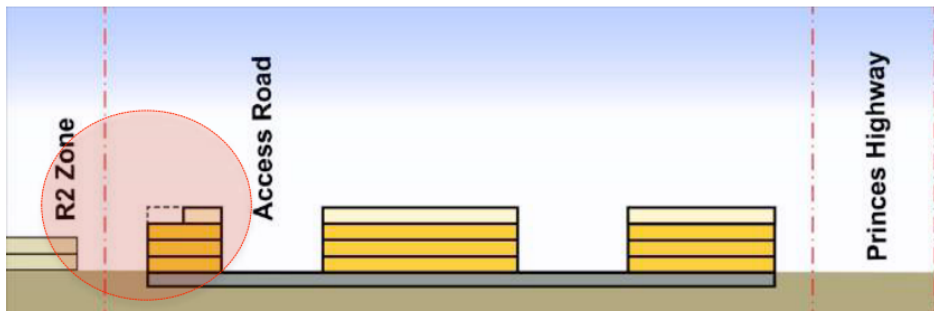


Figure 34 Height Option 2 North-South Section Diagram

Approach 3 is an integrated approach, which positions the internal vehicle access roadway west of these building masses to maximise separations to the R2 zone, while utilising the maximum height available under the controls

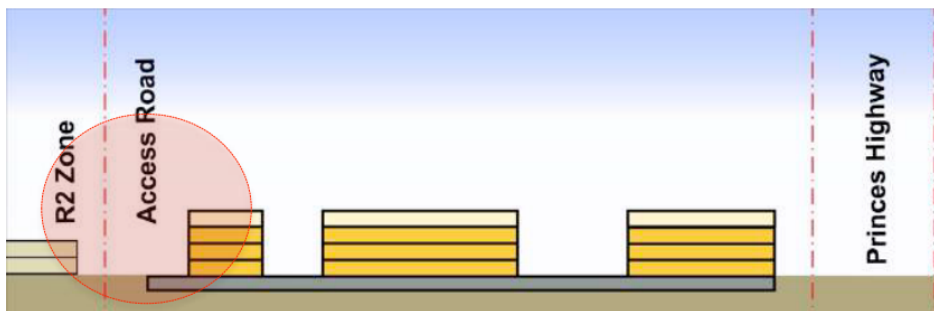


Figure 35 Height Option 3 North-South Section Diagram

IMAGE 6 – HEIGHT AND STREETSCAPE OPTIONS R2 WESTERN INTERFACE (URBANAC)



Planning Secretary's Environmental Assessment Requirements

On 5 August 2024, the Department of Planning, Housing & Infrastructure issued the Planning Secretary's Environmental Assessment Requirements (SEARs) for the Seniors Housing - IRT Woonona Redevelopment (SSD-73910208). Industry-specific SEARs have been issued for the project along with the following additional assessment requirements:

The Department has identified assessment requirements additional to those attached. These requirements, in addition to the industry-specific SEARs, are provided below and should be taken to be the collective SEARs for the project.

- The detailed flood impact and risk assessment, in addition to the requirements in the industry-specific SEARs, must consider the following:
 - The management of flood risk for the full range of flooding up to and including the Probable Maximum Flood (PMF).
 - Any impacts of climate change.
 - Any evacuation and shelter-in-place requirements/procedures with consideration of the Draft Shelter-in-place Guideline.
- Demonstrate that the proposal will meet the site-related requirements in Division 4 of State Environmental Planning Policy (Housing) 2021.

This EIS provides an assessment of the environmental impacts of the proposal in accordance with the issued SEARs, additional assessment requirements and sets out the undertakings made by IRT Woonona to manage and minimise potential impacts arising from the development.

Strategic Context

The Illawarra-Shoalhaven Regional Plan

The proposal is considered to be generally consistent with the objectives of the Illawarra-Shoalhaven Regional Plan 2041. The proposal is generally consistent with the following objectives and strategies within the ISRP 2041:

Objective 18 – Provide housing supply in the right locations.

The Regional Plan identifies West Lake Illawarra, Nowra-Bomaderry and Bombo Quarry as growth areas. Aside from these areas, the Plan concentrates new development and intensive uses in existing centres, rather than in the scenic hinterland that defines the coastal rural character of the region. The proposal is consistent with the objective of being wholly contained within an existing residentially zoned parcel, with an existing use as a seniors housing development. The site is a suitable location being within close walking distance to Woonona Town Centre and a bus stop is located directly at the frontage of the site.



Objective 19 – Deliver housing that is more diverse and affordable

The proposal generally aligns with Objective 19 by provide a mix of housing types by delivering a diversity of housing types and sizes in an accessible location. The proposal will deliver 98 independent dwelling units consisting of four (4) x one (1) bedroom, forty-four (44) x two (2) bedroom and fifty (50) x three (3) bedroom units throughout five (5) apartment buildings.

Objective 23 – Celebrate, conserve and reuse cultural heritage

The proposal generally aligns with Strategy 23.1 – *Undertake heritage studies early to inform conservation and value add opportunities and apply adaptive reuse and heritage interpretation to create distinctive local places.*

It is acknowledged that the original inhabitants of the Illawarra, Wollongong Harbour and coastline are the Dharawal people. An Aboriginal Cultural Heritage Assessment was undertaken for the proposal by Austral Archaeology. The background research found the study area has low archaeological potential due to significant ground disturbance caused by the construction of buildings, amenities, roads and landscaping within the highly developed urban areas of the site. During the site inspection, a culturally modified scar tree, outside of the scope of the works was recorded in the study area (AHIMS #52-2-4988). This scarred tree was registered as an Aboriginal site as per the request of the Representative Aboriginal Parties (RAPs) present during the investigations and has been recommended any future works should avoid the culturally modified scarred tree and the areas of moderate archaeological potential in the south of the study area.

The site contains a heritage item ('Former Woonona Uniting Church') and lies within the vicinity of other heritage items listed by Schedule 5 Part 1 of the LEP 2009. The heritage item on the site will be retained. The proposed adaptive re-use will help to conserve the heritage significance of the 'Former Woonona Uniting Church' by giving it a viable use that will raise the necessary funds for its long-term maintenance. The proposed restaurant use requires minor alterations that are confined to areas that have already undergone change, or are not readily visible. The fit-out will be minimally fixed into stud walls and will be easily reversible. Significant fabric including tiled floors and timber lined ceilings will be retained. The new kiosk and pavilion will present as visually subordinate in scale and materiality to the retained heritage item.

Illawarra Escarpment Strategic Management Plan 2015

This State Significant Development Application is generally consistent with the Planning Principles contained within the Illawarra Escarpment Strategic Management Plan (2015) (IESMP 2015) and Illawarra Escarpment Lands Urban Review Strategy (2007). The proposal is consistent with the objective being wholly



contained within an existing residentially zoned parcel, with an existing use as a seniors housing development. A Visual Impact Assessment from Urbaine Design reveals view loss experienced by observers varies from Nil to Moderate-to-Severe. This is largely due to the topographical undulations of the area, relative to the high-value views - to the ocean in the east and the Illawarra Escarpment in the west. The visual impact is, inevitably, greater, at close proximity, without the landscape screening of the buildings, particularly at their upper levels. However, when seen within the context of the variety and scale of existing buildings within the town centre, the overall visual impact can be deemed acceptable.

Wollongong Housing Strategy 2023

As the population ages the proportion of housing required for seniors also increases. Wollongong is fortunate to have a number of quality providers of aged care accommodation, who provide self-contained units and residential care facilities (nursing homes). The planning controls for seniors living is managed by the State through SEPP (Housing) 2021. Council's role is to assess development applications.

The proposed redevelopment will provide for renewed and additional aged care accommodation consistent with the strategy. This application is a State Significant DA and therefore the Department of Planning, Housing and Infrastructure (DPHI) is the consent authority, and not Council in this instance.

Wollongong Retail and Business Centres Strategy

Seniors housing near Woonona town centre aligns with the Wollongong Retail and Business Centres Strategy by fostering a vibrant, mixed-use environment. It enhances accessibility for seniors and people with a disability to shops, services, and transport, supporting their independence. This type of housing also bolsters the local economy by increasing the nearby residential population, which supports Woonona's businesses. Furthermore, it contributes to housing diversity within a well-serviced local centre, consistent with strategic goals for accessible and thriving community hubs. The development provides some commercial activity on site, such as a café/kiosk and a wellness hub that provides goods and services to the residents and community without detracting from the Woonona Town Centre.

Statutory Context

The site is zoned R2 Low Density Residential and E3 Productivity Support under the Wollongong Local Environmental Plan 2009 (WLEP 2009). The key LEP objectives for the R2 and E3 zones are:

- To provide for the housing needs of the community within a low-density residential environment.
- To enable other land uses that provide facilities or services to meet the day-to-day needs of residents.



- To provide a range of facilities and services, light industries, warehouses, and offices.
- To provide for land uses that are compatible with, but do not compete with, land uses in surrounding local and commercial centres.
- To maintain the economic viability of local and commercial centres by limiting certain retail and commercial activity.
- To provide for land uses that meet the needs of the community, businesses, and industries but that are not suited to locations in other employment zones.
- To provide opportunities for new and emerging light industries.
- To enable other land uses that provide facilities and services to meet the day-to-day needs of workers.
- To sell goods of a large size, weight, or quantity or to sell goods manufactured on-site.
- To allow some diversity of activities that will not significantly detract from the operation of existing or proposed development or the amenity enjoyed by nearby residents, or have an adverse impact on the efficient operation of the surrounding road system.

The proposal (seniors housing) is permissible with consent in the R2 zone and seniors housing is permitted in the E3 zone under Section 81 of the State Environmental Planning Policy - Housing 2021 (Housing SEPP).

The key SEPP objectives are to increase the supply and diversity of seniors housing across the State and the proposed development facilitates an increased of supply and upgrade of seniors housing.

This State Policy encourages more diverse forms of seniors housing than may be permitted in council LEPs to meet the needs and expectations of an ageing population. This application is proposing a diversity of seniors living options, including independent living units (ILUs) comprising 1, 2 and 3 bedroom units in various sizes and layouts, and alterations/additions to existing Residential care facility , wellness hub.

The proposed social wellness centre can be broadly characterised as being an ancillary use to the seniors housing group term providing additional services to residents on site. Division 10 Health Services Facilities of *State Environmental Planning Policy (Transport and Infrastructure) 2021* permits medical centres (health services facility) in the R2 and the E3 zone as *prescribed zones*.

The subject site allows a maximum building height of 9m and 11m under Clause 4.3 of WLEP. The Housing SEPP increases the permitted height of building by 3.8m as a bonus height provision in Subsection 87(2) to 12.8m in the R2 zone and by 3.8m to 14.8m in the E3 zone.



The subject site allows a maximum floor space ratio of 0.5:1 under Clause 4.4 in the WLEP. Subsection 87(2) of the Housing SEPP adds a 25% bonus for seniors housing developments including a maximum FSR of 0.625:1 for development. The Housing SEPP also provides a non-discretionary standard of 1:1 for residential care facilities and 0.5:1 for independent living units.

The site contains the locally listed heritage item “Former Woonona Uniting Church” at the centre of the site. There are also heritage items in the vicinity including:

- Heritage item #6195 “Woonona Post Office”
- Heritage item #6194 “Woonona Industrial Co-operative Society”
- Heritage item #6502 “Woonona Bulli School of Arts”.

The site contains a mapped watercourse to the south of the site. This watercourse is also mapped as a Hydroline in the Hydroline Map under the Water Management (General) Regulation 2018.

The site is located within an existing residential/commercial area and accordingly, is already serviced by public utility infrastructure (i.e. power, water, sewer, gas, telecommunications, and the like).

Engagement

AMC Architecture were engaged to assist in the initial master planning of the site and the proposed development in early 2023. This important early work helped to establish design and development parameters for the site and to enable early consultation with Council and other external agencies. The AMC Masterplan from August 2023 is included in Image 7.

IRT WOONONA MASTERPLAN STUDY

6-8 POPES ROAD, WOONONA, WOLLONGONG

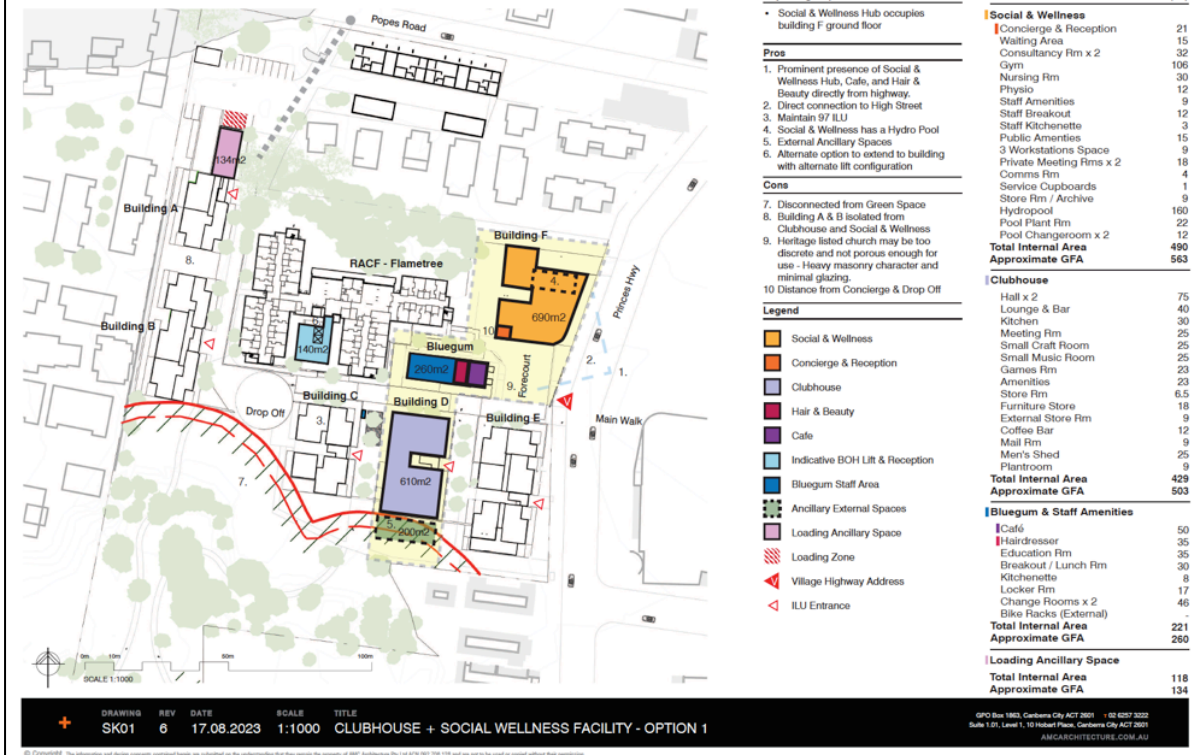


IMAGE 7 – AMC MASTERPLAN AUGUST 2023

Consultation with Council

Council was formally consulted in relation to the initial master planning work in August 2023. Key urban design issues raised by the Council included:

- A Desire to manage streetscape heights to achieve compatibility with the Woonona township
- Key heritage visual relationships between the Woonona township, the former church on the site and the distant views to the escarpment beyond
- Advice that access via Princes Highway would not be supported
- Management of riparian and flooding issues
- Management of interfaces to the adjacent dwellings in the R2 zone to the west.

Urban Design

Urbanac was brought into the project team in late 2023 to further refine the urban design aspects of the design, to help in the design selection process and to advise on urban design matters as the design was developed.



Competitive Design Selection

As part of its tendering process, IRT selected its architectural consultant based on a competitive design selection process. Three architectural firms were asked to present a design conceptual approach for the proposal as part of the tender response. The three firms were:

- AMC Architecture
- Gardner Wetherill and Associates (GW)
- Edmiston Jones Pty Ltd

Presentations by tendering architects took place by video between 1 and 16 November 2023.

Edmiston Jones was selected to undertake the remainder of the architectural design for the proposal based on their design conceptual approach. Further detailed design undertaken by Edmiston Jones and presented to the State Design Review Panel. Calderflower Architects were engaged to prepare the architectural plans for the amendments to the Residential Care Facility given their specific expertise in seniors housing projects and were appointed as the project Architects for the whole site to finalise the architectural concept and detailed design.

Council Design Review Panel

IRT, MMJ Planning, Edmiston Jones and Urbanac presented an updated pre-lodgement design to the Wollongong Design Review Panel in January 2024.

Key issues raised by the DRP include, but were not limited to:

- Support for the central pedestrian spine
- Support for a forecourt for the former church
- Support for the extended riparian zone to Collins Creek and opportunities to allow occupants to interact and view this high-quality landscape
- A recommendation to undertake a view analysis given the issues around heritage visual relationships between the Woonona township and the site's heritage item (this work was subsequently completed in early 2024 and will form part of the SSD DA)
- Further design work to develop a variety of high-quality communal spaces in and around buildings to supplement the more formal linear spaces
- Manage potential flooding issues for the site
- Consider opportunities to link to and connect to the public open space of Gahans Park at the south of the site.

Brooks Community Engagement

BROOKS Community Engagement (BROOKS) has been engaged by IRT Group to provide comprehensive community engagement services for the proposal.



Impacts of construction, and the overall public perception of the development, are the key focus areas for the proposal. As such, engagement has aligned with IAP2 best practices by utilising the Spectrum of Engagement to effectively inform and consult the community throughout the course of the development.

The strategy prioritises transparency by sharing information, actively listening to the community, delivering clear communication, and engaging proactively with the Woonona community. The goal is to keep the community well-informed throughout the development process and ensure awareness of the social and wellness centre that will be provided to the broader community.

BROOKS aimed to effectively connect with both neighbouring residents and the wider Woonona community in the project. This was and will be achieved with the following engagement methods: strategic communications, one on one consultations, creation and distribution of a community information letter, hosting community Drop-In Information Sessions, and providing a platform for open dialogue between the engagement team and the community.

The facilitators have worked closely with the community through face-to-face engagement. BROOKS have created opportunities for stakeholders to provide their feedback, seek out information, and proactively address and rectify any misconceptions surrounding the redevelopment of the Seniors Living Community. With regular, accurate, and transparent communication, BROOKS will play an important role in building and maintaining the community's trust for the project.

Assessment of Impacts

The key issues identified may have a significant impact on the site and locality of Woonona. An assessment of those relevant issues and the mitigation measures required to avoid, mitigate and/or offset the impacts of the project are outlined under the Assessment of Impacts. The key impacts of the development include:

- Design Quality and Built Form
- Flooding and Water Management
- Biodiversity and Vegetation Management
- Visual Impact
- Transport and Accessibility
- Noise and Vibration
- Social Impact
- Heritage Incentive Provisions

This EIS is supported by Architectural Plans prepared by Calderflower and technical supporting documents. Other environmental impacts and mitigation measures of the proposal are summarised in the table below. Please refer to the supporting documents for detailed environmental assessment.



Conclusion and Justification

Having regard to environmental, economic, and social considerations, the carrying out of the proposal is justified for the following reasons:

- The proposed development is permissible with consent and meets the relevant statutory requirements of the relevant environmental planning instruments, including the Wollongong LEP 2009;
- The proposal will facilitate the redevelopment of the site for the purposes of seniors housing, which will deliver important social and economic benefits to the community by contributing to housing supply, diversity and affordability for the increasing elderly population;
- The proposal is for seniors housing that will allow for existing and future residents to age in place with services and facilities on site to meet the needs of the community;
- The proposed contemporary and modern built form and urban design will significantly improve the quantity and quality of seniors housing stock within the Wollongong LGA and Woonoona local area;
- The proposal is of a high-quality architectural design that provides a contextual response to the immediate area and will contribute to a safe, secure and active environment;
- The proposed development is consistent with the aims and objectives of the relevant strategic planning framework, particularly the Illawarra Shoalhaven Regional Plan, by increasing the supply and diversity of seniors housing commensurate with forecast demand within the region;
- The proposal represents a significant investment opportunity in co-located seniors housing development and will also deliver approximately 427 full-time equivalent construction jobs, including 190 direct construction jobs, and when the project is complete and fully operational, it will support 80 direct ongoing jobs with 11 additional jobs created by the future development during operational phase as advised by IRT Group;
- During construction, the proposed development will support significant economic activity, with an estimated additional \$122M direct investment into the local economy and with an estimated \$98.5M in value added output to the local and regional economy. Once completed, the ongoing operations of the project will support \$25.4M in value-added output each year to the local and regional economy;
- The proposal will facilitate the delivery of new landscaped areas, tree planting and public domain spaces, with consideration and protection of existing heritage and biodiversity;
- The proposed development will not result in adverse environmental impacts, with appropriate mitigation measures that will minimise any potential impact;
- The proposal is consistent with the principles of ecological sustainable development as defined by Section 193 of the Environmental Planning and Assessment Regulation 2021; and
- The proposed development is suitable for the site and in the public interest.



Introduction

This Environmental Impact Statement (EIS) has been prepared by MMJ Town Planning on behalf of our clients IRT Group in support of a State Significant Development Application (SSDA). The application is submitted to the Department of Planning, Housing and Infrastructure (DPHI), seeking consent for the proposed redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential care facility , wellness hub, landscaping and car parking at Lot 71 DP 1160947, 4-6 Popes Road, Woonona (hereafter referred to as the subject site).

Development for the purposes of seniors housing with a capital investment value of more than \$30 million is identified in Schedule 1, Section 28 of *State Environmental Planning Policy (Planning Systems) 2021* and is therefore declared to be State Significant Development (SSD) for the purposes of the Environmental Planning & Assessment Act 1979 (EP&A Act).

The subject site is located southeast of the Woonona town centre, on the northeastern border of Gahans Park, and connects to the southern side of Popes Road and western side of Princes Highway.

This EIS has been prepared in accordance with the requirements of Part 4 of the EP&A Act, clause 175 of the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation), and the issued SEARs. This EIS should be read in conjunction with the supporting information and plans appended to and accompanying this report. The EIS intends to inform the community and stakeholders about the Proposal, including its social, economic and environmental impacts, mitigation measures and benefits, as well as providing an environmental assessment of the proposal.

The applicant's details are noted as:

Applicant	Illawarra Retirement Trust (IRT) Group (Registered Community Housing Provider)
Postal Address	3/77 Market St, Wollongong NSW 2500
ABN	52 000 726 536

Overview of Proposed Development

The development proposes redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing residential care facility , wellness hub, landscaping and car parking.



The SSDA proposes to undertake the following works:

1. Construction of five (5) seniors housing buildings comprising a total of 98 dwellings:
 - Building A – 16 Independent Living Units
 - Building B – 8 Independent Living Units
 - Building C – 27 Independent Living Units
 - Building D – 32 Independent Living Units
 - Building E – 15 Independent Living Units and Social Wellness Centre
2. New basement level and at grade car parking for 182 spaces.
3. Additions to the existing Flametree Residential Care Facilities (RCF) and connection to the basement car park.
4. Demolition of internal road networks and existing car parking, to be replaced in newly proposed basement.
5. Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide cafe and staff amenities.
6. Retention of existing Camelia Lodge Independent Living Units.
7. Landscaping and vegetation management in the riparian corridor.

The proposal is detailed in the architectural drawings prepared by Calderflower (as shown below and attached to the application) and described in the following sections of this EIS.

Planning Secretary's Environmental Assessment Requirements

On 5 August 2024, the Department of Planning, Housing & Infrastructure issued the Planning Secretary's Environmental Assessment Requirements (SEARs) for the Seniors Housing - IRT Woonona Redevelopment (SSD-73910208). Industry-specific SEARs have been issued for the project along with the following additional assessment requirements:

The Department has identified assessment requirements additional to those attached. These requirements, in addition to the industry-specific SEARs, are provided below and should be taken to be the collective SEARs for the project.

- The detailed flood impact and risk assessment, in addition to the requirements in the industry-specific SEARs, must consider the following:
 - The management of flood risk for the full range of flooding up to and including the Probable Maximum Flood (PMF).
 - Any impacts of climate change.
 - Any evacuation and shelter-in-place requirements/procedures with consideration of the Draft Shelter-in-place Guideline.



- Demonstrate that the proposal will meet the site-related requirements in Division 4 of State Environmental Planning Policy (Housing) 2021.

This EIS provides an assessment of the environmental impacts of the proposal in accordance with the issued SEARs, additional assessment requirements and sets out the undertakings made by IRT Woonona to manage and minimise potential impacts arising from the development.

Objectives of the Development

The existing seniors housing complex, IRT Woonona, has been operational since the late 1980's. The existing RCF building, which is the subject of proposed alterations is known as Flametree Lodge and has been utilised as a 102-bed residential care facility since its establishment in 2008.

The changes proposed as part of this Development Application have been identified by the Illawarra Retirement Trust (IRT) to upgrade the existing building and are intended to redefine the possibilities of a retirement village, intertwining the spaces with the adjoining riparian zones with semi-public and private spaces. The outcome of the project is to create fantastic user experiences, particularly for the resident.

Background

Project Context - IRT Woonona

Woonona, located in the Illawarra region of New South Wales, is a coastal suburb characterised by its blend of scenic beauty and community spirit. Nestled between the ocean and the escarpment, it offers residents and visitors a variety of beaches and natural spaces, making it popular for outdoor activities like surfing and hiking. The suburb has a diverse demographic, with a mix of young families, professionals, and retirees, contributing to its vibrant community atmosphere. Local amenities include well-regarded schools, shopping areas, and recreational facilities, which support an active and engaged community life. Woonona's historical significance and ongoing development make it a dynamic part of the greater Wollongong area.

Constructed in the mid-1970s, IRT Woonona is one of IRT's first established sites, featuring a total of 152 beds divided among self-care units, retirement living spaces, and staff accommodations. To meet future resident's needs, the decision by IRT's management team was to demolish 3 buildings: Ribbonwood, Blueberry Ash and Featherwood Cottage.

A development application DA-2023/808 was approved by Wollongong City Council on 24 April 2024 for the demolition of Ribbonwood, Blueberry Ash and Featherwood Cottage which includes the rectory to the southeast of the site. Most of the demolition works have been completed and are expected to be completed in late August 2025. The Architectural Plans reference the approved demolition and the proposed demolition required for this SSDA.



The aerial map dated 6 June 2025 (Image 1) extracted from Nearmap illustrates the demolition works that have been completed to date with Blueberry Ash ILUs and Ribbonwood RCF partially demolished.

Previous approvals

Details of the Development Approvals reviewed are outlined below. Earlier applications were not available.

Application No.	Date	Application Description	Notes -
DA 88/514	21 July 1988	Alterations and additions to office accommodation	Approved with conditions.
DA 90/841	14 November 1991	Demolition of existing dwelling and construction of 6 dwellings	Approved with conditions.
DA 95/166	6 April 1995	Accommodation for aged persons (SEPP 5) – 8 x 2-bedroom units	Approved with conditions.
DA 99/105	13 April 1999	Garage	Approved with conditions.
DA 2002/1818	30 September 2002	6 x 3-bedroom townhouses with garages	Unstamped plans, DA application form, and SEE. No Development Consent in file.
DA 875/03	6 June 2003	Demolition of existing shop and dwellings	Approved with conditions.
DA 2005/1646	20 January 2006	Demolition of existing buildings and associated landscape, civil and drainage works and construction of residential care facility with 102 beds.	Approved with conditions.
DA 2005/1646/A	8 May 2006	Demolition of existing buildings and associated landscape civil and drainage works and construction of residential care facility with 102 beds – modification to conditions No. 3, 7, 11, 12, 24, 34, 36 and 42 of development consent.	Approved with conditions.
J060038 – final OC	1 September 2008	Demolition of existing buildings and associated landscape, civil and drainage works and construction of a residential care facility with 120 beds.	Final OC limited to the construction works approved to DA – 2005/1646 dated 20 January 2006 and Section 96 modification issued 9 May 2006.
DA 2008/824	4 September 2008	Change of use – use of Heritage building for dementia day care centre, reroof building and construct a covered walkway.	Approved with conditions.
DA 2009/619	13 October 2009	Erection of fence around the front boundary.	Approved with conditions.
DA 2010/316	23 December 2010	Two (2) lot subdivision	Approved with conditions.



DA-2023/808	24 April 2024	Staged demolition - Aged Care Facility - demolition of existing buildings (excluding Flametree Residential Aged Care Facility, Camelia Lodge and the Church), including some hardstand demolition and tree removal	Approved with conditions.
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Project Strategic Context – Aging Population and Need for Seniors Housing

As detailed in the Social Impact Assessment by Cyde Consulting, the demand for seniors housing is documents documented the Ageing Well in NSW: Seniors Strategy 2021 – 2031, and Wollongong’s Local Housing Strategy 2023.

As the population ages in the Wollongong area, there is likely to be more demand for accommodation for older people, and Independent Care Units (ICUs) contribute additional and diverse housing options to enable more older people in the Wollongong LGA to live independently.

The Project provides an additional 98 ICUs to meet the demands of an increasing number of older people who require secure and appropriate housing. Further, providing ICUs as part of the residential aged care community provides opportunities for older people to more easily transition into aged care and continue to be part of the community, maintain social connections, and age in place.

Project Vision

This project is a result of the IRT site being reimagined by the Illawarra Retirement Trust (IRT) for its current and future residents and the masterplan concept is intended to redefine the possibilities of a retirement village, intertwining the spaces with the adjoining riparian zones with semi-public and private spaces. The outcome of the project is to create fantastic user experiences, particularly for the residents.

Strategic context

Site Description

The subject site is known as 4-6 Popes Road, Woonona. The subject site is located southeast of the Woonona town centre, on the northeastern border of Gahans Park, and connects to the southern side of Popes Road and western side of Princes Highway – see images 8-9 below.

The property is a single Torrens title allotment described as Lot 71 DP 1160947 and has a site area of approximately 2.92 hectares. The site itself is a large parcel zoned R2 Low Density Residential and part zoned E3 Productivity Support (Image 10).



The site contains multiple buildings and internal roadways associated with seniors housing development “IRT Woonona”. The structures on site currently include:

- Flametree Residential Care Facility (RCF)
- Ribbonwood RCF
- Blue Gum Sanctuary (Heritage Listed Church)
- Rectory
- Camelia Lodge Units
- Blueberry Ash Apartments

Ribbonwood Residential Care Facility is currently connected to the west of the building by a pedestrian bridge, and Blueberry Ash Apartments are located to the south and separated by the southern carpark. A development application has already been approved April 2024 for the demolition of these adjoining buildings, including the rectory to the southeast, and most of the demolition works have been completed.

There is also a local heritage item located directly to the southeast of the building, internally referred to as Blue Gum Sanctuary, which will be retained and is not proposed to be affected as part of the recent development approval for demolition, or as part of this subject development application for alterations and additions.

Some vegetation exists on site directly to the north of Flametree Residential Care Facility, and an internal road runs to the south and east of the subject building, allowing for access and egress of the site by Popes Road.



IMAGE 8 – SUBJECT SITE (SOURCE: EPLANNING SPATIAL VIEWER)



IMAGE 9 – AERIAL IMAGE OF SUBJECT SITE – 6 JUNE 2025 (SOURCE: NEARMAP)

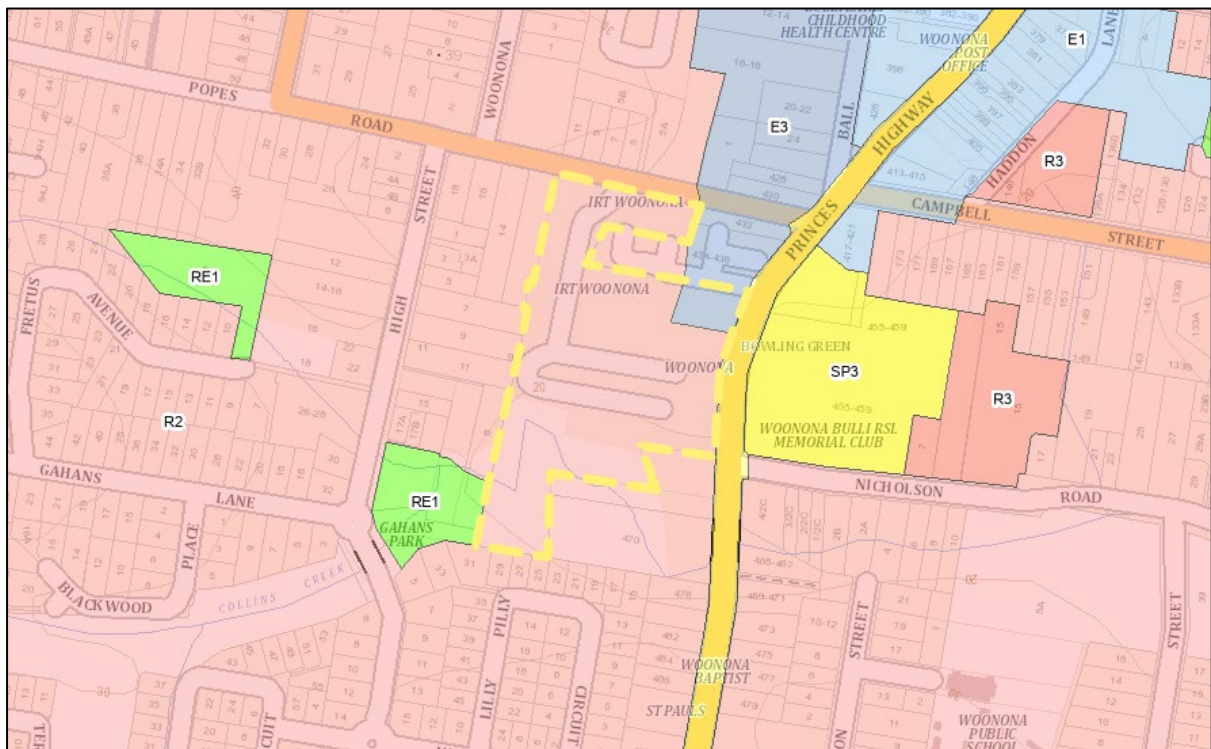


IMAGE 10 – SURROUNDING ZONING (SOURCE: NSW PLANNING PORTAL)



Surrounding Context

The site is zoned R2 Low Density Residential and E3 Productivity Support (Image 10).

<i>North</i>	<i>R2 Low Density Residential and E3 Productivity Support</i>	<i>Single and Double storey attached and detached dwellings accessed from Popes Road. Commercial premises</i>
<i>South</i>	<i>R2 Low Density Residential</i>	<i>Single and Double storey attached and detached dwellings accessed from Lily Pilly Circuit and the Princes Highway.</i>
<i>East</i>	<i>R2 Low Density Residential and SP3 Tourist</i>	<i>Woonona Bulli RSL Memorial Club. Vacant commercial site.</i>
<i>West</i>	<i>R2 Low Density Residential and RE1 Public Recreation.</i>	<i>Single and Double storey attached and detached dwellings accessed from Popes Road and High Street. Cahans Park.</i>

Photographs of the existing development (prior to demolition work commencing) described above are shown in Images 11 to 19.



IMAGE 11 – BLUE GUM SANCTUARY (SOURCE: MMJ WOLLONGONG)



IMAGE 12 – FLAMETREE RCF & BLUE GUM SANCTUARY (SOURCE: MMJ WOLLONGONG)



IMAGE 13 – LOOKING EAST DOWN POPES ROAD, CAMELIA LODGE ON RIGHT (SOURCE: MMJ WOLLONGONG)



IMAGE 14 – LOOKING NORTH DOWN POPES ROAD (SOURCE: MMJ WOLLONGONG)



IMAGE 15 – BLUEBERRY ASH APARTMENTS (SOURCE: MMJ WOLLONGONG)



IMAGE 16 – BLUEBERRY ASH APARTMENTS (SOURCE: MMJ WOLLONGONG)



IMAGE 17 – ROAD INTO IRT LOOKING SOUTH, RIBBONWOOD ON RIGHT (SOURCE: MMJ WOLLONGONG)



IMAGE 18 – ROAD INTO IRT LOOKING SOUTH, FLAMETREE RCF ON LEFT (SOURCE: MMJ WOLLONGONG)



IMAGE 19 – REAR OF FLAMETREE RCF (SOURCE: MMJ WOLLONGONG)

Ecology and Vegetation

The subject site exists in an urban landscape and does not retain any connectivity to larger expanses of habitat. However, the broader property boundary retains connectivity to the Illawarra Escarpment via the vegetation associated with the riparian corridor along Collins Creek. The vegetation along Collins Creek is likely to provide some level of connectivity for local wildlife to areas containing important habitat features.

Topography

The general topography of the surrounding area slopes down in an easterly direction towards the Tasman Sea, with steep east facing slopes located approximately 1 km to the west of the site associated with the Illawarra escarpment. Most of the site slopes downwards generally in a southerly and south easterly direction towards Collins Creek with an approximate change in elevation of 10 m. The highest point of approximately 32 m relative to the Australian Height Datum (AHD) is located in the



north western corner of the site. The lowest point is at approximately 22 m AHD located at the southern part of the site (at Collins Creek).

Geology

Reference to NSW Seamless Geology Sheet (Department of Regional NSW, 2021) indicates that most of the site is underlain by Wilton Formation mudstone of Lopingian Age, typically comprising dark claystone and dark siltstone, interbedded with sandstone, bioturbation, sideritic concretions and plant fossils. Mapping also indicates that the southern and eastern portions of the site are underlain by Alluvial fan deposits of Quaternary Age, typically comprising fluviially-deposited quartz-lithic sand, silt, gravel and clay.

Vehicular access and parking

- **Popes Road** – Popes Road is classified and functions as a local road. It is aligned in an east-west direction along the northern boundary of the site. It is a two-way road configured with one lane in each direction with no line marking set within a carriageway of around 7.5 metres wide. The section of Popes Road between Princes Highway and the property boundary generally has unrestricted kerbside parking on either side of the carriageway. There is a posted speed limit of 50km/h which extends into the residential area towards the west of the site. Popes Road typically carries around 2,000 vehicles per day.
- **Princes Highway** – The section of Princes Highway which forms the frontage to the subject site and towards the north along the Woonona town centre is classified as a local road and functions as a key sub-arterial road. The Princes Highway is generally aligned in the north-south direction adjacent to the site. It is a two-way road provided with two-lanes in each direction with appropriate line marking to delineate the lanes. No kerbside parking is permitted on either side of the road directly in front of the site. However, both kerbside lanes within the Woonona town centre are signposted as restricted parking between 8:30am to 6:00pm Mon-Fri and 8:30am to 12:30pm Sat. There is a posted speed limit of 60km/h. The Princes Highway typically carries around 10,000 vehicles per day.

Pedestrian Access

Pedestrian paths are located as follows:

- Popes Road (both sides) – 1.2m footpath,
- Princes Highway (both sides) – 2.5m footpath.

Safe crossing points near the site include the following pedestrian crossings:

- midblock signalised pedestrian crossing on Princes Highway on the east boundary of the site.



- Signalised pedestrian crossings on all approaches of the Princes Highway/ Campbell Street intersection to the north of the site.

There are no current bicycle paths/lanes on the Princess Highway, Popes Road, and Campbell Street, however, shared paths and bicycle lanes are located on Memorial Drive. To access these bicycle lanes, cyclists from the site must travel via Popes Road and Campbell Street.

Public Transport

Services are provided from Woonona to Wollongong in the south or Austinmer Station to the north. The site is serviced quite well with services in both directions operating every 20 to 30 minutes throughout the day. The Table below extracted from the Transport and Accessibility Impact Assessment (Appendix GG) shows that services provided from Woonona to Wollongong in the south or Austinmer Station to the north. It is noted that Route 2 and 91 are not operational on weekends, however Route 90 operates every 30-40 minutes between 7:10-23:10 on Saturdays and every 60 minutes on Sundays between 8:10-20:05.

Service	Route #	Route Description	Location of Stop	Distance to Nearest Stop	Frequency On/Off Peak
Bus	90	Wollongong to Austinmer Station	Princes Hwy at Popes Rd	140m	20min / 30min
		Austinmer Station to Wollongong	Princes Hwy at Popes Rd	140m	20min / 30min
Bus	2	Stanwell Park to Wollongong via Thirroul	Princes Hwy at Popes Rd	140m	30min / 60min
Bus	91	Austinmer Station to University of Wollongong	Princes Hwy at Popes Rd	140m	60min/120min

Heritage

It is acknowledged that the original inhabitants of the Illawarra, Wollongong Harbour and coastline are the Dharawal people.

The site is in a mixed residential and commercial area characterised by one and two-storey buildings ranging in date from the Victorian, Federation, and Inter-War periods through to the late 20th century and more recent infill. Older buildings are primarily constructed of brick or weatherboard and newer buildings of concrete and fibre cement cladding. To the east of the site is the Princes Highway, as well as the South Coast railway line.

Popes Road runs west off Princes Highway, with the north side elevated above the south due to the rise of the land. The road carries two-way traffic with provision for parking on both sides of the road. Concrete footpaths line either side of the road. Popes Road is primarily residential and characterised by single-storey Victorian



period weatherboard cottages, as well as by two and three-storey contemporary brick or fibro dwellings and residential flat buildings.

The section of the Princes highway near the subject site carries two-way traffic with no provision for street parking. Concrete or brick paved footpaths line either side of the road. This part of the highway is mixed residential and commercial and characterised by single-storey Victorian and Federation period weatherboard dwellings, as well as one and storey 20th century and contemporary brick dwellings and commercial buildings.

Nos. 4-6 Popes Road, Woonona:

- Contains a heritage item listed by Schedule 5 Part 1 of the *Wollongong LEP 2009* ('Former Woonona Uniting Church').
- Is not located in a Conservation Area by Schedule 5 Part 2 of the *Wollongong LEP 2009*.
- Is not listed as an item on the State Heritage Register under the *NSW Heritage Act 1977*.

There are five heritage items listed by Schedule 5 Part 1 of the *Wollongong LEP 2009* within the vicinity of the site:

- 'Woonona Industrial Co- Operative Society', Nos. 20-22 Ball Street, Woonona – This item is located to the north of the site and is separated from it by a distance of at least 75m. The setting of the item includes single-storey 20th century period buildings and two and three-storey infill. The principal view corridor towards the item is from directly outside on Ball Street. There are no existing views at ground level between the item and the subject site.
- 'Woonona post office', No. 430 Princes Highway, Woonona – This item is located to the north of the site and is separated from it by a distance of at least 20m. The setting of the item includes single-storey 20th century period buildings and two and three-storey infill. The principal view corridor towards the item is from directly outside on either Princes Highway or Popes Road. There are existing limited views at ground level between the item and the subject site.
- 'Woonona Public School', No. 5A Gray Street, Woonona – This item is located to the east of the site and is separated from it by a distance of least 185m. The setting of the item includes single-storey 20th century period dwellings. The principal view corridor towards the item is from directly outside on Gray Street, with secondary view corridors on Nicholson Road and Liddle Street. There are existing limited views at ground level between the item and subject site, however, the focus of the item comprising a group of school buildings has no visibility from the site.



- ‘Woonona Bulli School of Arts’, No. 479 Princes Highway, Woonona – This item is located to the southeast of the site and is separated from it by a distance of at least 130m. The principal view corridor towards the item is from directly outside on Princes Highway. There are no existing views at ground level between the item and the subject site.
- ‘Pendlebury Rest Park’, Corner Princes Highway and Gray Street, Woonona – This item is located to the southeast of the site and is separated from it by a distance of at least 200m. The setting of the item includes single-storey 20th century period dwellings and two-storey contemporary development. The principal view corridor towards the item is from directly outside on either Princes Highway or Gray Street. There are no existing views at ground level between the item and the subject site.

Strategic Planning Context

TABLE 2 – SUMMARY OF STRATEGIC CONTEXT

Strategic Plan	Strategic Context
<i>NSW State Priorities</i>	The proposal will deliver on key NSW state priorities. The proposal will deliver on the priority of <i>‘well connected communities with quality local environments’</i> through the provision of high quality seniors housing, open space and community facilities. The site also has strategic merit to improve the connectivity of the community by providing accommodation in close proximity to various bus routes connecting the site to various locations around Greater Sydney as discussed below.
<i>Illawarra Shoalhaven Regional Plan 2041</i>	<p>The Illawarra Shoalhaven Regional Plan sets the strategic framework for the region, aiming to protect and enhance the region’s assets and plan for a sustainable future. It is a 20-year land use plan prepared in accordance with section 3.3 of the Environmental Planning and Assessment Act 1979 and applies to the local government areas of Wollongong, Shellharbour, Kiama and Shoalhaven.</p> <p>Objective 18: Provide housing supply in the right locations. The Regional Plan identifies West Lake Illawarra, Nowra-Bomaderry and Bombo Quarry as growth areas. Aside from these areas, the Plan concentrates new development and intensive uses in existing centres, rather than in the scenic hinterland that defines the coastal rural character of the region. The proposal aligns with this priority as the addition of the senior housing allows the existing development to adapt to local needs.</p> <p>Objective 19: Deliver housing that is more diverse and affordable. People may need homes of a certain size, configuration, accessibility or location. Planning for a diversity of housing choices gives more people more options at different stages of life, and different levels of affordability. Housing diversity extends into aspects such as lot sizes, the number of bedrooms, or whether housing is suitable for seniors, students or people with a disability. The proposal generally aligns with Objective 19 by provide a mix of</p>



	<p>housing types by delivering a diversity of housing types and sizes in an accessible location. The proposal will deliver 98 independent dwelling units consisting of four (4) x one (1) bedroom, forty-four (44) x two (2) bedroom and fifty (50) x three (3) bedroom units throughout five (5) apartment buildings.</p> <p>Objective 23: Celebrate, conserve and reuse cultural heritage. The Illawarra Shoalhaven has a rich and diverse heritage with strong links between Aboriginal communities and the region's coast and the escarpment, as well as townships associated with early European colonisation, including Mount Kembla. The region's heritage is part of its identity and character and could generate greater economic value, particularly through cultural tourism. It is acknowledged that the original inhabitants of the Illawarra, Wollongong Harbour and coastline are the Dharawal people. An Aboriginal Cultural Heritage Assessment was undertaken for the proposal by Austral Archaeology. The background research found the study area has low archaeological potential due to significant ground disturbance caused by the construction of buildings, amenities, roads and landscaping within the highly developed urban areas of the site. During the site inspection a culturally modified scar tree, outside of the scope of the works was recorded in the study area (AHIMS #52-2-4988). This scarred tree was registered as an Aboriginal site as per the request of the Representative Aboriginal Parties (RAPs) present during the investigations and has been recommended any future works should avoid the culturally modified scarred tree and the areas of moderate archaeological potential in the south of the study area.</p> <p>The site contains a heritage item ('Former Woonona Uniting Church') and lies within the vicinity of other heritage items listed by Schedule 5 Part 1 of the LEP 2009. The heritage item on the site will be retained. The proposed adaptive re-use will help to conserve the heritage significance of the 'Former Woonona Uniting Church' by giving it a viable use that will raise the necessary funds for its long-term maintenance. The proposed restaurant use requires minor alterations that are confined to areas that have already undergone change, or are not readily visible. The fit-out will be minimally fixed into stud walls and will be easily reversible. Significant fabric including tiled floors and timber lined ceilings will be retained. The new kiosk and pavilion will present as visually subordinate in scale and materiality to the retained heritage item.</p>
<p><i>State Environmental Planning Policy (Housing) 2021 (NSW), NSW Government</i></p>	<p>The Housing SEPP aims to deliver more affordable and diverse forms of housing, including co-living housing and independent living units and includes incentives for the delivery on additional seniors housing and development controls to ensure that the seniors housing meets industry standards and community expectations.</p>
<p><i>Seniors Housing Guideline, 2021, NSW Government</i></p>	<p>The guideline provides design principles to inform and assist future development to provide well designed seniors housing product that identifies requirements for occupants in seniors housing.</p>



<p><i>Ageing Well in NSW: Seniors Strategy 2021 – 2031, NSW Government</i></p>	<p>The Ageing Well Strategy sets out the NSW Government’s ten-year plan to respond to the opportunities and challenges of the ageing population. It builds on the NSW Ageing Strategy 2016–2020 and initiatives already underway across government and the community. The strategy has four focus areas:</p> <ol style="list-style-type: none"> 1. Living in age-friendly environments 2. Participating in inclusive communities 3. Staying safe, active and healthy 4. Being resilient and informed.
<p><i>Wollongong Local Strategic Planning Statement</i></p>	<p>A key element of the LSPS seeks to provide “Housing for all”. It defers strategic planning for housing in Wollongong LGA to a Local Housing Strategy the Wollongong Draft Local Housing Strategy 2022 (DLHS) has since been prepared. Further response to the LHS is provided below.</p>
<p><i>Our Wollongong Our Future 2032 Community Strategic Plan</i></p>	<p>The Community Strategic Plan (CSP) was adopted in June 2022 and outlines the community’s main priorities and strategies for achieving its future vision. The Community Strategic Plan seeks to balance the community aspirations, population growth projections, current and future challenges. It dovetails with state and regional plans.</p> <p>The Project most closely aligns with ‘Goal 5 We have a healthy community in a liveable city’, and the following action: <i>5.8 Housing choice in the Wollongong Local Government Area is improved, considering population growth, community needs and affordability’.</i></p>
<p><i>Wollongong Housing Strategy 2023</i></p>	<p>As the population ages the proportion of housing required for seniors also increases. Wollongong is fortunate to have a number of quality providers of aged care accommodation, who provide self-contained units and residential care facilities (nursing homes). The planning controls for seniors living is managed by the State through SEPP (Housing) 2021. Council’s role is to assess development applications.</p>
<p><i>Government Architect’s Connecting with Country Framework</i></p>	<p>The Connecting with Country Framework acts as a guide for developing connections with Country to inform the planning, design and delivery of built environment projects in NSW. Connection to Country will be incorporated throughout the lifecycle of the project and has informed the design development and State Design Review Panel process.</p>
<p><i>Crime Prevention through Environmental Design (CPTED) Principles</i></p>	<p>The high quality of the building design has included design objectives that are consistent with safer by design guidelines and CPTED principles. The subject development performs well to achieve the safer by design guidelines prepared by the NSW Police in conjunction with the NSW Department of Planning and Environment Council’s Development Control Plan. The development is deemed to be safe or safe subject to the implementation of various recommendations.</p>



Cumulative Impacts

Existing and future development proposals that have been approved in the suburb of Woonona that have the potential to result in cumulative impacts are identified in the table below. Most developments relate to residential development such as single dwellings, alterations and additions to dwellings, etc.

The potential impact of the development is limited to the increased number of dwellings in this location and the Social Impact Assessment (SIA) prepared by Cyde Consulting includes detailed assessment of the social impacts that can result from a significant seniors housing project. The SIA concludes that there are several highly positive impacts resulting from the projects and some negative impacts that are minor and temporary in nature.

The proposed redevelopment is anticipated to generate a net additional 28 trips in the AM peak period and 42 trips in the PM peak period. A SIDRA analysis of the Princes Highway/Popes Road intersection showed that the trips generated by the development will cause a maximum increase of 3 metres in queue and 3 seconds in delay which are negligible. Therefore, the proposed development is not anticipated to adversely impact the performance of the surrounding road network. Potential impacts of the development have been considered in the preparation of the architectural plans and supporting documentation with mitigation measures included to reduce the cumulative impact of development within the suburb of Woonona.

Key development within the vicinity in excess of \$500, 000 estimated development cost have been extracted from Council's DA tracking and Cordell's are included in Table 3 below. Most of the development in the last 10 years in this cost category has been residential development, child care centres, school upgrades and self-storage units. The overall cumulative physical impact of the proposal is considered to be negligible and as will be demonstrated are well within tolerable limits, capable of effective mitigation.

TABLE 3 – DEVELOPMENT APPLICATIONS IN THE VICINITY OF THE SITE.

DA Number	Location	Type
	481-485 Princes Highway, Woonona	DWELLINGS (12) - 2 storey
DA-2016/897	17 Liddle St, Woonona	CHILD CARE CENTRE
DA-2019/1464	9-11 Pioneer Drive (Lots 43 & 44 DP818249), Woonona	SELF STORAGE UNITS (6)/OFFICE - single & 2 storey
DA-2021/321 & /A	429-431 Princes Highway (Lot 1), Woonona	CHILD CARE CENTRE/FITNESS CENTRE/FOOD & DRINK PREMISES (6) - 2 storey



DA-2016/1747	35 Nicholson Rd (Lot 11 DP1079641), Woonona	TOWNHOUSES (8) - 2 storey
DA-2017/405	72-74 Campbell Street (Lots 34-35 DP977908), Woonona	DUAL OCCUPANCIES (3) - 2 storey
DA-2022/329	3A Cooper Avenue, Woonona	DWELLINGS (6) - 2 storey
DA-2015/1578	4 (Lot C) Mehaffey Av (DPI63458), Woonona	UNITS (5) - 2 storey
DA-2015/220	6-8 (Lots 18-19) Mountain Rd (DP21975), Woonona	UNITS (5) - 2 storey
N/A	13 Nicholson Ln, Woonona	SCHOOL - access - upgrade
N/A	488-490 (Lot 1) Princes Hwy (DPI009388 & DP663900), Woonona	TOWNHOUSES (6) - 2 storey
DA-2016/898	18 Liddle St, Woonona	CHILD CARE CENTRE
DA-2022/1024	455-459 Princes Highway & 15 Nicholson Road (Lot 2 & Part Lot 101), Woonona	TOWNHOUSES (26) - 2 & 3 storey

The Social Impact Assessment (SIA) prepared by Gyde Consulting including a scoping study to identify the potential social impacts to determine the overall extent of the assessment. The identification of potential impacts early in the project can also inform any changes or mitigation measures to avoid or minimise the impacts early in the project design process.

TABLE 4 – INITIAL IMPACTS IDENTIFIED THROUGH THE SCOPING STUDY AND PROJECT RESPONSES AND REFINEMENTS ARE ALSO LISTED (GYDE CONSULTING)

POTENTIAL IMPACT	PROJECT RESPONSES
Impacts related to the provision of ICUs, particularly as part of residential aged care, and the general need for additional housing in Wollongong	N/A
Impacts related to the proximity of goods and services, transport and social Infrastructure proximal to the site	Map the social infrastructure within 2km of the site
Impacts related to traffic and parking	Provide appropriate cycle spaces; prepare a Construction Traffic Management Plan
Impacts related to construction noise and vibration particular in an operational aged care community	Implement measures to minimise noise and vibration impacts Prepare a Noise and Vibration Impact Management Plan



Impacts related to local amenity because of increased height	Conduct a visual impact assessment.
Impacts related to the displacement of existing residents on the site	Eight (8) current residential aged care residents are required to move, however they have been relocated within the site.
Impacts related to the proximity of residential dwellings on the western side of the proposed development and potential noise impacts	Building B has moved toward the east 3 metres (from 6 m to 9m)

Analysis of Alternatives

The proposed development involves redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential Care Facility, wellness hub, landscaping and car parking. During the design process, alternative options were explored:

- **Do Nothing:** Leaving the site as is would result in continued underutilisation, with outdated and deteriorating buildings, failing to address the need for renewal or contribute to the area's requirement for seniors housing diversity and growth. It is also inconsistent with the broader strategic planning policies including the Illawarra Shoalhaven Regional Plan 2041. The 'Do Nothing' approach would represent a missed opportunity to align the future of the site with the State Government's strategic vision to recognise demand for diverse housing types within accessible locations. Therefore, the 'Do Nothing' scenario is not considered to be an acceptable approach.
- **Alternative Purpose:** Other potential uses for the site were considered but deemed less suitable given the site's existing use, zoning and location.
- **Alternative Design:** An Urban Design Analysis has been undertaken by Urbanac which analysed the site to ensure the development is efficiently designed on the right to complement the sites features and limit the impact to the sites constraints. Nine (9) key areas were assessed including:
 - Physical site
 - Access
 - Landscape
 - Heritage
 - Views
 - Streetscape
 - Setbacks



- New Building Zones
- Building Heights

The site is heavily constrained by:

- Watercourses, flooding and overland flow paths (which have set building levels and a channel across the north frontage) and associated riparian vegetation
- Ensuring access to and from retained buildings and operational continuity
- Heritage including conserving and adaptively reusing the site's heritage item, its curtilage, and the view corridor to Woonona and the escarpment
- Impediments to vehicle access via the Princes Highway given a secondary frontage.

Overall, this significantly constrains the opportunities for where new building massing can be accommodated on the site.

In addition, redevelopment of the buildings on the western and southern edges of the site are key development outcomes as this infrastructure has reached an age where it no longer meets IRT requirements. As a result, all massing options also include redevelopment of the:

- Existing linear building on the west of the site with new buildings maintaining the basics of the existing interface, and
- Low scale southern buildings with larger footprint buildings to the south of the site with an outlook over the riparian zone and the pedestrian spine.



IMAGE 20 – OVERALL CONSTRAINTS DIAGRAM

The constrained nature of the site limited the number of practical footprint options for the site. Two primary footprint options have been considered:

Option 1 (Image 21), a streetscape approach, building to the street alignment. This resulted in a more formal lawn in front of the heritage item that was not authentic to its interpretation, and visually separated the former church from the Woonona township.

Option 2 (Image 22), a view corridor approach, maintains a visual connection between the Woonona township and former church through to the escarpment beyond. This results in a less formal public open space in front of the former church



IMAGE 21 – MASSING OPTION 1 DIAGRAM



IMAGE 22 – MASSING OPTION 2 DIAGRAM

Response

- **Option 2** was preferred for reasons including:
 - Council indicated a strong preference for the preservation of the existing view corridor as an important heritage consideration
 - Visual connectivity between the Church and the Woonona township was considered a more authentic heritage response for the former church
 - Informal opening of the site to the street as a key design principle to better integrate retirement living with public life (rather than out-dated approaches which tend to be isolated and gated)
 - The option provided for improved connectivity between the high visual value riparian vegetation and new development
 - The streetscape space could still be appropriately framed by the eastern frontage of the northern building

Height

Three height massing options have been considered for the preferred footprint option:

Option 1 looks at delivering building massing with heights derived from the LEP together with the height bonuses from the Housing SEPP.

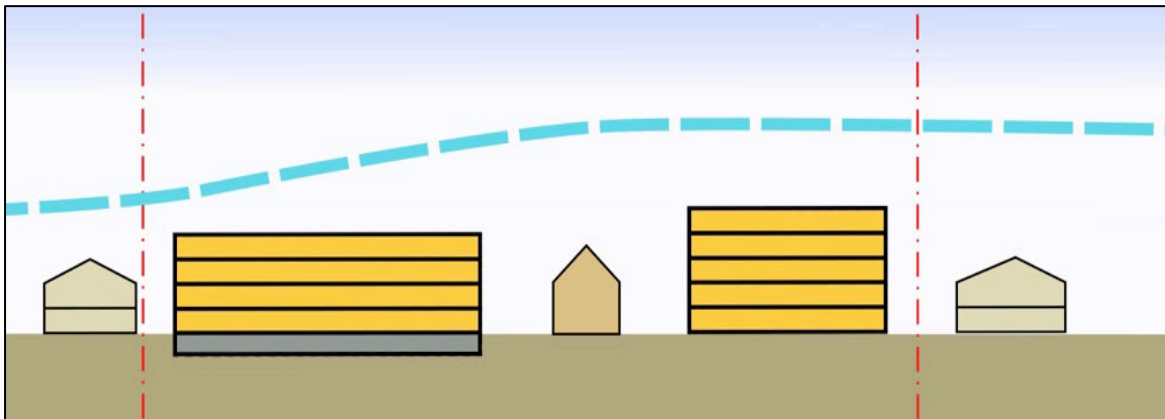


IMAGE 23 – HEIGHT OPTION 1 DIAGRAM

Option 2 looks at lowering the streetscape massing to achieve a 2-3 storey forms, and to rebalance that potential with taller forms interior to the site

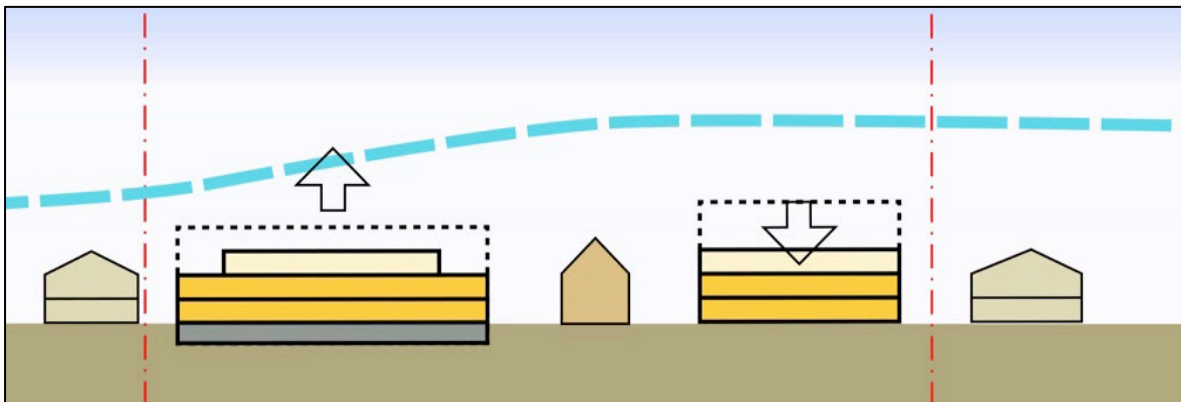


IMAGE 24 – HEIGHT OPTION 2 DIAGRAM

Option 3 looks at a middle approach, with a unified height of 4 storeys for new built form across the site (and a 3-4 storey form for the western linear buildings to maintain the existing interface condition)

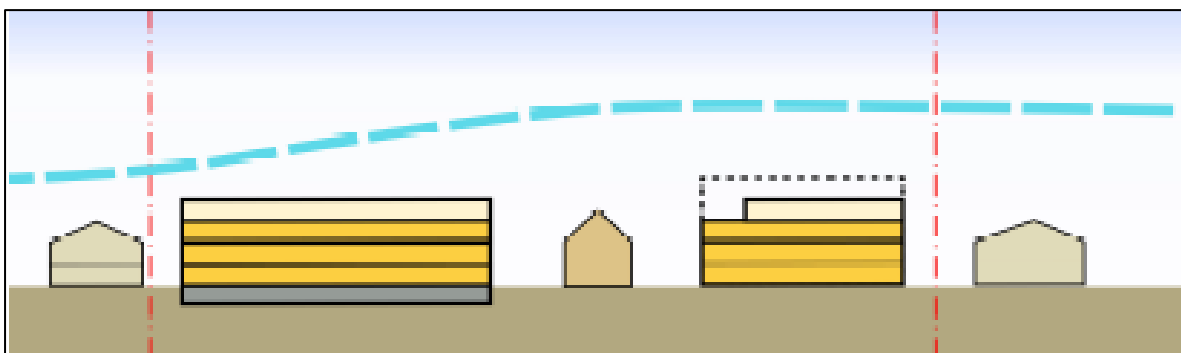


IMAGE 25 – HEIGHT OPTION 3 DIAGRAM



Response

- **Option 3** was preferred for reasons including:
 - For Option 1 a lower height was considered preferable despite the controls in the northern part of the site to better relate to the Woonona Township
 - Option 2 intent could be more successfully delivered by well-articulated streetscape buildings, plus it led to LEP non-compliances in the site interior
 - Option 3 was considered best able to provide a coherent approach to development on the site, allowing an architectural design solution rather than a planning envelope solution to manage scale relationships.

The Proposal

The development proposes redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential Care Facility, wellness hub, landscaping and car parking (the site).

The SDDA proposes to undertake the following works described in the Calderflower Architectural Plans (Appendix F):

1. Construction of five (5) seniors housing buildings comprising a total of 98 dwellings:
 - Building A - 16 Independent Living Units
 - Building B - 8 Independent Living Units
 - Building C - 27 Independent Living Units
 - Building D - 32 Independent Living Units
 - Building E - 15 Independent Living Units and Social Wellness Centre
2. New basement level and at-grade car parking for 182 spaces, internal roads and ancillary infrastructure such as stormwater, servicing etc.
3. Additions to the existing Flametree Residential Care Facilities (RCF) and connection to the basement car park.
4. Demolition of internal road networks and existing car parking, to be replaced in new proposed basement.
5. Retention of existing Heritage Church (Blue Gum Sanctuary) and repurposing to provide a cafe and staff amenities.
6. Retention of existing Camelia Lodge Independent Living Units.
7. Landscaping and vegetation management in the riparian corridor.
8. Temporary Vehicle Access from Princes Highway during construction for construction vehicles and to service Flametree through stages of construction.

The proposal is detailed in the architectural drawings prepared by Calderflower (as shown below and included as Appendix F) and described in the following sections of this EIS.

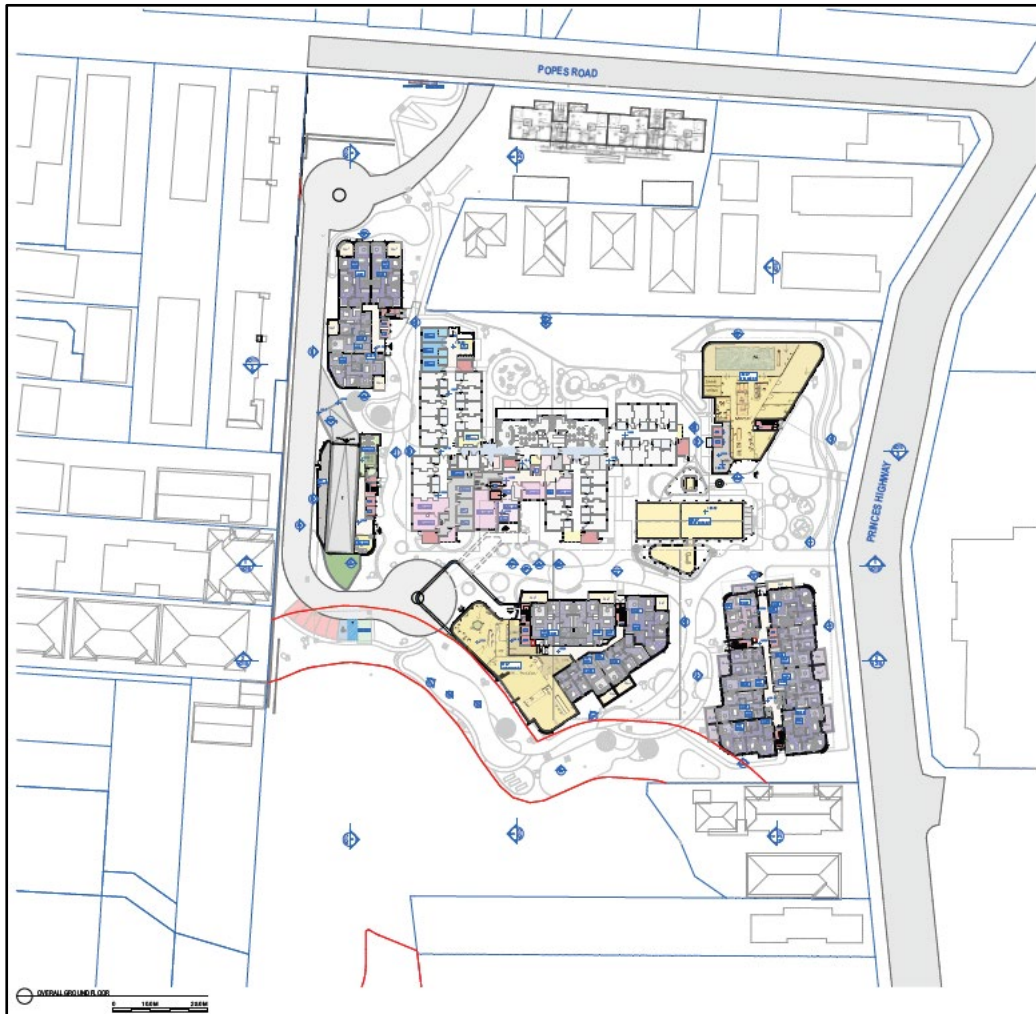


IMAGE 26 – GROUND FLOOR PLAN (SOURCE: CALDERFLOWER)

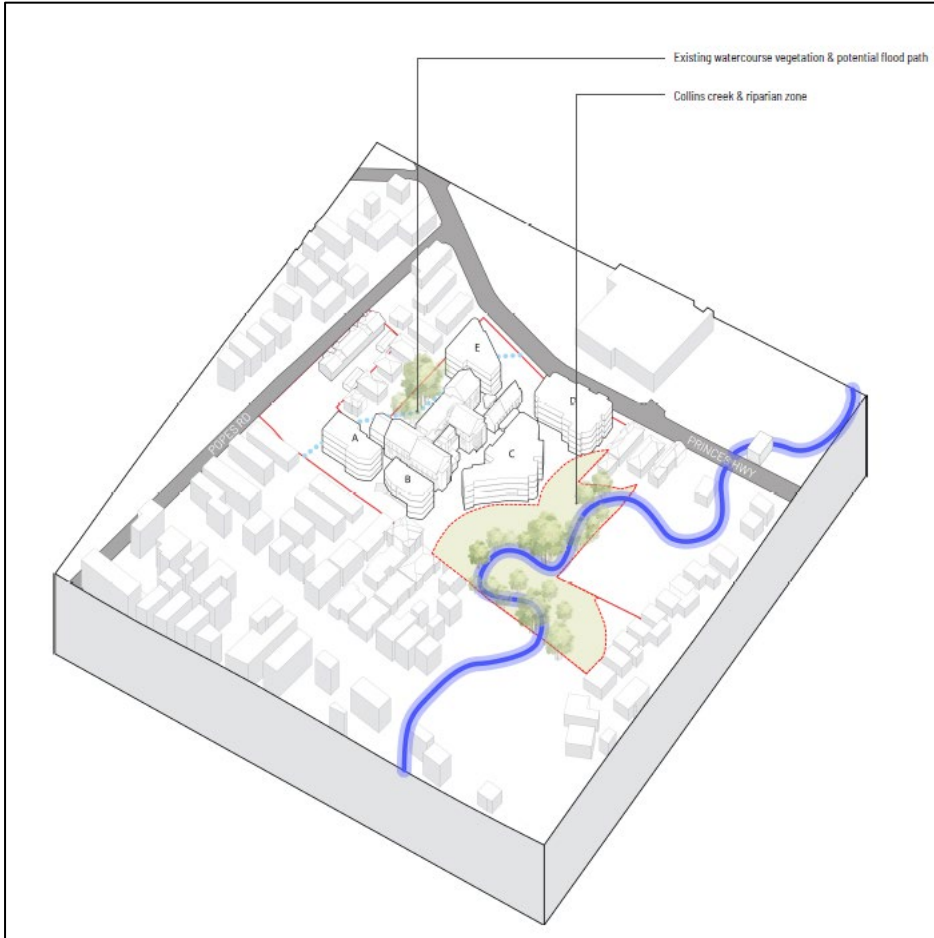


IMAGE 27 – 3D SITE ANALYSIS – RIPARIAN CORRIDOR AND CURTILAGE (SOURCE: CALDERFLOWER)



IMAGE 28 – BUILDING ELEVATIONS 1 & 2 (SOURCE: CALDERFLOWER)



IMAGE 29 – BUILDING ELEVATIONS 3 & 4 (SOURCE: CALDERFLOWER)



IMAGE 30 – BUILDING ELEVATIONS 5 & 6 (SOURCE: CALDERFLOWER)

Urban Design

Urbanac was engaged by IRT to undertake an urban design analysis (Appendix HH) of the proposed redevelopment and is submitted with this development application. The report was developed in collaboration with IRT, MMJ Planning and the various project architects including GW, AEJ and Calderlower Architects. The analysis examines how the desired future character based on the planning controls for the site can be delivered. It aims to guide good urban design outcomes for built form on the site that achieves a harmonious fit with the context.

Urbanac has provided urban design input on the project through the State Design Review Panel and development of the concept through to detailed design.

Site Preparation

Site preparation works include minor demolition of existing parts of buildings and removal of existing hard stand, together with some trees and vegetation on the site. The details of the proposed demolition works are identified within the Demolition Plan prepared by Calderflower (Appendix F and Image 31). Note that the Demolition Plan identifies those demolition works previously approved by Council under DA-2023/808 and the demolition works proposed as part of this SSDA.

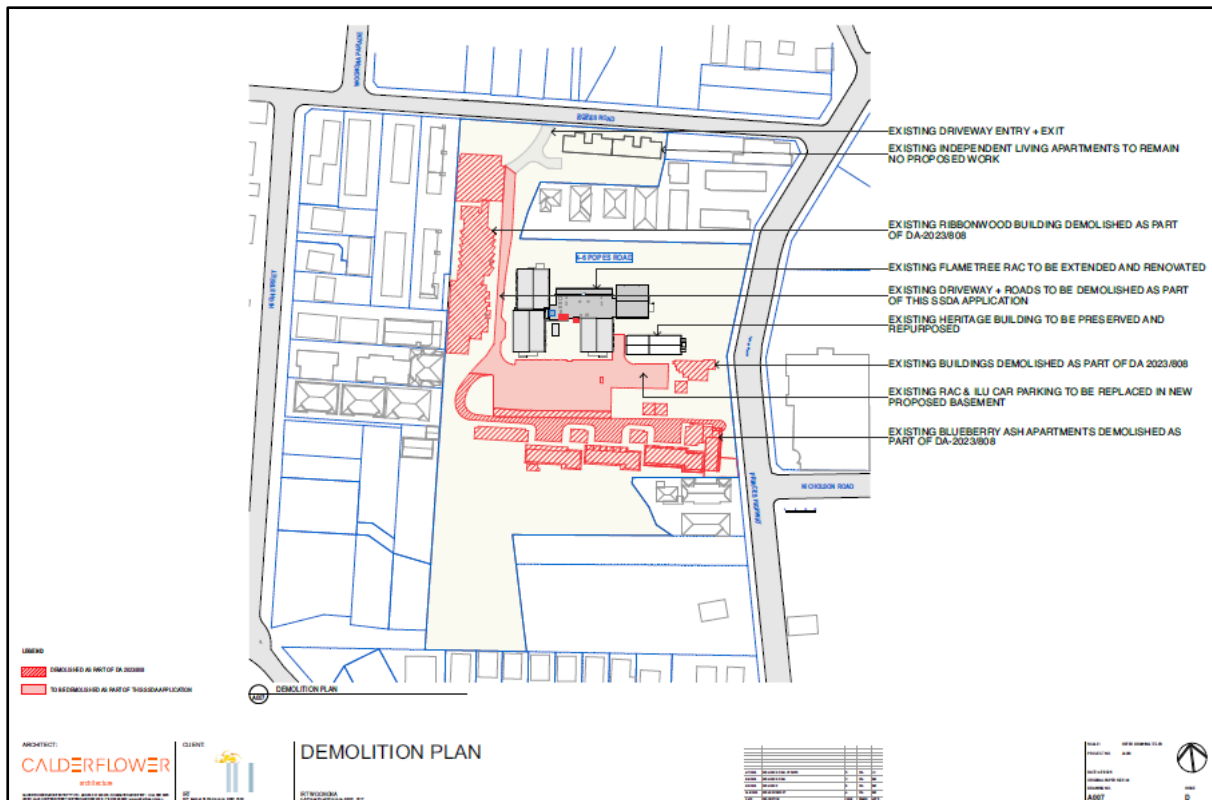


IMAGE 31 – DEMOLITION PLAN

The Arboricultural Impact Assessment (Appendix E) considered the proposed works and potential impacts of trees on and adjoining the site. Trees No. 14-16, 17.1, 18-20, 22, 23, 32-47, 47.1, 64-68, 70, 95, 97, 103, 110 and 111 are not adversely impacted by the design and are proposed to be retained with tree protection measures. A total of 73 trees is proposed to be removed including trees No. 1-13, 17, 21, 24-31, 48-63, 69, 71-94, 96, 98-102 and 104-109 are adversely impacted by the design and are unable to be retained and will be removed. It was noted that to compensate for the loss of these trees, consideration should be given to replace these trees within the site.

The existing structures proposed to be demolished are of an age that indicates the potential presence of hazardous materials. For this purpose, a hazardous materials (HAZMAT) assessment and management plan has been prepared for the site by Reditus to determine the existence of hazardous material (type and extent), and



provide recommendations for removal, containment or treatment where applicable. In this regard, Reditus provides the following general recommendations:

- *Remove all hazardous materials identified and recorded in Section 5 above, prior to demolition of the subject area.*
- *Should any previously unidentified suspected hazardous materials be identified during demolition, works should cease, and the materials should be inspected by an experience environmental consultant or occupational hygienist.*

In light of the hazardous materials assessment and recommendations, Elephant's Foot has prepared a waste management plan (WMP) for the management of construction and demolition waste generated. The WMP is attached to the application for consideration and incorporates a range of waste management provisions around roles and responsibilities, monitoring, reporting, excavation, safety, recycling, procedures, servicing and transport. Waste management strategies and auditing are a requirement on construction sites to promote strong sustainability outcomes, and ensuring robust procedures are in place is being promoted within this application.

In terms of bulk earthworks, cut and fill procedures are to be put in place during site preparation to ensure that appropriate terrain levels are generated throughout the site to accommodate future residential seniors housing. This work is a balanced approach for managing flood risk throughout the development.

In general, all structures within the site will be demolished in accordance with the provisions of AS 2601-2001 "The Demolition of Structures" by contractors experienced in this class of work and holding current permits and licenses as necessary. In regard to the existing buildings, the roofing and fascia materials will be removed first, followed by any doors and windows. The walls of the structures will then be demolished, together with the flooring and footings. This work will be carried out in accordance with the requirements of the NSW WorkCover Authority and the NSW Occupational Health and Safety Act, 2000.

All demolished materials will be removed from the site by road transport for recycling and/or disposal at a Council approved location (i.e. builder's tip, etc.). Asbestos will be removed and disposed by a licensed contractor to a tip registered with the NSW Waste Disposal Authority (in accordance with all relevant statutory regulations).

In addition to the above, and to assist with the basement parking excavation and the protection of any adjoining structures, a geotechnical and hydrogeological investigation was undertaken by Soilsrock. This report presents results of the geotechnical site investigation, laboratory testing, interpretation, and assessment of the site's existing geotechnical conditions, as a basis to provide recommendations for design and construction of ground structures for the proposed development.



The recommendations by Soilsrock are acknowledged and acceptable from a geotechnical perspective, and it is anticipated that these can be incorporated as conditions of any forthcoming consent accordingly.

Construction Staging and Temporary Access

The stages of construction have been outlined in the Staging Plans A010 and A011 (Appendix F(1)) and the scope of each stage is outlined below:

Stage 1 Basement – Western Basement Excavation and Construction, access ramp and stairs.

Stage 1 Ground Floor and Above and construction of Buildings A & B

Scope:

- Flametree resident room addition (NW wing)
- Flametree ground floor room conversions (SW wing)
- New public vehicle access from Popes Road
- New porte cochere
- New buildings A & B
- New western basement podium slab
- Protect Flametree SW stair egress
- New temporary carpark accessed from Princes Hwy

Notes:

- Existing building entries remain operational
- Existing discharge from RAC exits remain operational
- Public access from Princes Hwy during this stage

Stage 2A – Part Basement Excavation and Construction of Basement

Scope:

- New eastern basement

Notes:

- Stage 1 basement to be fully operational with interim OC prior to commencement of Stage 2A carparking in new Stage 1 basement
- Access from Stage 1 basement to Stage 2A temporary RAC entry is from basement stair
- Construction access from Princes Highway
- In-ground services infrastructure to be determined

Stage 2A - Construction of Buildings C, D and E

Scope

- New podium slab
- New buildings C, D & E
- Flametree RAC additions including lifts
- Flametree RAC alterations



- Flametree whole facility resident room refurbishment (staged in tranches of nine rooms at a time)

Notes

- Existing discharge from RAC exits remain operational
- Temporary bridging over construction zone for SW RAC egress by builder
- Temporary RAC entrance at west accessed from new driveway and stage 1 basement stairs
- Supplies to temporary laundry/kitchen is through RAC
- New construction adjacent to egress paths is fire-protected
- New egress from western basement
- Visitor and staff access from Popes Road
- Temporary construction access from Princes Hwy

Stage 3 - Basement

Scope

- Basement Construction complete and occupied

Notes

- RCF serviced from basement

Stage 3 – Restaurant and Landscaping

Scope

- Restaurant refurbishment and additions
- General site landscaping completed

Notes

- New construction adjacent to egress paths is fire-protected
- Existing discharge from RAC exits remain operational
- New exits from eastern basement
- Temporary construction access from Princes Hwy

Due to the works proposed in the western portion of the site through the first stages and continual operation of Flametree RCF, temporary access for staff and visitors is required to the south and north of the Princes Highway frontage. Temporary construction vehicle access is required to the south of the Princes Highway

Temporary Vehicle access for construction is proposed on the Princes Highway near the southern extent of Building D in the same location as the existing construction access used for the approved demolition works underway.



IMAGE 32 – STAGING PLAN 01 (CALDERFLOWER)

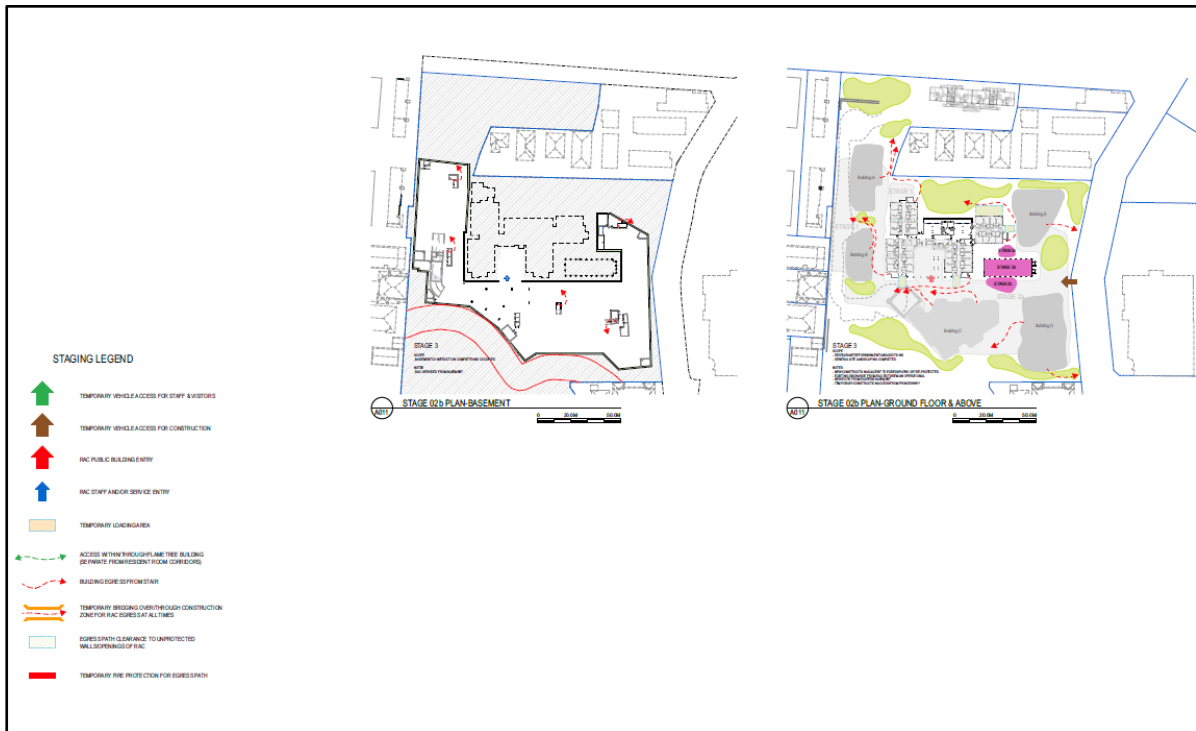


IMAGE 33 – STAGING PLAN 02 (CALDERFLOWER)



Contamination

The potential for contamination was investigated on site and was addressed in a two-stage process. The Preliminary Site Investigation (PSI) (Appendix Y) was undertaken by Douglas Partners and informed the Detailed Site Investigation (DSI) (Appendix M) was informed by the PSI and ideally should sit one after the other in the appendices

Refer to the Detailed Site Investigation (DSI) prepared by Soils Rock. The assessment found the following:

- The identified potential contaminants arising from site historical land use and activities is deemed to be low to medium.
- The detected concentration of all contaminants in soil around the site proposed redevelopment construction area would not present an unacceptable risk of exposure to human health within the context of the proposed use of the site for a residential retirement village development.

Based on the assessment, Soils Rock found that the site was suitable for the proposed residential development subject to recommendations.

External Materials and Finishes

The external materials and finishes are detailed on the architectural drawings and will comprise a combination of sandstone, vertical timber, face and painted brickwork, weatherboard walls, and framed glazing (Image 34 and Appendix K). The vertical arrangement of panels, vertical and horizontal articulation elements containing glass and cladding, all contribute to a modulated façade.

The external details have been carefully considered with Calderflower undertaking a comprehensive site analysis not only in terms of built form but also materials to ensure that the development will integrate with the existing setting and also provide a benchmark for future development in the area. Woonona is a beachside residential suburb with a relatively low-density residential character and comprises predominantly of weatherboard, fibro and brick veneer dwelling-houses and also a vibrant commercial town centre. The new development has been designed with this coastal architectural theme in mind and in response to the urban design analysis and heritage item on the site and within the vicinity. The materials selected are resilient, high quality and durable to endure the corrosive coastal environment.

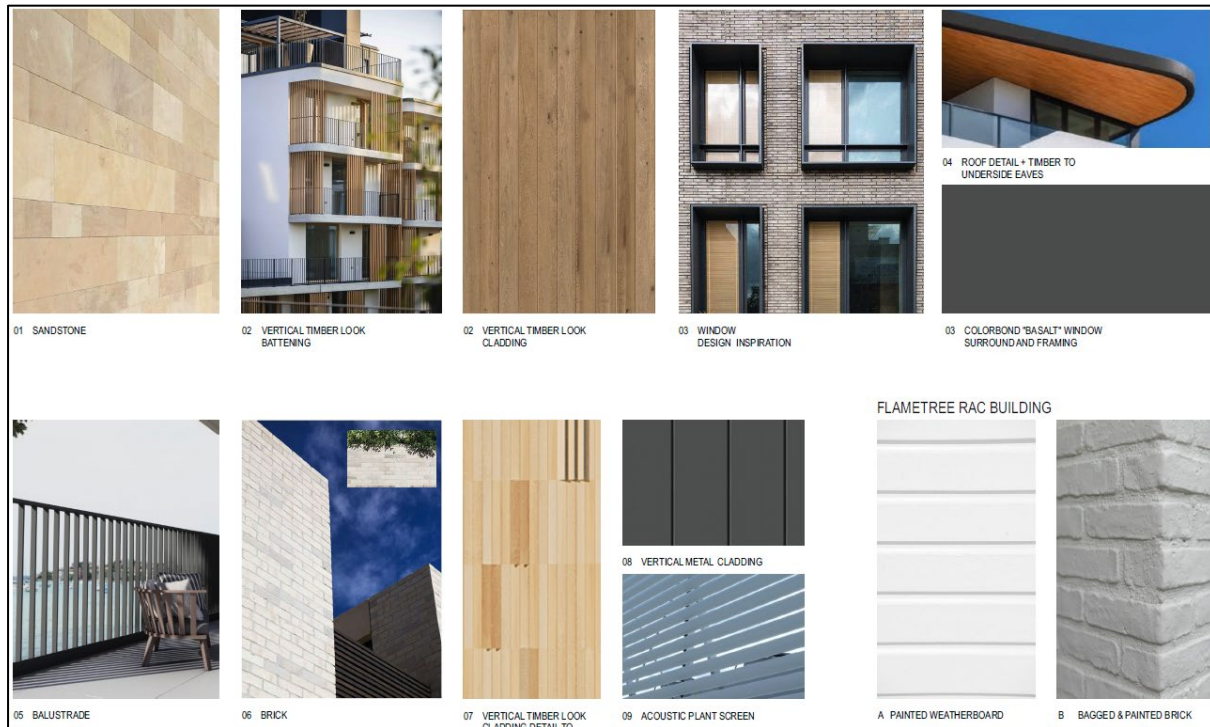


IMAGE 34 – SCHEDULE OF COLOURS AND MATERIALS (SOURCE: CALDERFLOWER)

Services and Infrastructure

The site is situated within an existing residential area and accordingly, the development will be connected to the existing public utility infrastructure available (i.e., power, water, gas, telecommunications, and the like). The services availability review was undertaken by JN (Appendix Z). It is understood there is sufficient capacity to accommodate the needs of the proposal subject to appropriate augmentation works.

Energy Efficiency/Sustainability

The proposed development has been designed to achieve relevant requirements, and the appropriate BASIX certification has been attached to demonstrate compliance in this regard by Credwell and the ESD Report prepared by Credwell which outlines compliance with Council's sustainability development controls. IRT's wellbeing initiatives will place users at the centre of its focus, it will encourage the following;

- Good quality and tuneable lighting
- Acoustic comfort
- Mold resistant materials
- Low-VOC paints and finishes, lowering the exposure to toxins
- Pest Management measures
- Ceiling fans
- Smoke free policy
- Clean air and natural ventilation



- Operable window shading
- Daylight access.

Further to this, an Integrated Water Management Plan which details Water Sensitive Urban Design (WSUD) measures incorporated into the stormwater management plan for the site is included as Appendix TT. The report covers the main initiatives, including providing efficient fittings and fixtures to reduce potable water demand, provide rainwater tank for rainwater harvesting and reuse, and introducing multiple WSUD measures to the system to improve the stormwater quality. The mentioned water management strategies are expected to be further developed and detailed by suitable consultants for future Construction Certificate detailed plans.

Stormwater treatment MUSIC modelling has been undertaken which involves the capture of stormwater run-off from hard surfaces such as roads, paving and roof areas within the site, and the filtration of this water through water quality initiatives such as rain gardens, swales and rainwater tanks, prior to discharge into the Collins creek outlet to the south.

Accessibility

A key feature of the proposed development is to provide equitable access and travel paths throughout so that all residents can easily access communal spaces and other dwellings to maximise community engagement and sense of place. A Statement of Compliance/Access Report has been prepared by Accessible Building Solutions (Appendix D) to address compliance is required with the following:

- The Access provisions of the BCA 2022
- The Access To Premises Standard
- AS1428 suite of Standards
- AS2890.6 for car parking
- AS1735.12 for lifts
- AS4299 Adaptable Housing
- SEPP Housing 2021 Chapter 3 Part 5
- Council's DCP relating to Access for People with a Disability

Under the BCA the building is classified as follows,

- Class 2 (building containing more than 2 x Sole-Occupancy Units)
- Class 7a (car park)
- Class 9b (assembly building)
- Class 9c (aged care building)
- Class 10b (swimming pool)

The report concludes that based on the basis of the assessment, the proposal can achieve compliance with the access provisions of the BCA, the Access to Premises Standard and Housing SEPP.



Traffic, Parking and Vehicular Access

The primary vehicular access is Popes Road with a new alignment for the internal access road to the basement and drop off at the porte-cochere for entry to the clubhouse. Temporary vehicle access from Princes Highway during construction for construction vehicles and to service the existing Flametree RCF through stages of construction. Temporary construction access to Princes Highway is currently being used for the approved demolition work underway.

To understand the inherit site traffic conditions that exist and are likely as a result of the proposed redevelopment, Stantec has been engaged to undertake a Transport and Accessibility Impact Assessment (Appendix GG) as required by the Secretary's Environmental Assessment Requirements (SEARs). This report sets out an assessment of the anticipated transport implications of the proposed development, including consideration of the following:

- existing traffic and parking conditions surrounding the site
- suitability of the proposed parking in terms of supply (quantum) and layout
- service vehicle requirements
- pedestrian and bicycle requirements
- suitability of the proposed access arrangements for the site
- the traffic generating characteristics of the proposed development
- the transport impact of the development proposal on the surrounding road network during construction and operation
- options to reduce the dependency on private cars and encourage public and active modes of transportation

The Traffic and Accessibility Impact Assessment provides the following conclusion:

- *Based on the analysis and discussions presented within this report, the following conclusions are made:*
- *An SSDA is to be lodged with the Department of Planning, Housing and Infrastructure for a proposed redevelopment of the existing seniors living development at 4-6 Popes Road, Woonona.*
- *The redevelopment involves the refurbishment of existing residential aged care facility and demolition of existing Independent Living Units. Five new buildings will be constructed, with a total of 98 independent living units, a function hall, social and wellness centre, a café, and staff amenities.*
- *The car parking and loading areas have been reviewed against the requirements of the Australian Standard for Off Street Car Parking (AS/NZS2890.1:2004 and AS/NZS2890.6:2009) and Parking Facilities Off-Street Commercial Vehicle Facilities (AS2890.2:2018). The basement car park and loading dock will operate satisfactorily, subject to the adoption of recommendations included in this report.*



- *The 187 new car parking spaces within the proposed development satisfies the required 176 parking spaces required by the Wollongong DCP and/or Housing SEPP.*
- *Swept path analysis of the proposed car park, loading dock, and emergency access showed that the design vehicles can manoeuvre the proposed internal road network.*
- *The proposed redevelopment is anticipated to generate a net additional 28 trips in the AM peak period and 42 trips in the PM peak period. A SIDRA analysis of the Princes Highway/ Popes Road intersection showed that the trips generated by the development will cause a maximum increase of 3 metres in queue and 3 seconds in delay which are negligible. Therefore, the proposed development is not anticipated to adversely impact the performance of the surrounding road network.*
- *The existing mode split within the area relies heavily on private car use. Developing a GTP would provide the opportunity to encourage alternative modes of transport.*
- *The peak hour traffic volume during construction is anticipated to be around 40 trips (two-way). This is expected to be easily accommodated on the surrounding road network for the duration of construction, subject to the preparation of a detailed CTMP.*
- *On this basis, the proposal can be supported from a traffic and transport perspective.*

On this basis, the proposal can be supported from a traffic, transport and accessibility perspective.

Tree removal and Landscaping

The subject site incorporates several trees which are required to be removed to facilitate the proposed redevelopment. All trees in the Wollongong Local Government Area are protected and cannot be removed without the adequate assessment being undertaken. Specifications relating to what can and cannot be removed are detailed in the Wollongong City Council Development Control Plan (DCP), 2009 in Chapter E17 '*Preservation of trees & management of trees and vegetation*'. This DCP protects all trees above three (3) metres in height with a girth of twenty (20) centimetres or more, measured at a distance of one hundred (100) centimetres above the ground.

The development requires the consideration of one hundred and eighteen (118) trees on and adjacent to site which prescribe to the definition of a tree and are protected by local council guidelines. An Arboricultural Impact Assessment Report has been prepared by Allied Trees. The aims and objectives of this report are to detail species identification, dimensions and condition, useful life-expectancies (ULE ratings²), tree retention values (IACA STARS ratings), tree protection zones (TPZ as per AS4970), impact upon all trees within the vicinity of proposal, design changes, construction

techniques, etc. and tree protection methodologies & recommendations. The above-mentioned recommendations are acknowledged and acceptable from a tree removal and protection perspective, and it is anticipated these can be incorporated as conditions of any forthcoming consent accordingly.

A total of 35 existing trees will be retained and 83 trees removed as identified in the Arborist Report (Appendix E). An additional 71 trees will be planted as detailed in the planting schedule in the Landscape Concept Plan (Appendix U). The existing canopy coverage is 6,480m² approximately 22.2% of the site area and the proposed canopy coverage is 10,981m² approximately 37% - see Image 35 below and Appendix U.



IMAGE 35 – RETAINED AND PROPOSED CANOPY COVERAGE (ARCADIA)

Considering the proposed vegetation removal, strong emphasis has been placed on achieving an optimal landscape vision for the proposed development in order to re-establish a natural localised character for future residents and the community. To assist in this vision a Landscape Plan (Image 36) has been prepared by Arcadia, who understand the importance of creating a community landscape which promotes healthy living and well-being. A central focus of their landscape strategy has been to provide a strong indoor-outdoor connection to increase the exposure of residents to green spaces, and create communal spaces that are flexible to support a variety of uses.

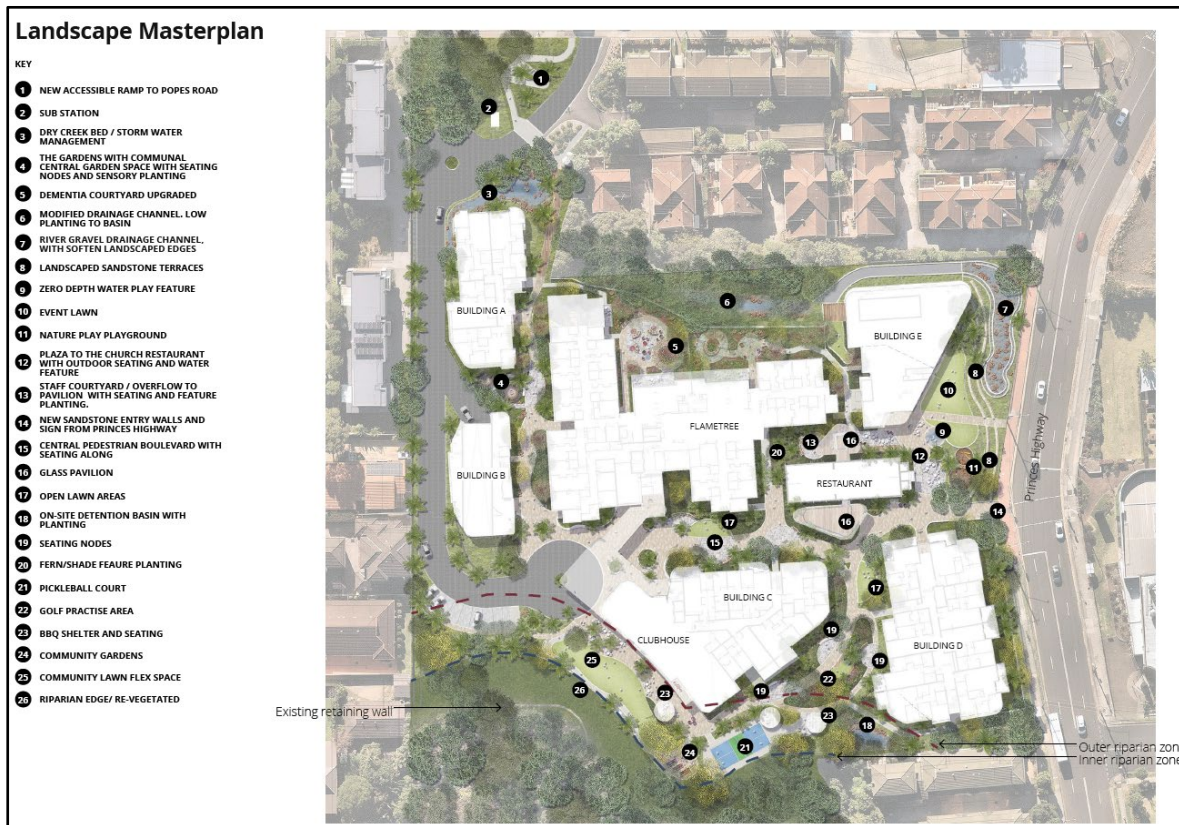


IMAGE 36 – EXCERPT OF LANDSCAPE MASTERPLAN (ARCADIA)

The landscape design focuses on the following landscape strategies;

- Circulation Strategy for vehicles
- Circulation Strategy for pedestrians (see Image 37)
- Fencing and Wayfinding Strategy
- Deep soil zone strategy
- Irrigation Strategy
- Landscape Maintenance Strategy

Connected Community

- Create spaces and amenity that encourage social interaction
- Cater for a combination of residents and their families
- Provide opportunity for activity between young and old

Connect to Dharawal Country

We pay respect to the traditional custodians of the land - the Dharawal people. The design seeks to bring people into the space and create spaces that connects back to land and honour other elements of Dharawal Country. The Landscape Report (Appendix Z (1)) outlines cultural opportunities fostered throughout the landscape design including:

- *Native Plants:* Gynea lily, lilly pillly, flannel flower (not build viewed on site, but mention of one to two stories referenced to these species) . Typically hardy species that are low maintenance and endemic to the local Woonona area.



- *Ochre Palettes:* Incorporate earthy ochre hues into the design to reflect traditional colours.
- *Cultural Materials:* Utilise materials such as sandstone (escarpment connection), dry river beds (rocks, reeds, water filtration, reed systems in water to assist water flow), re-use of excavated rock
- *Dharawal Cultural Signage:* Install signage that reflects the past, present, and future of Dharawal culture, with connections to other regional cultural sites such as the escarpment.
- *Pavement Pathways:* Design pathways with curvilinear shapes to mimic the natural movement of creeks.
- *Landscape Connectivity:* Ensure connections to surrounding landscapes

The project's connectivity to Country is celebrated through materials, planting and landscape design moves that allow Country to exist, and for existing and future residents to exist with Country. Landscape spaces have been created for contemplation and reflection, and for residents to appreciate the spectacular natural environment that surrounds the site.

Facilitate Comfort and Security

Create a home for residents that is comfortable, safe and secure. Ensure that communal outdoor spaces are easily accessed by all residents and their loved ones. Create spaces that are well-connected and embraced by the community.

Connectivity and circulation throughout have been a prime focus of the landscape concept, to ensure future residents can conveniently access and have affinity with key places.



IMAGE 37 – EXCERPT OF CIRCULATION STRATEGY -PEDESTRIAN (ARCADIA)

Biodiversity

A Biodiversity Development Assessment Report (BDAR) has been prepared by Ecoplanning (Appendix I) in accordance with Biodiversity Assessment Methodology (2020) to assess the impacts to biodiversity values, including vegetation communities and species habitats, associated with the proposed development application for the redevelopment of the existing seniors housing.

The BDAR has identified the landscape context of the subject land and a 1,500 m buffer around the subject land, in accordance with the BAM (Image 38). The native vegetation within the subject land has been assessed resulting in the identification of one PCT in two condition classes. The vegetation condition of this PCT has been mapped into vegetation zones, and vegetation integrity scores have been assigned to each of these vegetation zones.

Impacts have been avoided and minimised, though the proposal would result in some unavoidable impacts to biodiversity. The proposal will remove 0.03 ha of PCT 3153 in a 'Moderate' condition (see Image 38). PCT 3153 is a tall, wet forest found along creeks on the Illawarra Escarpment, dominated by Bangalay and Blue Gum trees, providing important habitat for native wildlife and supporting healthy waterways. The biodiversity offset requirement for residual impacts of the proposed development have been calculated and presented in accordance with Section 10 of

the BAM. The Credit Payment Report generated from the BAM Calculator is included in this report. A total of one ecosystem credit and one species credit is required to offset the proposed impacts.

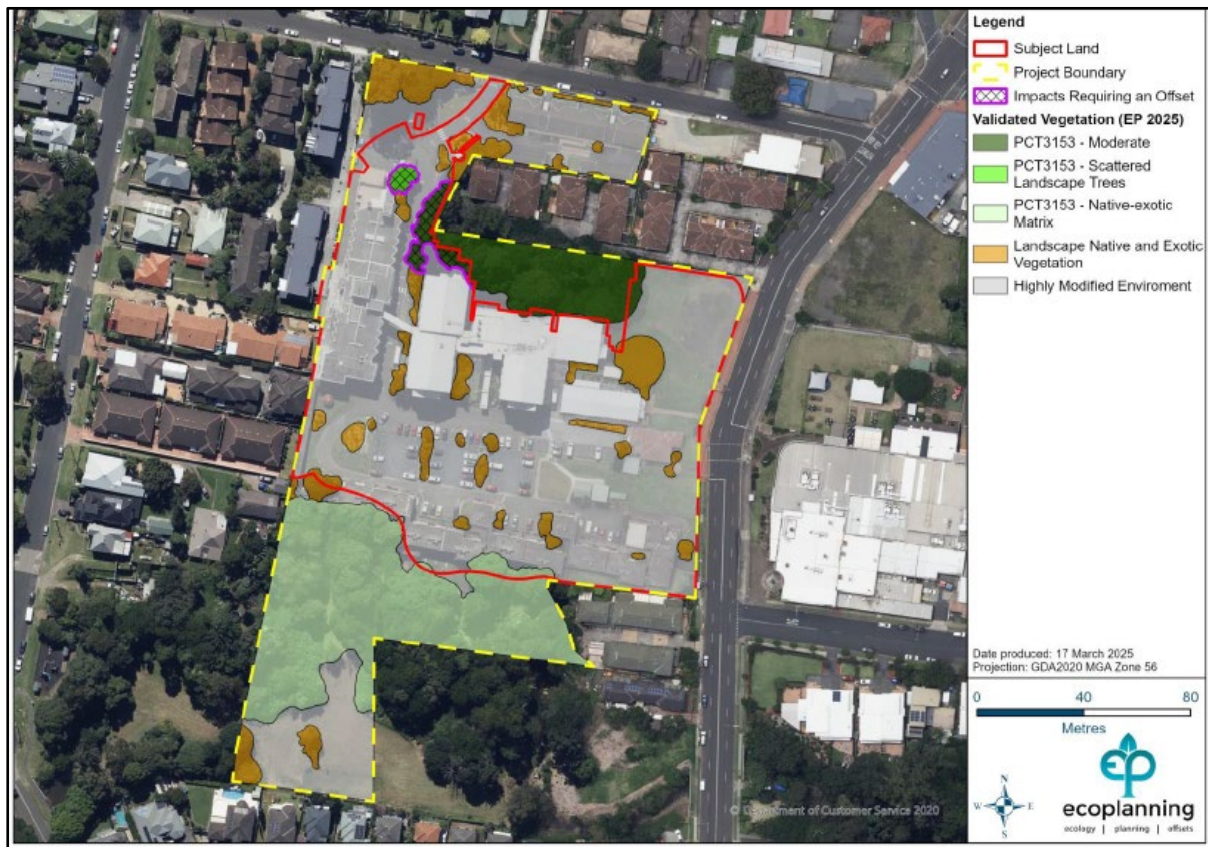


IMAGE 38 – VEGETATION AREAS REQUIRING OFFSET (ECOPLANNING)

Riparian Corridor

The proposal involves development within the riparian corridor of Collins Creek (3rd order stream). Under the Water Management Act 2000 (VM Act) the development will trigger the need for a Controlled Activity Approval.

The Natural Resources Access Regulator (NRAR) guidelines (NRAR 2022) require a Vegetated Riparian Zone (VRZ) either side of mapped watercourses. The width of the VRZ is predetermined and standardised for watercourses based on the Strahler order. Given Collins Creek is a 3rd order stream, a 30 m buffer is required on either side of the channel. Open lawn areas, on-site detention basins with plantings, pickleball courts, BBQ area and a community garden are proposed within the outer 50% of the riparian corridor as illustrated in the Landscape Concept Plan (Appendix U).

The NRAR guideline provides an averaging rule, allowing encroachment into the outer 50% of the VRZ, so long as the average width of the VRZ width may be used for non-riparian uses including asset protection zones, recreational areas, roads,



development lots and infrastructure. However, an equivalent area connected to the riparian corridor must be added to the VRZ and the inner 50% of the VRZ must be fully protected and vegetated with native endemic riparian plant species (NRAR 2022).

The VRZ and offsets has been addressed with the BDAR report, Architectural Plans and Landscape Design Report (Arcadia 2025). A future VMP will provide future vegetation management options for the ongoing management of the riparian corridor. It is intended that the VMP will be provided as part of the Construction Certificate applications and any Controlled Activity Approval applications required.

Heritage

The site is located within the Wollongong City Council. The principal environmental planning instrument for the site is the Wollongong Local Environmental Plan 2009 (LEP 2009). The site contains a heritage item ('Former Woonona Uniting Church') and lies within the vicinity of other heritage items listed by Schedule 5 Part 1 of the LEP 2009.

The heritage item on the site will be retained. For this purpose, a Statement of Heritage Impact (Appendix CC) has been prepared for the proposal by Wier Phillips Heritage required Planning Secretary's Environmental Assessment Requirements (SEARs).

The site originally formed the grounds of the Woonona Methodist Church, which was constructed c. 1909. Later additions included a school hall (1923), church hall (1930) and a timber manse (1963). These structures can be seen below in a c. 1965 aerial photograph (Image 39). When the site was gazetted as a local heritage item under the Wollongong LEP 1990, it was given a lot boundary curtilage defined as the original boundaries, as outlined in red. This curtilage was retained when the site was purchased by the Illawarra Retirement Trust in 1999 and the lots consolidated (Image 40). Sometime after 2005, both manse and school hall were demolished and the existing Flametree Residential Care Facility building constructed within the heritage curtilage.

The State Heritage Inventory provides the following Statement of Significance for the 'Former Woonona Uniting Church', otherwise known as 'Blue Gum Sanctuary':

Woonona Uniting Church is of significance for the local area for historical and aesthetic reasons, for social significance that it has for its congregation, and as representative of Interwar period church buildings. The building is an important element in the streetscape of Woonona providing a visual link in the historical development pattern of the village. It is demonstrative of the evolving history of the Methodist/Uniting Church congregation. Being the third building of the congregation (the earlier two have been lost) it indicates the growth and development of the congregation. As an active place of public

worship, this location continues to be a substantial part of village life in Woonona over the last 90 years. The building makes an important contribution to the streetscape and the site presents a local landmark.

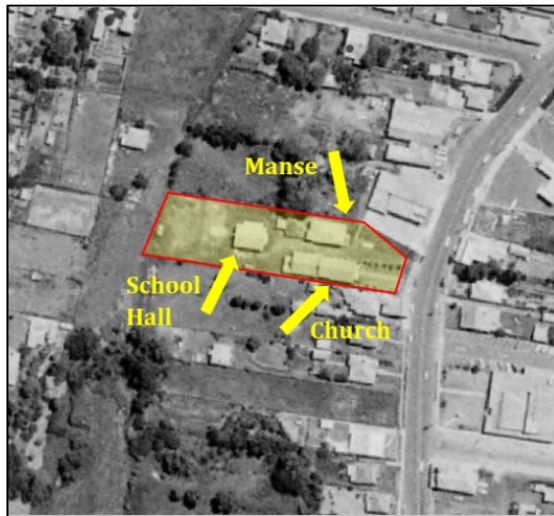


IMAGE 39 – 1965 AERIAL PHOTOGRAPH OVER WOONONA. THE SITE BOUNDARIES ARE OUTLINED IN RED. (SOURCE: NSW HISTORICAL IMAGERY)



IMAGE 40 – AERIAL PHOTOGRAPH OVER THE SITE. THE WHOLE OF THE SITE IS OUTLINED IN GREEN, WHILE THE HERITAGE OVERLAY IS OUTLINED IN RED AND SHADED LIGHT BROWN. (SOURCE: MECONE MOSAIC)

There are five heritage items listed by Schedule 5 Part 1 of the *Wollongong LEP 2009* within the vicinity of the site:

- 'Woonona Industrial Co- Operative Society', Nos. 20-22 Ball Street, Woonona – This item is located to the north of the site and is separated from it by a distance of at least 75m. The setting of the item includes single-storey 20th century period buildings and two and three-storey infill. The principal view corridor towards the item is from directly outside on Ball Street. There are no existing views at ground level between the item and the subject site.
- 'Woonona post office', No. 430 Princes Highway, Woonona – This item is located to the north of the site and is separated from it by a distance of at least 20m. The setting of the item includes single-storey 20th century period buildings and two and three-storey infill. The principal view corridor towards the item is from directly outside on either Princes Highway or Popes Road. There are existing limited views at ground level between the item and the subject site.
- 'Woonona Public School', No. 5A Gray Street, Woonona – This item is located to the east of the site and is separated from it by a distance of least 185m. The setting of the item includes single-storey 20th century period dwellings. The principal view corridor towards the item is from directly outside on Gray Street, with secondary view corridors on Nicholson Road



and Liddle Street. There are existing limited views at ground level between the item and subject site, however, the focus of the item comprising a group of school buildings has no visibility from the site.

- 'Woonona Bulli School of Arts', No. 479 Princes Highway, Woonona – This item is located to the southeast of the site and is separated from it by a distance of at least 130m. The principal view corridor towards the item is from directly outside on Princes Highway. There are no existing views at ground level between the item and the subject site.
- 'Pendlebury Rest Park', Corner Princes Highway and Gray Street, Woonona – This item is located to the southeast of the site and is separated from it by a distance of at least 200m. The setting of the item includes single-storey 20th century period dwellings and two-storey contemporary development. The principal view corridor towards the item is from directly outside on either Princes Highway or Gray Street. There are no existing views at ground level between the item and the subject site.

The proposed adaptive re-use will help to conserve the heritage significance of the 'Former Woonona Uniting Church' by giving it a viable use that will raise the necessary funds for its long-term maintenance. The proposed restaurant use requires minor alterations that are confined to areas that have already undergone change, or are not readily visible. The fit-out will be minimally fixed into stud walls and will be easily reversible. Significant fabric including tiled floors and timber lined ceilings will be retained. The new kiosk and pavilion will present as visually subordinate in scale and materiality to the retained heritage item.

The proposed redevelopment of the site for seniors housing has been carefully designed to minimize the impact on the 'Former Woonona Uniting Church'. This is demonstrated through the sensitive siting of new buildings outside of significant view corridors towards the redundant church building. The buildings are well-designed and will read with a clearly contemporary aesthetic that sits comfortably in the setting of the item.

The buildings will be constructed of high-quality materials that will help to break up the massing, while new landscaping will help to soften the interface between the buildings and the item. The proposed works will, overall, have an acceptable impact on the ability of the public to understand and appreciate the heritage significance of the 'Former Woonona Uniting Church' as a Federation period redundant church building.

The proposal is compatible with the relevant heritage controls and adequately addresses environmental impacts and mitigation measures as required by SEARS Item 20.



Aboriginal Cultural Heritage

An Aboriginal Cultural Heritage Assessment (ACHA) was undertaken by Austral Archaeology (Appendix C) to assess the archaeological potential for Aboriginal material as part of a State Significant Development being prepared under Part 5 of the *Environmental Planning and Assessment Act 1979*, before the proposed residential development 4-6 Popes Road, Woonona. The ACHA has been undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a), the *Guide to Investigating, assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011) and the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010b) [Consultation Requirements].

The background research found the study area has low archaeological potential due to significant ground disturbance caused by the construction of buildings, amenities, roads and landscaping within the highly developed urban areas of the site. Most landforms within the study area have undergone previous constructions and earthworks, besides a small southern portion of undeveloped land. A search of the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) database was conducted on 31 October 2023 by Austral Archaeology (Client service ID: 835004). The results from the AHIMS search identified 79 previously recorded sites and 2 Aboriginal Places within a 5-kilometre radius of the study area. None of these registered sites are located within the study area. The two Aboriginal Places within the search Radius are Bellambi Point and Sandon Point, both of which are not within or directly near the study area.

During the site inspection a culturally modified scar tree, outside of the scope of the works was recorded in the study area (AHIMS #52-2-4988). This scarred tree was registered as an Aboriginal site as per the request of the Representative Aboriginal Parties (RAPs) present during the investigations. The findings consider it is unlikely there are further culturally modified trees, grinding grooves, rock shelters or art sites in the study area, due to the lack of suitable rock outcrops. It is recommended any future works should avoid the culturally modified scarred tree and the areas of moderate archaeological potential in the south of the study area. Archaeological research in the form of an ACHA with archaeological test excavation and consultation with the Aboriginal community is recommended if these areas are to be impacted.

The proposed works are to occur only in areas in which buildings have already been developed. Multiple buildings are to be demolished under a previously accepted Development Application (DA). The development includes the construction of 85 to 95 independent living units, as well as a basement level, social and wellness centre, and a clubhouse. Other buildings within the study area will be retained and refurbished.

Stormwater

The subject site is identified as being affected by flooding. There are two key flow paths traversing the site including:

- Collins Creek, a perennial 3rd (Strahler) order urban watercourse, traverses the southern portion of the study area. The watercourse length within the study area is approximately 200 metres, flowing west to east towards the south-east corner of the study area. The channel is well defined for large portions of the reach length, with an existing creek bed and steep banks (particularly the northern bank).
- Stormwater line, mapped by Wollongong City Council, is situated in the northern section of the study area and is approximately 70 metres in length. Three stormwater outlets were recorded within the channel. The stormwater line flows from west to east as detailed in Image 41 and the Stormwater (Appendix R).



IMAGE 41 – PROPOSED AREA OF EXCAVATION AND SPILLWAY AT THE STORMWATER LINE AND OVERLAND FLOW DIVERSION CHANNEL AROUND BUILDING E (ACOR CONSULTANTS)

It is noted that the stormwater line in the north has not been mapped on the Hydro Line Spatial Data Map (DPIE, 2018) and does not require a Controlled Activity Approval, however Collins Creek is a mapped Hydro Line and requires a Controlled Activity Approval.

Flooding

A Flood Impact Assessment has been prepared by ACOR Consultants (Appendix R), which assessed the proposed development with respect to flood management. Catchment Simulation Solutions were engaged by ACOR Consultants to undertake



flood model simulations for existing and proposed development conditions at the site. A Flood Emergency Response Plan (FERP) (Appendix Q) has also been prepared by Water Technology for the proposed redevelopment and details the most appropriate flood emergency management strategy for the site utilising data from site specific modelling undertaken by Catchment Simulation Solutions (2025). Flooding is further addressed in response to Clause 5.21 (Flood Planning) in Wollongong LEP 2009.

Proposed buildings are demonstrated to provide floor levels that meet the required Flood Planning Levels, providing 0.5 m freeboard above the Probable Maximum Flood level. The proposed development does not involve changes within the floodplain of the Collins Creek flow path in the southern portion of the site. Results of the flood impact assessment demonstrate no material change or actionable nuisance to flood characteristics in the Collins Creek flow path for the range of simulated flood events.

In consultation with the flood management and flood design controls implemented throughout the development, a civil engineering strategy for the site has been developed which provides a best fit solution within the constraints of the existing landform, structures and pavements, and the proposed architectural layout. A Stormwater Concept design has been prepared by ACOR in accordance with WDCP 2009 Chapter E13 and Chapter E14 (attached to the application).

Further to this, WSUD measures will be incorporated into the stormwater management plan for the site is prepared by ACOR. A stormwater treatment train and MUSIC modelling has been undertaken which involves the capture of stormwater run-off from hard surfaces such as roads, paving and roof areas within the site, and the filtration of this water through water quality initiatives such as rain gardens, swales and rainwater tanks, prior to discharge into the Collins creek outlet to the south.

Waste Management

An Operational WMP has been prepared by Elephants Foot Recycling Solutions. The operational WMP identifies the different waste streams likely to be generated during the operational phase of the development, as well as how the waste will be handled and disposed, details of bin sizes/quantities and waste rooms, descriptions of the proposed waste management equipment used, and information on waste collection points and frequencies.

Sufficient storage of waste is available within each of the apartments whereby residents may then dispose of waste in their individual waste storage facility. The residents will be provided with areas within their properties to house their waste and recycling bins. Residents will be responsible for correct waste segregation and housing their bins within their properties in areas that does not affect neighbouring



properties. Residential common areas such as lobbies, amenities and circulation areas will be supplied with suitably branded waste and recycling bins where considered appropriate. These areas generate minimal waste, however general waste and recycling receptacles should be placed in convenient locations.

Based on the estimated waste generated by the residential component of this development, the recommended bin quantities and collection frequencies are as follows:

General Waste: 13 x 660L bins collected **1 x weekly**

Recycling: 37 x 240L bins collected **fortnightly**

FOGO Waste: 7 x 240L bins collected **1 x weekly**

Service Bins: 3 x 660L bins

Cost of Works

The cost of works for the purpose of determining the SDDA fee for the proposed development has been calculated in accordance with Clause 255(1) of the EPAR 2000 and is \$121, 999, 198 excluding GST. The cost of works is detailed in the Quantity Surveyors Cost Estimate prepared by MBM (Appendix P).



Statutory Context

Development consent will be sought under 'Division 4.7 - State Significant Development' of the EP&A Act. Section 4.36(2) of the EP&A Act states that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

State Environmental Planning Policy (Planning Systems) 2021

Chapter 2 State and Regional Development

Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 lists development that is declared State significant development. Section 28 of Schedule 1 states:

Development for the purposes of seniors housing if—

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

As the proposed development is for the purposes of seniors housing with an EDC of more than \$30 million and includes a residential care facility, it is declared State significant development.

Section 4.5 of the EP&A Act and Section 2.7 of *State Environmental Planning Policy (Planning Systems) 2021* stipulate that the consent authority is the Minister for Planning and Public Spaces (or the Department of Planning, Housing and Infrastructure t as their delegate) unless the development triggers the matter set out in Section 2.7(1) in which case the consent authority will be the Independent Planning Commission.

State Environmental Planning Policy (Biodiversity and Conservation) 2021

The purpose of the State Environmental Planning Policy (SEPP) (Biodiversity and Conservation 2021 is to promote the protection and improvement of key environmental assets for their intrinsic value and the social and economic benefits they provide.

Chapter 2 Vegetation in non-rural areas



The aims of this Chapter are:

- (a) to protect the biodiversity values of trees and other vegetation in non-rural areas of the State, and*
- (b) to preserve the amenity of non-rural areas of the State through the preservation of trees and other vegetation.*

This Chapter applies to land zoned R2 and E3 and therefore applies to the development. A Biodiversity Development Assessment Report (BDAR) has been prepared by Ecoplanning in accordance with Biodiversity Assessment Methodology (2020) to assess the impacts to biodiversity values, including vegetation communities and species habitats, associated with the proposed development application for the redevelopment of the existing seniors housing.

Impacts have been avoided and minimised, though the proposal would result in some unavoidable impacts to biodiversity. The proposal will remove 0.03 ha of PCT 3153 in a 'Moderate' condition (see [Image 38](#)). PCT 3153 is a tall, wet forest found along creeks on the Illawarra Escarpment, dominated by Bangalay and Blue Gum trees, providing important habitat for native wildlife and supporting healthy waterways. The biodiversity offset requirement for residual impacts of the proposed development has been calculated and presented in accordance with Section 10 of the BAM. The Credit Payment Report generated from the BAM Calculator is included in this report. A total of one ecosystem credit and one species credit is required to offset the proposed impacts.

State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004

This policy aims to encourage sustainable residential development (i.e. the BASIX scheme). It seeks to deliver equitable, effective water and greenhouse gas reductions across the State.

The SEPP operates in conjunction with the EPAR 2000 to ensure the effective introduction of BASIX in NSW.

In accordance with Clause 6(1) of the SEPP, BASIX applies to BASIX affected development as defined by the Regulations. The proposed development is defined as BASIX affected development as it involves the erection of a BASIX affected building (i.e. a building that contains one or more dwellings but does not include a hotel or motel).

The proposal has been designed to achieve the appropriate BASIX classification as required, and the relevant certification by Credwell is attached for consideration. An Ecologically Sustainable Development (ESD) Statement has also been prepared by Credwell.



Potential further development of IRT's sustainability initiatives will target the Net Zero Action Plan outlined by Greenstar by 2050. The initiatives will adhere to chosen recommendations by Greenstar, these may include and are not limited to:

- Optimising the efficiency of appliances
- Green wall or green roof
- Further inclusion of solar panels and battery storage
- More efficient glazing e.g. Double Glazed or Argon Filled window specifications
- Any additions to be designed for disassembly
- Any additions to achieve greater thermal mass
- Any additions to include low-embodied carbon materials
- The installation of electric vehicle charging stations

Alternative initiatives targeting sustainability may include;

- Optimising rainwater run-off and guttering solutions
- Optimising the efficiency of piping channels
- Any excess water to be diverted to bore water storage
- Efficiency and quality of water filtering systems
- Including further installation of external shading devices
- Regenerative outdoor fitness equipment
- Advanced ventilation systems

State Environmental Planning Policy (Resilience and Hazards) 2021

Chapter 4 Remediation of Land

The objective of this Chapter is to provide a consistent approach to the remediation of contaminated land across NSW. *Clause 4.6* requires Council to consider whether or not the land is contaminated and if so, it must be suitable in its contaminated state (or will be suitable after remediation) for the purpose for which the development is to be carried out.

Clause 4.6 reads as follows:-

"4.6 Contamination and remediation to be considered in determining development application

(1) A consent authority must not consent to the carrying out of any development on land unless:

- (a) it has considered whether the land is contaminated, and*
- (b) if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*



(c) if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.

(2) Before determining an application for consent to carry out development that would involve a change of use on any of the land specified in subclause (4), the consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned carried out in accordance with the contaminated land planning guidelines.

Before determining an application for consent to carry out development that would involve a change of use, the consent authority must consider a report specifying the findings of a preliminary investigation of the land concerned carried out in accordance with the contaminated land planning guidelines.

A Preliminary Site Investigation (PSI) was prepared by Douglas Partners. As required by the SEARs, a Detailed Site Investigation (DSI) was required to be undertaken. Based on the results of the DSI prepared by Soilsrock, the following recommendations are made:

The DSI by Soilsrock provides the following mitigation measures:

- A Site Construction Management Plan should be carried to classify and manage the appropriate disposal or re-use of soils arising from excavations.
- A Waste classification and validation must be undertaken (in accordance with the "Waste Classification Guidelines, Part 1: Classifying Waste" NSW EPA (2014)) for all soils and rock excavated prior removed from the site.
- Prior to the commencement of building demolition, a Hazardous Building Materials Assessment should be conducted to confirm that hazardous materials are not present.
- An Unexpected Finds Protocol should be prepared when site is developed to manage unexpected asbestos containing materials encounter from demolition works of existing Buildings.
- Further topsoils sampling and contamination assessment within the footprint of the buildings Ribbonwood Building RCF, Blueberry Ash Apartments and Rectory after the demolition and site rubble removal to confirm if those remaining areas are with all potential contaminant's concentration values below the adopted assessment criteria for the proposed land use.
- Regarding the probably presence of groundwater above the bulk excavation level proposed for the redevelopment buildings construction (refer to Geotechnical Report prepared by Soilsrock Engineering dated 19 May 2025 Rev 1), dewatering works probably will be required, therefore it is recommended prior to start the excavation and dewatering works, that



groundwater contamination screen testing levels are carried out to confirm that groundwater can be disposed properly off site or into Council or Sydney Water or Water NSW assets, proper official permissions should be sought. A proper dewatering management plan should be prepared to ensure that all dewatering it will be carried out properly with the necessary local authorities' permissions.

- Imported material to the site should be assessed for potential contamination in accordance with NSW EPA guidelines, to confirm the suitability of the intended land use, or be classified as Virgin Excavated Natural Material (VENM).

State Environmental Planning Policy (Transport and Infrastructure) 2021

Chapter 2 Infrastructure

The aim of this chapter is to facilitate the effective delivery of infrastructure across the State. It also provides for consultation with relevant public authorities during the assessment process or prior to development commencing.

The Chapter applies across the State and therefore applies to the subject site. The following provisions are relevant to the proposal:

- Clause 2.118 - Development with frontage to classified road;
- Clause 2.119 - Impact of road noise or vibration on non-road development; and
- Clause 2.121 - Traffic-generating development

Development with frontage to classified road (CI 2.118)

The objectives of this clause are:

- (a) to ensure that new development does not compromise the effective and ongoing operation and function of classified roads, and*
- (b) to prevent or reduce the potential impact of traffic noise and vehicle emission on development adjacent to classified roads.*

Subclause (2) specifically provides that:

- (2) The consent authority must not grant consent to development on land that has a frontage to a classified road unless it is satisfied that—*
 - (a) where practicable and safe, vehicular access to the land is provided by a road other than the classified road, and*
 - (b) the safety, efficiency and ongoing operation of the classified road will not be adversely affected by the development as a result of—*
 - (i) the design of the vehicular access to the land, or*
 - (ii) the emission of smoke or dust from the development, or*



- (iii) the nature, volume or frequency of vehicles using the classified road to gain access to the land, and*
- (c) the development is of a type that is not sensitive to traffic noise or vehicle emissions, or is appropriately located and designed, or includes measures, to ameliorate potential traffic noise or vehicle emissions within the site of the development arising from the adjacent classified road.*

The development has a frontage to the Princes Highway and Pope's Road. The existing site has traditionally allowed for historical access from Pope's Road and the new development proposes to retain this arrangement.

Impact of road noise or vibration on non-road development (Clause 2.119)

This clause applies to any development for residential accommodation on land in or adjacent to the road corridor for a freeway, a tollway or a transitway or any other road with an annual average daily traffic volume of more than 20,000 vehicles a rail corridor that the consent authority considers likely to be affected by noise and vibration.

In accordance with *Subclause 3*, the consent authority must not grant consent to the development unless it is satisfied that appropriate measures will be taken to ensure that the following LAeq levels are not exceeded:

- (a) in any bedroom in the residential accommodation—35 dB(A) at any time between 10.00 pm and 7.00 am;*
- (b) anywhere else in the residential accommodation (other than a garage, kitchen, bathroom or hallway)—40 dB(A) at any time.*

For this purpose, a Noise Impact Assessment (Appendix V) has been prepared by Acoustic Logic and is attached to the application for consideration and concludes:

External noise intrusions into the proposed development were assessed using the measured traffic noise levels reported above as a basis.

Calculations were performed considering the orientation of windows, the total area of glazing, façade transmission loss and room sound absorption characteristics. In this way the likely interior noise levels can be predicted. Acoustic treatment required to ensure compliance with the assessment criteria are detailed in this section.

Internal noise levels will primarily be as a result of noise transfer through the windows and doors as these are relatively light building elements that offer less resistance to the transmission of sound. Noise transfer through the masonry elements will not be significant and need not be considered further.



The constructions necessary to achieve the noise levels are detailed below. The predicted noise levels have been based on the expected level and spectral characteristics of the external noise, the area of building elements exposed to traffic, aircraft and rail noise, the absorption characteristics of the rooms and the noise reduction performance of the building elements.

The Noise Impact Assessment (Appendix V) includes recommended mitigation measures for construction including:

- Minimum glazing for windows and doors with acoustic seals
- Thicker entry doors
- External roof and ceiling construction
- External wall construction
- Natural ventilation requirements

The assessment includes recommendations for mitigation measures for ongoing noise emissions including:

- Mechanical plant noise emissions
- Loading dock
- Construction noise and vibration

Acoustic Logic prepared a Demolition Noise and Vibration Management Plan for the proposed development for demolition and construction noise generation including:

- Hours of work
- Quiet work methods
- Monitoring
- Perimeter fencing
- Community consultation
- Powered hand tools
- Vehicle noise
- Materials handling/vehicles
- Complaints handling
- Site induction
- Contingency plans.

The potential impacts of the proposed development on existing and future residents have been considered and acceptable mitigation measures have been included to ensure that residents are not unduly affected by road noise and vibration.

Traffic-generating development (CI 2.121)

This clause applies to a new premises of the relevant size or capacity (2,500m² in gross floor area) on a site that has direct vehicular or pedestrian access to a classified road or to a road that connects to a classified road.



In accordance with *Subclause 3*, the consent authority must not grant consent to the development unless it has given written notice of the application to RMS within 7 days after the application is made, and has taken into consideration:

- (i) any submission that RMS provides in response to that notice within 21 days after the notice was given (unless, before the 21 days have passed, RMS advises that it will not be making a submission), and*
- (ii) the accessibility of the site concerned, including—*
 - (A) the efficiency of movement of people and freight to and from the site and the extent of multi-purpose trips, and*
 - (B) the potential to minimise the need for travel by car and to maximise movement of freight in containers or bulk freight by rail, and*
- (iii) any potential traffic safety, road congestion or parking implications of the development.*

In this regard, it is expected that the proposal will be submitted to Transport for New South Wales – TfNSW). The application includes a Transport and Accessibility Impact Assessment prepared by Stantec which provide Council with information on the issues for consideration. The findings of these reports and any recommendations received from the RMS can be conditioned as part of the consent.

State Environmental Planning Policy (Housing) 2021

Chapter 3, Part 5 Housing for seniors and people with a disability

State Environmental Planning Policy (Housing) 2021 (Housing SEPP) applies to the proposed seniors housing development. Chapter 3, Part 5 Housing for Seniors and people with a disability is relevant to the development. The proposed development is for seniors housing development and is development for independent living units under the Housing SEPP 2021. An assessment of Chapter 3, Part 5 of the SEPP (Housing 2021) is provided below. A summary of the key development standards and a preliminary review of the proposed development is provided below:



TABLE 5 – COMPLIANCE TABLE – ASSESSMENT AGAINST SEPP HOUSING 2021

Design Criteria	Requirement	Comment	Compliance
Division 1 Land to which Part applies			
79 Land to which Policy applies	<p>This Part applies to land in the following zones—</p> <ul style="list-style-type: none"> (a) Zone RU5 Village, (b) Zone R1 General Residential, (c) Zone R2 Low Density Residential, (d) Zone R3 Medium Density Residential, (e) Zone R4 High Density Residential, (e1) Zone E1 Local Centre, (e2) Zone E2 Commercial Centre, (e3) Zone E3 Productivity Support, (e4) Zone MU1 Mixed Use, (f) Zone B1 Neighbourhood Centre, (g) Zone B2 Local Centre, (h) Zone B3 Commercial Core, (i) Zone B4 Mixed Use, (j) Zone B5 Business Development, (k) Zone B6 Enterprise Corridor, (l) Zone B7 Business Park, (m) Zone B8 Metropolitan Centre, (n) Zone SP1 Special Purposes, (o) Zone SP2 Infrastructure, (o1) Zone SP4 Enterprise under the following local environmental plans— <ul style="list-style-type: none"> (i) Canada Bay Local Environmental Plan 2013, (ii) Central Coast Local Environmental Plan 2022, (iii) Penrith Local Environmental Plan 2010, (iv) Pittwater Local Environmental Plan 2014, (v) Port Macquarie-Hastings Local Environmental Plan 2011, (vi) Sutherland Shire Local Environmental Plan 2015, (vii) The Hills Local Environmental Plan 2019, (viii) Warringah Local Environmental Plan 2011, (o2) Zone SP5 Metropolitan Centre, (p) Zone RE2 Private Recreation 	The site is zoned R2 Low Density Residential and E3 Productivity Support, and seniors housing is permitted on the land.	Yes
80 Land to which Part does not apply—general	<p>(1) This Part does not apply to the following land—</p> <ul style="list-style-type: none"> (a) land to which Warringah Local Environmental Plan 2000 applies that is located within locality B2 (Oxford Falls Valley) or C8 (Belrose North) under the Plan, (b) land described in Schedule 3. <p>Schedule 3 Environmentally sensitive land</p>	N/A	<p>N/A</p> <p>N/A</p>



	<p>section 80(1)(b) Land shown cross-hatched on the Bush Fire Evacuation Risk Map. Land identified as coastal wetlands and littoral rainforests area within the meaning of State Environmental Planning Policy (Resilience and Hazards) 2021, Chapter 2. Land identified as coastal vulnerability area within the meaning of State Environmental Planning Policy (Resilience and Hazards) 2021, Chapter 2. Land declared as an area of outstanding biodiversity value under the Biodiversity Conservation Act 2016 section 3.1. Land identified on the Map within the meaning of the Biodiversity Conservation Regulation 2017 section 7.3. Land identified in another environmental planning instrument as follows— (a) (Repealed) (b) open space, (c) natural wetland.</p> <p>(2) Nothing in Schedule 3 operates to preclude the application of this Part to land only because—</p> <p>(a) the land is identified under State Environmental Planning Policy (Resilience and Hazards) 2021, Chapter 2, or</p> <p>(b) in relation to land used for the purposes of an existing registered club—the land is described in another environmental planning instrument as— (i) private open space, or (ii) open space where dwellings or dwelling houses are permitted.</p>	<p>Not identified as environmentally sensitive land under Schedule 3.</p> <p>N/A - the land is not identified under State Environmental Planning Policy (Resilience and Hazards) 2021, Chapter 2</p> <p>N/A - the land is not used for an existing registered club.</p>	<p>N/A</p> <p>N/A</p>
<p>81 Seniors housing permitted with consent</p>	<p>Development for the purposes of seniors housing may be carried out with development consent— (a) on land to which this Part applies, or (b) on land on which development for the purposes of seniors housing is permitted under another environmental planning instrument.</p>	<p>Seniors Housing is permitted with consent in the R2 Low Density Residential zone and E3 Productivity Support zone in Section 79 of Housing SEPP (2021).</p>	<p>Yes</p>
<p>Division 2 Preliminary</p>			
<p>82 Definitions</p>	<p>Noted</p>		
<p>83 Amendments to the bush fire</p>	<p>(1) The Planning Secretary may prepare maps for the purposes of</p>	<p>The site is not identified as being affected by bushfire.</p>	<p>N/A</p>



<p>evacuation risk map</p>	<p>amending or replacing the Bush Fire Evacuation Risk Map.</p> <p>(2) In preparing a map, the Planning Secretary must consider the following matters—</p> <p>(a) the size of the existing population within the locality,</p> <p>(b) age groups within the population and the number of persons within the age groups,</p> <p>(c) the number of hospitals and other facilities, including the number of beds, providing care to the residents of the facilities within the locality,</p> <p>(d) the number of schools within the locality and the number of students at the schools,</p> <p>(e) existing development within the locality that has been carried out under this Part,</p> <p>(f) recommendations, if any, made by the NSW Rural Fire Service.</p>		
<p>Division 3 Development standards</p>			
<p>84 Development standards—general</p>	<p>(1) This section applies to development for the purposes of seniors housing involving the erection of a building.</p> <p>(2) Development consent must not be granted for development to which this section applies unless—</p> <p>(a) the site area of the development is at least 1,000m², and</p> <p>(b) the frontage of the site area of the development is at least 20m measured at the building line, and</p> <p>(c) for development on land in a residential zone where residential flat buildings are not permitted—</p> <p>(i) the development will not result in a building with a height of more than 9.5m, excluding servicing equipment on the roof of the building, and</p> <p>(ii) if the roof of the building contains servicing equipment resulting in the building having a height of more than 9.5m—the servicing equipment complies with subsection (3), and</p> <p>(iii) if the development results in a building with more than 2 storeys—the additional storeys are set back within planes that project at an angle of 45 degrees inwards from all side and rear boundaries of the site.</p> <p>(3) The servicing equipment must—</p>	<p>Noted</p> <p>The size of the site is 29,050 square metres.</p> <p>The site frontage is greater than 20 metres wide measured at the building line.</p> <p>N/A - Residential flat buildings are permitted in the R2 zone in Wollongong LEP 2009.</p>	<p>Yes</p> <p>Yes</p> <p>N/A</p> <p>N/A</p>



	<p>(a) be fully integrated into the design of the roof or contained and suitably screened from view from public places, and (b) be limited to an area of no more than 20% of the surface area of the roof, and</p> <p>(c) not result in the building having a height of more than 11.5m.</p> <p>(4) Subsection (2)(a) and (b) do not apply to development the subject of a development application made by the following— (a) the Aboriginal Housing Office or the Land and Housing Corporation, (b) another social housing provider.</p>	<p>(a) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and (b) be limited to an area of no more than 20% of the surface area of the roof, and</p> <p>(c) does not result in the building having a height of more than 11.5m.</p> <p>The application is being made on behalf of the Illawarra Retirement Group (IRT) who are a registered social housing provider, however compliance with 2(a) and (b) has been achieved.</p>	<p>N/A. It is noted that the areas of building height breach are largely for areas of servicing equipment, including lift overruns and plant screening. This area makes up 9.85% (455m²/ 4619m² roof area) of the roof area that is above the permitted building height under Subsection 87(2) in the Housing SEPP 2021.</p> <p>N/A – Subsection 87(2) provides additional bonus height.</p> <p>Yes</p>
<p>85 Development standards for hostels and independent living units</p>	<p>(1) Development consent must not be granted for development for the purposes of a hostel or an independent living unit unless the hostel or independent living unit complies with the relevant standards specified in Schedule 4. (2) An independent living unit, or part of an independent living unit, located above the ground floor in a multi-storey building need not comply with the requirements in Schedule 4, sections 2, 7-13 and 15-20 if the development application is made by, or by a person jointly with, a social housing provider.</p> <p>Note— Development standards concerning accessibility and usability for residential care facilities are not specified in this Policy. For relevant</p>	<p>An assessment against Schedule 4 is included in the architectural plans.</p> <p>The application is being made by IRT who is a registered social housing provider. Clause 85 notes that Schedule 4, sections 2, 7-13 and 15-20 if the development application is made by, or by a person jointly with, a social housing provider.</p>	<p>Yes</p> <p>Yes</p>



	standards, see the <i>Building Code of Australia</i> .		
86 Development standards for seniors housing—Zones RE2, SP1, SP2 and RU5	N/A	The site is zoned R2 Low Density Residential and E3 Productivity Support.	N/A
87 Additional floor space ratios	<p>(1) This section applies to development for the purposes of seniors housing on land to which this Part applies if—</p> <p>(a) development for the purposes of a residential flat building or shop top housing is permitted on the land under Chapter 5 or another environmental planning instrument, or</p> <p>(b) the development is carried out on land in Zone E2 Commercial Centre or Zone B3 Commercial Core.</p> <p>(2) Development consent may be granted for development to which this section applies if—</p> <p>(a) the site area of the development is at least 1,500m², and</p> <p>(b) the development will result in a building with the maximum permissible floor space ratio plus—</p> <p>(i) for development involving independent living units—an additional 15% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units, or</p> <p>(ii) for development involving a residential care facility—an additional 20% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of the residential care facility, or</p> <p>(iii) for development involving independent living units and residential care facilities—an additional 25% of the maximum permissible floor space ratio if the additional floor space is used only for the purposes of independent living units or a residential care facility, or both, and</p> <p>(c) the development will result in a building with a height of not more than 3.8m above the maximum permissible building height.</p>	<p>Residential flat buildings are permitted in the R2 zone and shop top housing is permitted in the E3 zone as an additional permitted use. .</p> <p>The size of the site is 29,050 square metres.</p> <p>The development includes independent living units and a residential care facility, therefore an additional 25% of the maximum permitted FSR (0.5:1) is permitted. The allowable FSR for development on the site is 0.625:1. The development proposes an FSR of 1:1 for the RCF under the non-discretionary standards (5332m² GFA) and 0.58:1 for the remaining site area (13684m²).</p> <p>The development exceeds the maximum building height permitted in the Housing SEPP</p>	<p>Yes</p> <p>Yes</p> <p>Yes</p> <p>No. A variation is proposed to this development standard</p>



		of 12.8m (9m +3.8m bonus height).	
88 Restrictions on occupation of seniors housing	<p>(1) Development permitted under this Part may be carried out for the accommodation of only the following—</p> <p>(a) seniors or people who have a disability,</p> <p>(b) people who live in the same household with seniors or people who have a disability,</p> <p>(c) staff employed to assist in the administration and provision of services to housing provided under this Part.</p> <p>(2) Development consent must not be granted under this Part unless the consent authority is satisfied that only the kinds of people referred to in subsection (1) will occupy accommodation to which the development relates.</p>	The application is being made by IRT Group and will be occupied by those residents/staff described in a), b) and c).	Yes
89 Use of ground floor of seniors housing in business zones	<p>(1) This section applies to a building used for the purposes of seniors housing on land in a business zone.</p> <p>(2) Development consent must not be granted for development under this Part unless the part of the ground floor of the building that fronts a street will not be used for residential purposes.</p> <p>(3) Subsection (2) does not apply to a part of a building that—</p> <p>(a) faces a service lane that does not require active street frontages, or</p> <p>(b) is used for 1 or more of the following purposes—</p> <p>(i) a lobby for a residential, serviced apartment, hotel or tenanted component of the building,</p> <p>(ii) access for fire services,</p> <p>(iii) vehicular access.</p> <p>(4) Subsection (2) does not apply if another environmental planning instrument permits the use of the ground floor of the building for residential purposes.</p>	The site is zoned R2 Low Density Residential and E3 Productivity Support.	<p>The ground floor of Building E in the E3 zone will not be used for residential purposes.</p> <p>N/A - no other clause permitting the use of ground floor in the E3 zone for residential purposes.</p>
90 Subdivision	<p>(1) Development consent may be granted for the subdivision of land on which development has been carried out under this Part.</p> <p>(2) Development consent must not be granted for the subdivision of a building resulting from development carried out under this Part on land in Zone E2 Commercial Centre or Zone B3 Commercial Core.</p>	Subdivision is not proposed.	N/A



<p>91 Fire sprinkler systems in residential care facilities</p>	<p>(1) A consent authority must not grant consent for development for the purposes of a residential care facility unless the facility will include a fire sprinkler system.</p> <p>(2) Development for the purposes of the installation of a fire sprinkler system in a residential care facility may be carried out with development consent.</p>	<p>All building work will be carried out in accordance with Clause 69 of the <i>EPAR 2000</i>, which requires the consent authority to consider the provisions of the Building Code of Australia (BCA).</p>	<p>Yes - the requirements of fire sprinkler can be conditioned. Refer to notation on the plans for compliance.</p>
<p>92 Development on land used for the purposes of an existing registered club</p>	<p>N/A</p>	<p>The site does not contain an existing registered club. The development does not propose a registered club.</p>	<p>N/A</p>
<p>Division 4 Site-related requirements</p>			
<p>93 Location and access to facilities and services— independent living units</p>	<p>1) Development consent must not be granted for development for the purposes of an independent living unit unless the consent authority has considered whether residents will have adequate access to facilities and services—</p> <p>(a) by a transport service that complies with subsection (2), or</p> <p>(b) on-site.</p> <p>(2) The transport service must—</p> <p>(a) take the residents to a place that has adequate access to facilities and services, and</p> <p>(b) for development on land in the Eastern Harbour City, Central River City, Western Parkland City or Central Coast City—</p> <p>(i) not be an on-demand booking service for the transport of passengers for a fare, and</p>	<p>Access to facilities and services is available within the site, proximity of the site and there are transport services including Buses available to residents. The site is within walking distance of the Woonona town centre which provides for grocery shopping, dining, and medical service needs. Recreation and community facilities are also located within 400m of the site.</p> <p>Bulli Hospital is also just a five-minute drive away. Close by, the Wollongong Health precinct, anchored by Wollongong Hospital, brings together public and private health services, research partnerships, and supporting medical businesses.</p> <p>N/A - residents will have adequate access to services on-site and within 400m walking distance of the site. Transport services are also available through IRT's existing community buses.</p> <p>N/A - the site is outside the Greater Sydney region.</p>	<p>Yes - refer to Table 6 below detailing the nearby services and facilities.</p> <p>Yes</p>



	<p>(ii) be available both to and from the site at least once between 8am and 12pm each day and at least once between 12pm and 6pm each day, and</p> <p>(c) for development on other land—be available both to and from the site during daylight hours at least once each weekday.</p> <p>(3) For the purposes of subsections (1) and (2), access is adequate if—</p> <p>(a) the facilities and services are, or the transport service is, located at a distance of not more than 400m from the site, and</p> <p>(b) the distance is accessible by means of a suitable access pathway, and</p> <p>(c) the gradient along the pathway complies with subsection (4)(c).</p> <p>(4) In subsection (3)—</p> <p>(a) a suitable access pathway is a path of travel by means of a sealed footpath or other similar and safe means that is suitable for access by means of an electric wheelchair, motorised cart or the like, and</p> <p>(b) the distance is to be measured by reference to the length of the pathway, and</p> <p>(c) the overall average gradient must be not more than 1:14 and the gradients along the pathway must be not more than—</p> <p>(i) 1:12 for a maximum length of 15m at a time, or</p> <p>(ii) 1:10 for a maximum length of 5m at a time, or</p> <p>(iii) 1:8 for a maximum length of 1.5m at a time.</p> <p>(5) In this section—</p> <p>facilities and services means—</p> <p>(a) shops and other retail and commercial services that residents may reasonably require, and</p> <p>(b) community services and recreation facilities, and</p> <p>(c) the practice of a general medical practitioner.</p> <p>provide a booking service has the same meaning as in the Point to Point Transport (Taxis and Hire Vehicles) Act 2016, section 7.</p> <p>Note—</p> <p>Provide a booking service is defined as carrying on a business taking bookings for taxis or hire vehicles to provide passenger services, whether immediately or at a later time, and communicating the bookings to</p>	<p>N/A. - Facilities and services, located within 400m of the site via a suitable access pathway.</p>	
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	<p>consent authority must consider the <i>Seniors Housing Design Guide</i>, published by the Department in December 2023.</p> <p>(2) Development consent must not be granted to development for the purposes of seniors housing unless the consent authority is satisfied the design of the seniors housing demonstrates that adequate consideration has been given to the design principles for seniors housing set out in Schedule 8.</p>		
98 (Repealed)	N/A	N/A	N/A
Division 7 Non-discretionary development standards			
106 Interrelationship of Division with design principles in Division 6	Nothing in this division affects the operation of section 97(2).	Adequate consideration has been given to the principles set out in Division 6 as noted above.	Yes
107 Non-discretionary development standards for hostels and residential care facilities—the Act, s 4.15	N/A – no new residential care facility is proposed as part of this development. Only alterations and additions to the existing RCF.	N/A	N/A
108 Non-discretionary development standards for independent living units—the Act, s 4.15	<p>(1) The object of this section is to identify development standards for particular matters relating to development for the purposes of independent living units that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.</p> <p><i>Note—</i> <i>See the Act, section 4.15(3), which does not prevent development consent being granted if a non-discretionary development standard is not complied with.</i></p> <p>(2) The following are non-discretionary development standards in relation to development for the purposes of independent living units—</p> <p>(a) no building has a height of more than 9.5m, excluding servicing equipment on the roof of a building,</p> <p>(b) servicing equipment on the roof of a building, which results in the building having a height of more than 9.5m—</p>	<p>Noted</p> <p>The development exceeds the maximum building height permitted in Subsection 87(2) Housing SEPP of 12.8m (9m +3.8m bonus height).</p> <p>(b) servicing equipment is located above 9.5m but exceeds 11.5m. A variation is proposed to</p>	<p>No. Non-discretionary not relied upon. A variation is proposed to this development standard.</p> <p>No. Non-discretionary not relied upon.</p>



	<p>(i) is fully integrated into the design of the roof or contained and suitably screened from view from public places, and</p> <p>(ii) is limited to an area of no more than 20% of the surface area of the roof, and</p> <p>(iii) does not result in the building having a height of more than 11.5m</p> <p>(c) the density and scale of the buildings when expressed as a floor space ratio is 0.5:1 or less,</p> <p>(d) a minimum landscaped area that is the lesser of—</p> <p>(i) 35m² per dwelling, or</p> <p>(ii) 30% of the site area,</p> <p>(e) (Repealed)</p> <p>(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,</p> <p>(g) at least 70% of the dwellings receive at least 2 hours of direct solar access between 9am and 3pm at mid-winter in living rooms and private open spaces,</p> <p>(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—</p> <p>(i) at least 15m² of private open space per dwelling, and</p> <p>(ii) at least 1 private open space with minimum dimensions of 3m accessible from a living area located on the ground floor,</p> <p><i>Note—</i> <i>The open space needs to be accessible only by a continuous accessible path of travel, within the meaning of AS 1428.1, if the dwelling itself is an accessible one—see Schedule 4, section 2.</i></p> <p>(i) for a dwelling in a multi-storey building not located on the ground floor—a balcony accessible from a</p>	<p>Clause 87 under the bonus building height.</p> <p>(c) the FSR exceeds the FSR of 0.5:1 under the bonus provisions in Subsection 87(2),.</p> <p>(d) the minimum landscaped area provided is: 10, 549m² total landscaped area Which equates to 36% of the site. There are 98 dwellings proposed and 35m² per dwelling is equal to 3,430m². The landscaped area exceeds the minimum requirements.</p> <p>(f) 42% of the site is proposed as deep soil zone which is in excess of 15% of the site area. Where practicable, at least 65% of the deep soil zone is located at the rear of the site,</p> <p>(g) >70% of dwellings receive at least 2 hours of direct solar access between 9am and 3pm at mid-winter in living rooms and private open spaces,</p> <p>(h) most private open space areas comply with the minimum dimensions for POS for single story villas or ground floor units in multi storey buildings however some POS areas are below 15m² per dwelling.</p> <p>(i) areas above the minimum private space areas are provided.</p>	<p>No. Non-discretionary not relied upon. No.</p> <p>Yes.</p> <p>Yes.</p> <p>Yes.</p> <p>No – POS areas are below 15m², however substantial open space is provided on site.</p> <p>Yes.,</p>
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	<p>living area with minimum dimensions of 2m and—</p> <p>(i) an area of at least 10m², or</p> <p>(ii) for each dwelling containing 1 bedroom—an area of at least 6m²,</p> <p>(j) for a development application made by, or made by a person jointly with, a social housing provider or Landcom—at least 1 parking space for every 5 dwellings,</p> <p>(k) if paragraph (j) does not apply—at least 0.5 parking spaces for each bedroom.</p>	<p>No balconies on level 1 are less than 10m² or 2m in dimension.</p> <p>IRT Group are a social housing provider under the definition of the Housing SEPP 2021 and at least 1 parking space is required per 5 dwellings (20) spaces. A total of 127 spaces are provided for ILUs on site.</p> <p>(k) at least 0.5 parking spaces for each bedroom are provided. A total of 119 spaces are provided for 98 ILU dwellings compliant with 0.5 spaces per each bedroom. An additional 8 visitor spaces are provided on site.</p>	<p>Yes.</p> <p>Yes.</p>
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TABLE 6 – LOCATION OF SERVICES TO SITE

a) RETAIL AND SHOPPING		
Facility	Info	Distance
Supermarket: Example - Woonona Fruit Basket (2 Russell Street Woonona)	Supermarket offers fresh produce and grocery items. Other specialty food stores like bakeries and butchers may also be present along the Princes Highway.	550m (7 min walking)
Pharmacy: Example - Priceline Pharmacy Woonona (398 Princes Hwy)	Pharmacies are typically found within local shopping strips, and one would be expected along the Princes Highway section near Popes Road.	350m (5 min walking)
Newsagent & Post Office Services: Example - Australia Post Office Woonona (393 Princes Hwy)	A local newsagent, potentially offering Australia Post services, is likely accessible on the Princes Highway.	400m (6 min walking)
Cafes and Restaurants: Example - South Paradiso Café Woonona (381B Princes Hwy)	A variety of cafes, takeaway food outlets, and potentially small restaurants are situated along Princes Highway in the vicinity of Popes Road.	450m (6 min walking)
Registered Club: Woonona Bulli RSL 455 Princes Hwy, Woonona	Retired Servicemen's Club with Restaurant, Bar and Café	50m (less than 1 min walking)
Hairdressers and Beauty Salons: Example - Cheryl Anne's Hair and Beauty (395 Princes Hwy)	These personal services are common in local shopping areas and would likely be found within 400m.	400m (5 min walking)
Other Retail: Example - Salvos Stores Woonona (17 Luxor Street, Woonona)	This may include clothing boutiques, gift stores, or other specialty shops. (Salvos) provides discount retail options and is likely within the 400m radius.	550m (7 min walking)
COMMERCIAL SERVICES		
Facility	Info	Distance
Bank Branches / ATMs Example - atm Woonona (395 Princes Hwy)	Financial services are often co-located with retail hubs. Older adults may want help transferring property to family members or planning their estates. Ease of Access - Less travel and less physical strain and more independence. Regular visits to these services encourage social engagement, which is linked to better mental health.	400m (5 min walking)



<p>Real Estate Agencies Example - Laurence Morgan Woonona (Shop 2/413-415 Princes Hwy)</p>	<p>Several real estate offices are typically present in suburban commercial centres. Many seniors eventually want to move to smaller units or assisted living. Proximity to real estate experts simplifies this process. Agencies nearby often have a deep understanding of local housing trends and can provide tailored advice. Peace of Mind - Seniors and their families feel safer knowing vital services are nearby.</p>	<p>300m (4 min walking)</p>
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Schedule 8 referred to in Section 97 of the Housing SEPP 2021 is extracted below and an assessment of the requirements has been provided.

TABLE 7 – SCHEDULE 8, SECTION 97 HOUSING SEPP 2021 ASSESSMENT

Schedule 8 Design principles for seniors housing			
Design Criteria	Requirement	Comment	Compliance
<p>1 Neighbourhood amenity and streetscape</p>	Seniors housing should be designed as follows—		
	(a) to recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation,	The seniors housing development has been designed to respond to the needs of future residents and users of the site	Yes
	(b) to recognise the desirable elements of—		
	(i) the location's current character, or	<p>As detailed in the architectural plans and urban design analysis, the development has been designed with consideration of the site context and the character of the location.</p> <p>A design response is required to address flood planning to substantially reduce the current flood risk on site.</p>	Yes
	(ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area,	<p>N/A this is not a transitional area however given the size of the site, careful consideration has been applied to the design of the buildings to contribute to the quality and identify of the area.</p>	N/A
	(c) to complement heritage conservation areas and heritage items in the area,	The development has been designed with consideration of the heritage items on the site and within the vicinity of the site.	Yes
	(d) to maintain reasonable neighbourhood amenity and appropriate residential character by—		
(i) providing building setbacks to reduce bulk and overshadowing, and	Generous building setbacks have been provided to reduce bulk and overshadowing .	Yes	



	(ii) using building form and siting that relates to the site's land form, and	The building form and siting has responded to the significant site constraints including flooding, easements, the riparian corridor and the surrounding context.	Yes
	(iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and	The building heights at the street frontages at Popes Road and Princes Highway road interfaces have been carefully considered and designed to provide a compatible scale/interface with adjacent buildings. Refer to the architectural plans and urban design analysis.	Yes
	(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours,	No buildings are located directly on the boundary. The design has been developed to reduce the impact of the development on neighbours.	Yes
	(e) to set back the front building on the site generally in line with the existing building line,	The front building line proposed is consistent with the existing building line on Popes Road and Princes Highway.	Yes
	(f) to include plants reasonably similar to other plants in the street,	Additional street planting and retention of trees is proposed at interfaces with the street.	Yes
	(g) to retain, wherever reasonable, significant trees,	Trees have been retained where possible and substantial compensatory planting is provided.	Yes
	(h) to prevent the construction of a building in a riparian zone.	The building is setback from the riparian zone.	Yes
2 Visual and acoustic privacy	Seniors housing should be designed to consider the visual and acoustic privacy of adjacent neighbours and all residents of the seniors housing by—		
	(a) using appropriate site planning, including considering the location and design of windows and balconies, the use of screening devices and landscaping, and	Detailed site analysis, resident consultation, urban design analysis and landscape review has been undertaken for the proposed development.	Yes
	(b) ensuring acceptable noise levels in bedrooms of new dwellings by locating them away from driveways, parking areas and paths.	The site planning and layout has ensured the new dwellings will receive acceptable noise levels. Also refer to the acoustic report.	Yes
3 Solar access and design for climate	The design of seniors housing should—		
	(a) for development involving the erection of a new building—provide residents of the building with adequate daylight in a way that does not adversely impact the amount of daylight in neighbouring buildings, and	Suitable solar access has been provided to the building and solar impact on neighbouring buildings has been minimised.	Yes



	(b) involve site planning, dwelling design and landscaping that reduces energy use and makes the best practicable use of natural ventilation, solar heating and lighting by locating the windows of living and dining areas in a northerly direction.	The proposed development has considered sustainable and passive design principles throughout.	Yes
4 Stormwater	The design of seniors housing should aim to—		
	(a) control and minimise the disturbance and impacts of stormwater runoff on adjoining properties and receiving waters by, for example, finishing driveway surfaces with semi-pervious material, minimising the width of paths and minimising paved areas, and	Detailed stormwater and flooding assessment has been undertaken in the development of the building and landscape design.	Yes
	(b) include, where practical, on-site stormwater detention or re-use for second quality water uses.	Water sensitive urban design principles have been established for the proposed development. Also refer to the ESD strategy prepared for the development.	Yes
5 Crime prevention	Seniors housing should—		
	(a) be designed in accordance with environmental design principles relating to crime prevention, and	The architect and urban designer have undertaken further assessment to provide a development in accordance with environmental design principles relating to crime prevention.	Yes
	(b) provide personal property security for residents and visitors, and	Personal property security is provided through the development of the design and other CPTED principles will be included in the future development such as lighting and CCTV.	Yes
	(c) encourage crime prevention by—		
	(i) site planning that allows observation of the approaches to a dwelling entry from inside each dwelling and general observation of public areas, driveways and streets from a dwelling that adjoins the area, driveway or street, and	Site planning encourages observation and passive surveillance to the street and within the development.	Yes
	(ii) providing shared entries, if required, that serve a small number of dwellings and that are able to be locked, and	Shared entries to residential buildings will be secured and locked.	Yes
	(iii) providing dwellings designed to allow residents to see who approaches their dwellings without the need to open the front door.	Dwellings have been designed where possible to provide visibility at entries.	Yes
6 Accessibility	Seniors housing should—		
	(a) have obvious and safe pedestrian links from the site that provide access to transport services or local facilities, and	The development includes safe pedestrian circulation through the site and outside the site.	Yes



		Refer to the Landscape Concept Plan and Traffic Impact Assessment.	
	(b) provide safe environments for pedestrians and motorists with convenient access and parking for residents and visitors.	Safe and convenient access has been provided for residents and visitors.	Yes
7 Waste management	Seniors housing should include waste facilities that maximise recycling by the provision of appropriate facilities.	The waste facilities provide for recycling facilities for residents and visitors. Refer to Operational Waste Management Plan.	Yes

Seniors Housing Guide 2023 and Apartment Design Guide

On 14 December 2023, amendments to the Housing SEPP 2021 were made to introduce changes to the accessibility and usability standards for independent living units to align with the new *Seniors Housing Design Guide 2023* ([SHDG 2023](#)).

Chapter 3, Part 5 of the Housing SEPP outlines key development standards for seniors housing and those with disabilities, with specific site requirements. Section 97 of the Housing SEPP, introduced the new 2023 Guide. Under this provision, in determining a development application for seniors housing, consent authorities must consider the 2023 Guide and be satisfied that the design demonstrates “adequate consideration” of the Seniors Housing Design Principles outlined in Schedule 8 (Seniors Housing Design Principles). These principles cover aspects like neighbouring amenity, streetscape, privacy, solar access, climate design, stormwater management, crime prevention, accessibility and waste management.

Checklists in Part 4 of the Guide 2023, address concerns that certain guidelines like the Apartment Design Guide (ADG) conflict with seniors living housing. The 2023 Guide introduces Chapter 18.0 and Chapter 19.0 which outlines how the design criteria of the 2023 Guide align with the design criteria of the ADG, the NDIS Specialist Disability Accommodation Design Standard and the Liveable Housing Australia Guidelines.

While the ADG does not technically apply to Seniors Housing development, the Guide 2023 notes that the design of high-density seniors housing may benefit from referencing the general good design guidance set out in ADG and can be used in conjunction with seniors housing design guide where applicable. The SHDG 2023 and the ADG have been considered by the design and project team.

Design Conformance Reports (Appendix L(1) and L(2)) have been prepared by the architects Calderflower to demonstrate compliance with the SHDG and ADG based on best practice design guidance for seniors housing and apartments.

DPHI during the prelodgement phase, requested that the SSDA address the ADG design criteria and describe in detail how the proposed ILU’s align with the relevant criteria. *Chapter 4 Design of residential apartment development* of the Housing





SEPP applies the ADG to development applications and modification applications for residential apartment development. The Housing SEPP contains saving and transitional provisions at Schedule 7A, clause (2A) that requires that Chapter 4, as inserted by the amending policy, applied to the proposed development. As provided by NSW DPE, the process of consolidation does not affect the operations of the provisions or the Apartment Design Guide (ADG). This Chapter aims to deliver better living environments for residents choosing this form of housing, and to enhance our streetscapes and our neighbourhoods across the state. It does this by establishing a consistent approach to the design of apartments and the way they are assessed by councils.

The SEPP retains nine (9) design quality principles to be applied in both the design and assessment of the development, as per Schedule 9 of the SEPP Housing. In this regard, please refer to the Design Report (Appendix K) and ADG Conformance (Appendix L(1)) prepared by Calderflower Architects, which responds to the 9 principles accordingly, and how they have influenced the subject design and the proposed development objective.

In addition to this, the ADG provides key design criteria controls to aid high quality design outcomes, of which a summary is provided below and in the ADG Conformance Table prepared by Calderflower Architects (Appendix L(1)). It is considered that DPHI can be satisfied that the proposed development is consistent with the provisions of Chapter 4 of the Housing SEPP.

TABLE 8 – ADG PART 3 COMPLIANCE TABLE - SUMMARY OF KEY DESIGN CRITERIA (ADG)

Design Criteria	Requirement	Comment
3D Communal & Public Open Space	1. Communal open space has a minimum area equal to 25% of the site.	1. The communal public open space component is generous and inclusive and intended to bring vibrancy and activity to the seniors housing precinct. The Riparian Landscape areas include <ul style="list-style-type: none"> • 7, 4206m² of communal open space area - see blue shading in the extract below. This equals 25.5% of the site area. • 7, 540m² of landscaped areas is located along the riparian corridor associated with Collins Creek. • 658m² and 1152m² of landscape area is provided within the frontage to Popes Road and Princes Highway. • An additional 617m² of COS is available for RCF residents in a secure and safe enclosed area. However RCF residents where able may enjoy all landscape and open space areas throughout the site.

	<p>2. Developments achieve a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9am and 3pm on 21 June (mid winter)</p>	<p>See extract below of Sheet A012 (Appendix F).</p>  <p>2. The development achieves a minimum of 50% direct sunlight to the principal usable part of the communal open space for a minimum of 2 hours between 9am and 3pm on 21 June. Communal open space is shown in blue in the extract below (not included in Architectural Set and produced for compliance check only).</p>
	<p>3E Deep Soil Zones</p> <p>Deep soil zones for sites over 1500m² are to meet the following minimum requirements:</p> <ul style="list-style-type: none"> • Minimum Dimension: 6m • Percentage of site area: 7% <p>This would generally be provided upon a podium in conjunction with</p>	<p>The Deep Soil Zone (DSZ) is 42% of the site area and the podium zone accounts for 4.8% of the site planting over the basement - Refer to the Soil Strategy provided in Appendix (U1) - Landscape Report. While some of the landscape areas proposed are less than 6m in width, there is a generous amount of DSZ that exceeds the 6m dimension and exceeds 7% of the site area.</p>



	<p>any COS, given the shop top housing type development sought. This requirement is not deemed essential, but preferred if can be accommodated.</p>	
<p>3F Visual Privacy</p>	<p>Minimum required residential separation distances from buildings to the side and rear boundaries are as follows:</p> <p>Buildings up to 12m (4 storeys): Habitable rooms and balconies: 6m Non-habitable rooms: 3m</p>	<p>The building is designed to the following building separation:</p> <p>Sheet A404 in the Architectural Plans (Appendix F) details conformance with the ADG building separation, the following building separation has been applied:</p> <ul style="list-style-type: none"> • 12m between habitable rooms/balconies • 9m between habitable rooms and non-habitable rooms. • 6m between non-habitable rooms • 6m between habitable rooms and boundaries. <p>There are some minor breaches of the ADG separation distances between Building C and the Flametree RAC. To mitigate this privacy screening is proposed to the three-bedroom apartments in facing the sitting area and fire escape stair in the flametree building - see extracts below.</p> <p>No other breaches are identified throughout the site as illustrated in Sheet A404 and A902 (Appendix F) and Image 40 below.</p>

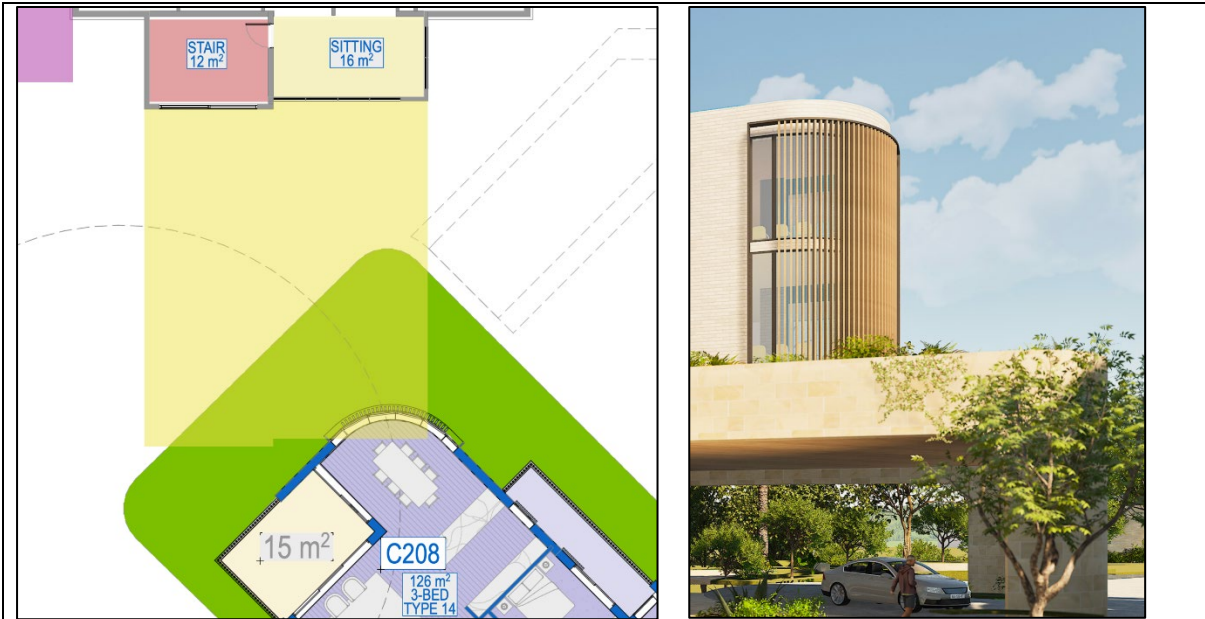


IMAGE 42 – ADG CONFORMANCE PLAN (CALDERFLOWER)



<p>3J Bicycle & Car Parking</p>	<p>Car Parking DCP Citywide Residential Parking Rates</p> <ul style="list-style-type: none"> · 1 car space per dwellings (<70m²) or 1.5 car spaces per dwelling (70-110m²) or 2 car spaces per dwelling (>110m²), plus 0.2 car parking spaces per dwelling for visitors. · 1 bicycle space per 3 dwellings (residents) and 1 bicycle space per 12 dwellings (visitors). · 1 motorcycle space per 15 dwellings. <p>Residential Car Parking</p> <ul style="list-style-type: none"> · Under SEPP 65 the applicant should use the sub-regional parking rates in the RTA Guide to Traffic Generating Development (GTTGD) for apartments in Wollongong, Dapto and Warrawong (within 400 metres of a B3 zone) if the rates are lower than the DCP parking rates. · In this case the development is 408 metres walk from the B3. On that basis the RTA GTTGD rates are able to be used. 	<p>Residential car parking rates as defined under this section are not applicable. The car parking requirements are subject to the car parking requirements as set out in Chapter 5 Chapter 3, Part 5, Division 7 Section 107 and Section 108 Non-discretionary development standards for residential care facilities and independent living units.</p>
<p>4A Solar & Daylight Access*</p>	<p>Living rooms and private open spaces of at least 70% of apartments in a</p>	<p>76% of ILUs achieve solar access and daylight access requirements.</p>



	<p>building receive a minimum of 2 hours direct sunlight between 9 am and 3 pm at mid winter in Sydney Metro Area and Newcastle and Wollongong LGA's;</p> <p>A maximum of 15% of apartments in a building receive no direct sunlight between 9 am and 3pm at mid winter.</p>	<p>15 out of 98 apartments receive no direct sunlight between 9 AM and 3 PM at mid-winter, this equals 15 %.</p> <p>Refer to Appendix F Drawings A701-A702</p>
4B Natural Ventilation	<ol style="list-style-type: none"> At least 60% of apartments are naturally cross ventilated in the first nine storeys of the building; Overall depth of a cross-through apartment does not exceed 18m, measured glass line to glass line 	<p>A total of 65 ILUs out of the total 98 ILUs proposed comply with the ADG set requirements for cross ventilation which results in 66% of ILUs achieving cross ventilation requirements.</p> <p>Apartment depths comply with this criteria. Refer to Appendix F Drawings A402-A403.</p>
4C Ceiling Heights	<p>Ground floor and first floor commercial 3.3m minimum</p> <p>Residential habitable rooms 2.7m;</p> <p>Residential non-habitable 2.4m.</p>	<p>Residential habitable and non-habitable areas achieve the minimum requirements for floor to ceiling heights.</p>
4D-1 Apartment Size & Layout	<p>Apartments are required to have the following minimum internal areas:</p> <ul style="list-style-type: none"> Studio 35m²; 1 bedroom 50m²; 2 bedroom: 70m²; 3 bedroom: 90m². 	<p>All new dwelling sizes achieve these minimum area requirements.</p>



4D-2 Apartment Environmental Performance	<ol style="list-style-type: none"> 1. Habitable room depths are limited to a maximum of 2.5 x ceiling height 2. In open plan layouts (where the living, dining and kitchen are combined) the maximum habitable room depth is 8m from a window 	<p>All ILUs would appear to accord with room depth performance.</p> <p>The proposed ILUs have clearly been designed mindful of this control.</p>
4E Private Open Space & Balconies	<p>All apartments are required to have primary balconies as follows:</p> <ul style="list-style-type: none"> • 1 bedroom apartments: 8m² area, minimum depth 2m • 2 bedroom apartments: 10m² area, minimum depth 2m • 3+ bedroom apartments: 12m² area, minimum depth 2.4m <p>Apartments at ground level or on a podium or similar structure, private open space is to be a minimum depth of 3m and area of 15m².</p>	<p>The POS for ground floor and upper ILUs areas indicated on the Architectural plans generally comply with the requirements of 4E, however strict compliance with the ADG is not required.</p>
4F Common Circulation & Spaces*	<p>The maximum apartments off a circulation core on a single level is eight.</p>	<p>The proposed circulation arrangements appear to accord with these criteria. The maximum number of ILUs off a circulation core on a single level is eight.</p>
4G Storage	<p>In addition to storage in kitchens, bathrooms and</p>	<p>Storage area schedules are provided on the Architectural plans and appear to</p>



	<p>bedrooms, the following storage is provided:</p> <ul style="list-style-type: none">• 2 bedroom apartments: 8m³• 3+ bedroom apartments: 10m³ <p>At least 50% of the required storage is to be located within the apartment.</p>	<p>accommodate sufficient storage areas for all dwellings.</p> <p>Some of the storage areas proposed comply with requirements, however strict compliance with the ADG for ILUs is not required and there are units with less storage areas.</p>
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As demonstrated in the ADG compliance assessment, the proposal substantially complies with the afore-mentioned provisions and will result in a good design outcome for the site and surrounds.

Wollongong Local Environmental Plan 2009 (WLEP 2009)

The *Wollongong Local Environmental Plan 2009 (WLEP 2009)* aims to make local environmental planning provisions for land in Wollongong in accordance with the relevant standard environmental planning instrument under section 3.20 of the Act.

The following matters of *WLEP 2009* are of particular relevance to the development as follows:

Permitted or Prohibited Development (Clause 2.1 – Clause 2.3)

The site is zoned Zone R2 Low Density Residential and E3 Productivity Support under WLEP 2009 as shown in the extract from the Land Zoning Map. Seniors housing is a permitted land use within the R2 zone. Seniors housing is not explicitly permitted in the E3 zone in the Wollongong LEP 2009, however is permitted by virtue of Division 1, Chapter 3, Part 5 of the Housing SEPP 2021 as the Part of the SEPP applies to land zoned R2 and E3. Shop top housing is also permitted in the E3 zone under Clause 34, Schedule 1 of Wollongong LEP 2009.

seniors housing means a building or place that is—

- (a) a residential care facility, or
- (b) a hostel within the meaning of [State Environmental Planning Policy \(Housing\) 2021](#), Chapter 3, Part 5, or
- (c) a group of independent living units, or
- (d) a combination of any of the buildings or places referred to in paragraphs (a)–(c),

and that is, or is intended to be, used permanently for—

- (e) seniors or people who have a disability, or
- (f) people who live in the same household with seniors or people who have a disability, or



(g) staff employed to assist in the administration of the building or place or in the provision of services to persons living in the building or place, but does not include a hospital.

Note—

Seniors housing is a type of *residential accommodation*—see the definition of that term in this Dictionary.

The social wellness centre and café/kiosk proposed can be broadly characterised as being an ancillary use to the seniors housing group term, providing additional services to residents on site, however, Division 10 Health Services Facilities of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* also permits medical centres in the R2 zone as a *prescribed zone*. The definition of health services facility in WLEP 2009 is included below:

health services facility means a building or place used to provide medical or other services relating to the maintenance or improvement of the health, or the restoration to health, of persons or the prevention of disease in or treatment of injury to persons, and includes any of the following—

- (a) a medical centre,
- (b) community health service facilities,
- (c) health consulting rooms,
- (d) patient transport facilities, including helipads and ambulance facilities,
- (e) hospital.

The adaptive reuse of the church facilitates heritage conservation initiatives that provides a positive impact on the heritage item and allows residents and visitors to interact with this heritage item. The café will serve food and drinks to dine in or takeaway for residents and visitors.

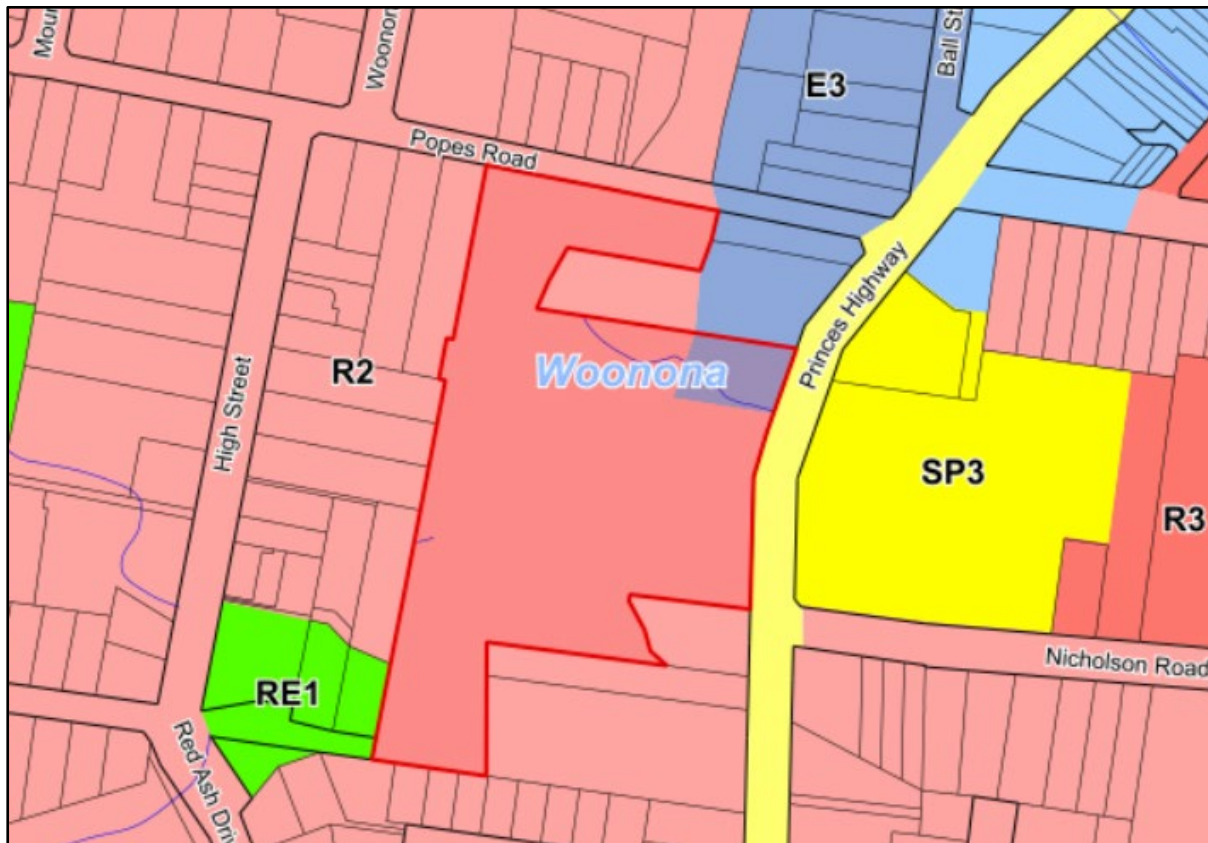


IMAGE 43 – LAND USE ZONE (SOURCE: WOLLONGONG COUNCIL)

Demolition requires development consent (Clause 2.7)

Development consent is sought through this application for the demolition of parts of the site that have not previously been approved by Council. Refer to the Appendix F – Drawing No. A007 and A008.

Height of buildings (Clause 4.3)

The subject site maps a maximum building height of 9m. The Housing SEPP 2021 however provides a non-discretionary standard of 9.5m for seniors housing development. The Housing SEPP 2021 provides a bonus height provision for seniors housing development of 3.8m above the permitted building height. 12.8m in the R2 zone and 14.8m in the E3 zone. The proposed development exceeds the maximum permitted building height of 12.8m and 14.8m (respectively) as detailed in the table below and an Exception to Development Standards request under Clause 4.6 of Wollongong LEP 2009 has been submitted to support this variation (Appendix B).

Table 9 outlines the permitted LEP and SEPP maximum building height, the proposed building height and the variation proposed at the highest point in the development. The areas of building height breach vary with the highest maximum building height breach in the R2 zone at 3.25m or 25.39% and in the E3 zone at 0.72m or 4.86%.

TABLE 9 – DESCRIPTION OF VARIATION

Land Zone	Permitted LEP Height	Bonus Height	SEPP	Proposed Height	Variation	% variation
R2 Zone	9m	12.8m		16.05m	3.250m	25.39%
E3 Zone	11m	14.8m		15.52m	0.72m	4.86%

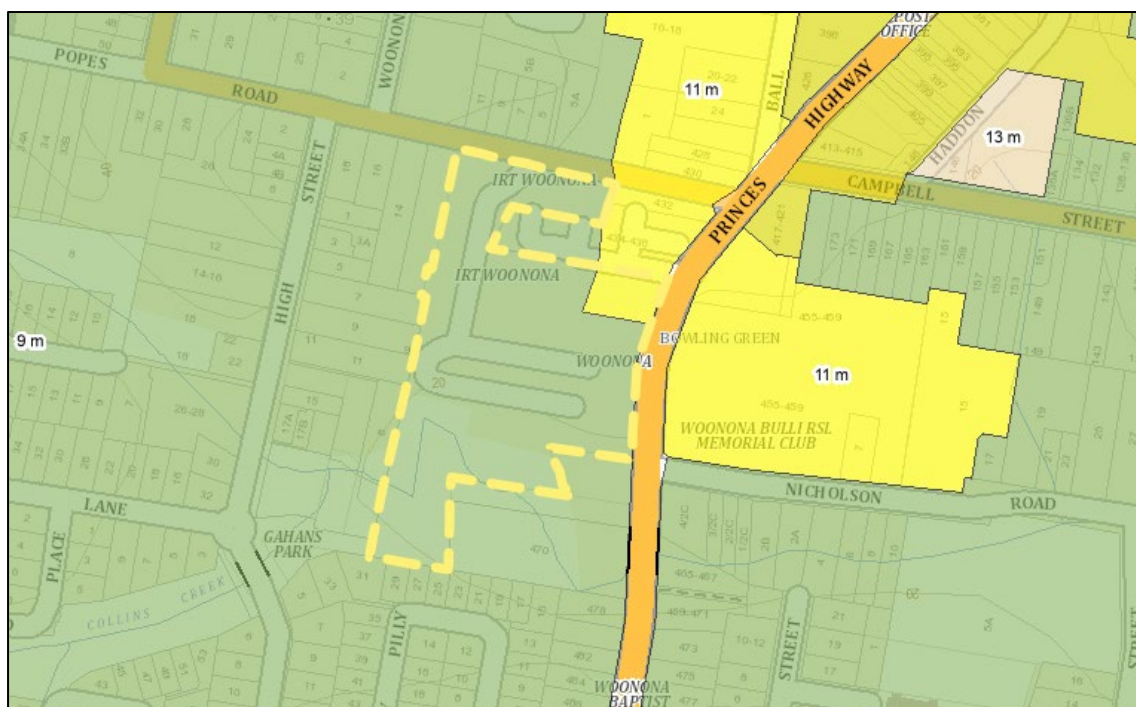


IMAGE 44 – HEIGHT OF BUILDINGS (SOURCE: NSW PLANNING SPATIAL VIEWER)

Floor Space Ratio (Clause 4.4)

The size of the site is 29,050 square metres. The Wollongong LEP 2009 maps an FSR of 0.5:1 (Image 41). The development includes independent living units and a residential care facility, therefore under Subsection 87(2) of the Housing SEPP 2021, an additional 25% of the maximum permitted FSR (0.5:1) is permitted. The allowable FSR for development on the site is 0.625:1 with the bonus 25% included. Under Section 107 (2)(c), Chapter 3, Part 5 of the Housing SEPP 2021, a non-discretionary standard of 1:1 applies.

TABLE 10 – FSR CALCULATION

Land Zone	Permitted LEP FSR	SEPP FSR	Site Area	GFA permitted	GFA proposed	Proposed FSR
ILUs & RCFs on same site	0.5:1	0.625:1 with 25% bonus applied	23,718m ²	14,824m ²	14,344m ²	0.58:1
RCFs	0.5:1	1:1 Non-discretionary standard	5332m ²	5332m ²	5332m ²	1:1

As detailed in the architectural plans in Appendix K and the calculation in Table 10, the development proposes an FSR of 1:1 (5332m² GFA) for the RCF under the non-discretionary standards in Section 107(2)(c) and 0.58:1 for the remaining site area (13,684m²), which complies with additional bonus height permitted under Section 87(2)(b) in the housing SEPP 2021.

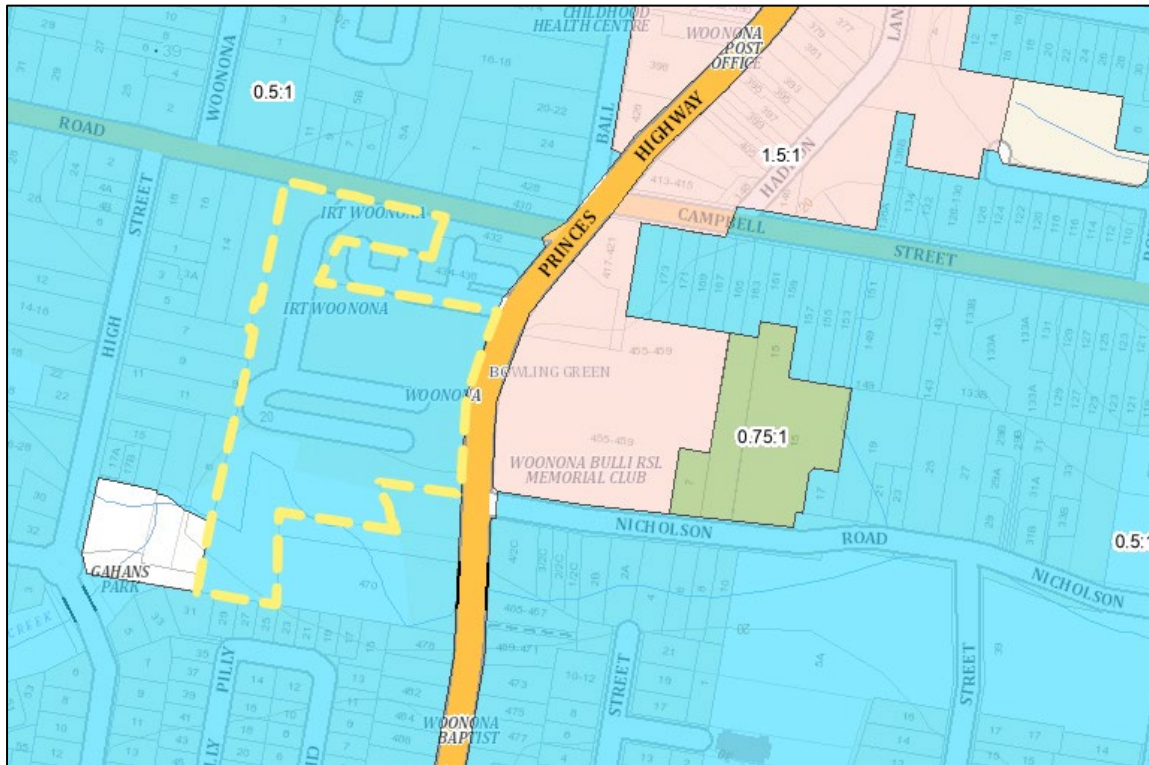


IMAGE 45 – FLOOR SPACE RATIO (SOURCE: NSW PLANNING SPATIAL VIEWER)

Exceptions to Development Standards (Clause 4.6)

As detailed in relation to Clause 4.3, the proposed development includes a breach to the permitted building height. A variation statement under Clause 4.6 to Subsection 87(2) of the Housing SEPP 2021 included as Appendix B.

Heritage conservation (Clause 5.10)

The objective of this clause is to:

- (a) to conserve the environmental heritage of Wollongong,
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,
- (c) to conserve archaeological sites,
- (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.

Clause 5.10 (2) identifies what development requires consent including the following relevant to this proposal:

- b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,
- c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
- ...
- (e) erecting a building on land:
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance

Clause 5.10(4) requires the consent authority to consider the effect of the proposed development on the heritage significance of the item concerned.

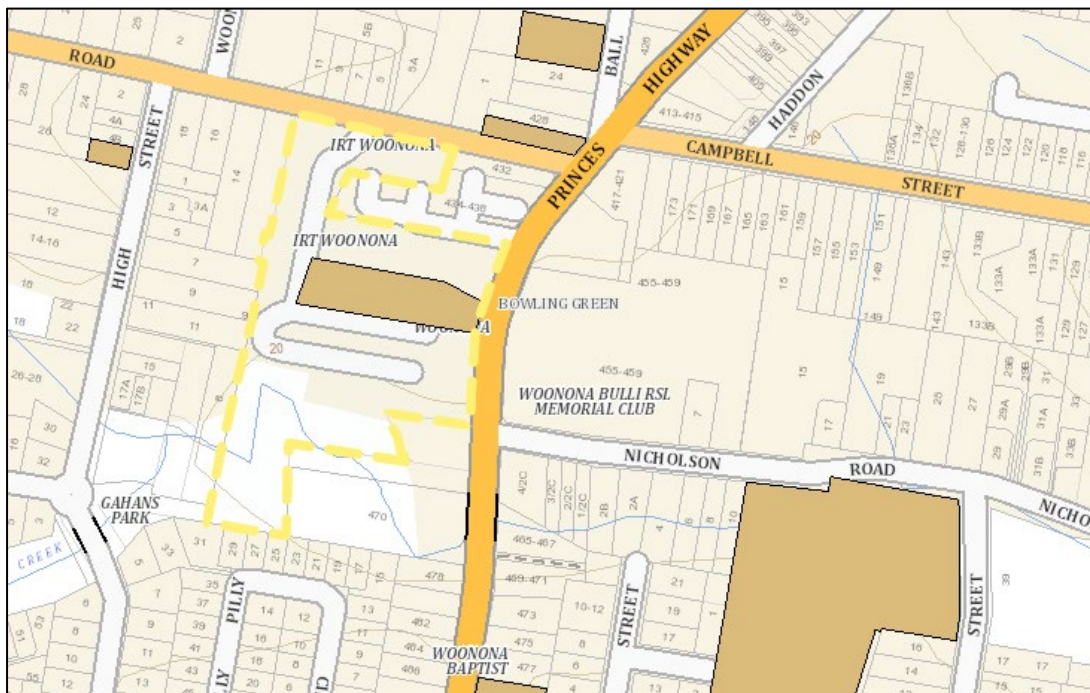


IMAGE 46 – HERITAGE CONSERVATION (SOURCE: NSW PLANNING SPATIAL VIEWER)

The site contains a heritage item ('Former Woonona Uniting Church') and lies within the vicinity of other heritage items listed by Schedule 5 Part 1 of the LEP 2009.

The heritage item on the site will be retained. For this purpose, a Statement of Heritage Impact has been prepared for the proposal by Wier Phillips Heritage required Planning Secretary's Environmental Assessment Requirements (SEARs).

The site originally formed the grounds of the Woonona Methodist Church, which was constructed c. 1909. Later additions included a school hall (1923), church hall (1930) and a timber manse (1963). These structures can be seen below in a c. 1965 aerial

photograph (image 43). When the site was gazetted as a local heritage item under the Wollongong LEP 1990, it was given a lot boundary curtilage defined as the original boundaries, as outlined in red. This curtilage was retained when the site was purchased by the Illawarra Retirement Trust in 1999 and the lots consolidated (image 44). Sometime after 2005, both manse and school hall were demolished and the existing Flametree Residential Care Facility building constructed within the heritage curtilage.

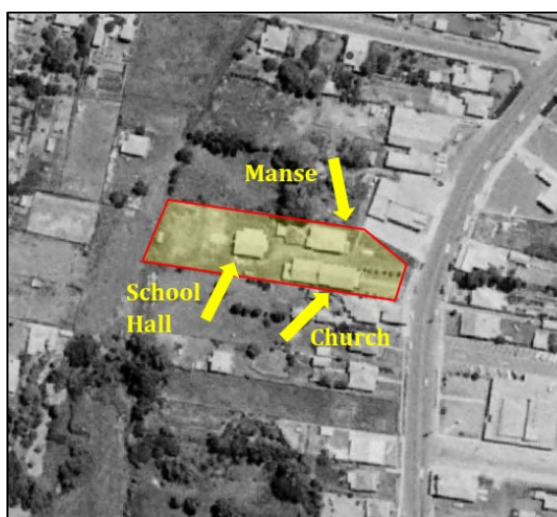


IMAGE 47 – 1965 AERIAL PHOTOGRAPH OVER WOONONA. THE SITE BOUNDARIES ARE OUTLINED IN RED. (SOURCE: NSW HISTORICAL IMAGERY)



IMAGE 48 – AERIAL PHOTOGRAPH OVER THE SITE. THE WHOLE OF THE SITE IS OUTLINED IN GREEN, WHILE THE HERITAGE OVERLAY IS OUTLINED IN RED AND SHADED LIGHT BROWN. (SOURCE: MECONE MOSAIC)

The State Heritage Inventory provides the following Statement of Significance for the 'Former Woonona Uniting Church', otherwise known as 'Blue Gum Sanctuary':

Woonona Uniting Church is of significance for the local area for historical and aesthetic reasons, for social significance that it has for its congregation, and as representative of Interwar period church buildings. The building is an important element in the streetscape of Woonona providing a visual link in the historical development pattern of the village. It is demonstrative of the evolving history of the Methodist/Uniting Church congregation. Being the third building of the congregation (the earlier two have been lost) it indicates the growth and development of the congregation. As an active place of public worship, this location continues to be a substantial part of village life in Woonona over the last 90 years. The building makes an important contribution to the streetscape and the site presents a local landmark.

There are five heritage items listed by Schedule 5 Part 1 of the *Wollongong LEP 2009* within the vicinity of the site:

- 'Woonona Industrial Co- Operative Society', Nos. 20-22 Ball Street, Woonona - This item is located to the north of the site and is separated



from it by a distance of at least 75m. The setting of the item includes single-storey 20th century period buildings and two and three-storey infill. The principal view corridor towards the item is from directly outside on Ball Street. There are no existing views at ground level between the item and the subject site.

- 'Woonona post office', No. 430 Princes Highway, Woonona – This item is located to the north of the site and is separated from it by a distance of at least 20m. The setting of the item includes single-storey 20th century period buildings and two and three-storey infill. The principal view corridor towards the item is from directly outside on either Princes Highway or Popes Road. There are existing limited views at ground level between the item and the subject site.
- 'Woonona Public School', No. 5A Gray Street, Woonona – This item is located to the east of the site and is separated from it by a distance of at least 185m. The setting of the item includes single-storey 20th century period dwellings. The principal view corridor towards the item is from directly outside on Gray Street, with secondary view corridors on Nicholson Road and Liddle Street. There are existing limited views at ground level between the item and subject site, however, the focus of the item comprising a group of school buildings has no visibility from the site.
- 'Woonona Bulli School of Arts', No. 479 Princes Highway, Woonona – This item is located to the southeast of the site and is separated from it by a distance of at least 130m. The principal view corridor towards the item is from directly outside on Princes Highway. There are no existing views at ground level between the item and the subject site.
- 'Pendlebury Rest Park', Corner Princes Highway and Gray Street, Woonona – This item is located to the southeast of the site and is separated from it by a distance of at least 200m. The setting of the item includes single-storey 20th century period dwellings and two-storey contemporary development. The principal view corridor towards the item is from directly outside on either Princes Highway or Gray Street. There are no existing views at ground level between the item and the subject site.

The proposed adaptive re-use will help to conserve the heritage significance of the 'Former Woonona Uniting Church' by giving it a viable use that will raise the necessary funds for its long-term maintenance and is consistent with heritage conservation objectives in Clause 5.10 of WLEP 2009. The proposed restaurant use requires minor alterations that are confined to areas that have already undergone change or are not readily visible. The fit-out will be minimally fixed into stud walls and will be easily reversible. Significant fabric including tiled floors and timber lined ceilings will be



retained. The new kiosk and pavilion will present as visually subordinate in scale and materiality to the retained heritage item.

The proposed redevelopment of the site for seniors housing has been carefully designed to minimise the impact on the 'Former Woonona Uniting Church'. This is demonstrated through the sensitive siting of new buildings outside of significant view corridors towards the redundant church building. The buildings are well-designed and will read with a clearly contemporary aesthetic that sits comfortably in the setting of the item.

The buildings will be constructed of high-quality materials that will help to break up the massing, while new landscaping will help to soften the interface between the buildings and the item. The proposed works will, overall, have an acceptable impact on the ability of the public to understand and appreciate the heritage significance of the 'Former Woonona Uniting Church' as a Federation period redundant church building.

Conservation of the item will be facilitated by the granting of consent. Without the proposed change of use to restaurant/café/kiosk, the church will remain as general staff areas which will not open the heritage item for use by residents and visitors on a regular basis. The church is seen as focal item in the proposed redevelopment and an active use is fitting for a church which was previously enjoyed by others in the community.

Conservation actions are included in the Statement of Heritage Impact prepared by Weir Phillips (Appendix CC) including the following:

- The proposal retains the heritage item with the new works carefully and sympathetically designed to have minimal impact on the significant fabric. The proposal is a viable use that will conserve the heritage item by raising the necessary funds.
- The historic use of the heritage item has long since been superseded. The proposed restaurant use will help to conserve the significance of the heritage item by providing the necessary funds for long-term maintenance.
- Both the kiosk and pavilion will be contemporary structures that read as clearly visually subordinate to the retained heritage item as they lie below the gutter line and are recessed well behind the front building line.
- The kiosk and pavilion will be constructed of high-quality materials including cladding to ensure they read as recessive to the heavy masonry of the heritage item.
- The pavilion will be connected to the southern elevation via a low-lying linking element that will provide clear separation between the addition and the retained heritage item.
- The reconfiguration of the internal layout is mainly confined to the rear, where it has already been altered.



- Significant fabric including the timber-lined ceiling and decorative floor tiling will be retained. The large internal volume of the redundant church hall will be retained.
- The proposed joinery, including banquette seating, will be fixed to stud walls and can be easily removed.
- New services will utilise existing connections where possible or will follow the most direct path. Masonry walls will not be chased into.
- The proposal includes a program of new landscaping, which will improve the amenity and setting of the retained heritage item. New vegetation will comprise low-lying plantings which will not impact on the structural integrity of the item.

The development will not have significant adverse effect on the amenity of the surrounding area and will have a positive impact on the area by providing a meeting place for residents and the community.

The proposal is compatible with the relevant heritage controls and adequately addresses environmental impacts and mitigation measures as required by SEARS Item 20.

An Aboriginal Cultural Heritage Assessment (ACHA) was undertaken to assess the archaeological potential for Aboriginal material as part of a State Significant Development being prepared under Part 5 of the *Environmental Planning and Assessment Act 1979*, before the proposed residential development 4-6 Popes Road, Woonona. The ACHA has been undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a), the *Guide to Investigating, assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011) and the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010b) [Consultation Requirements].

The background research found the study area has low archaeological potential due to significant ground disturbance caused by the construction of buildings, amenities, roads and landscaping within the highly developed urban areas of the site. Most landforms within the study area have undergone previous constructions and earthworks, besides a small southern portion of undeveloped land. A search of the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) database was conducted on 31 October 2023 by Austral Archaeology (Client service ID: 835004). The results from the AHIMS search identified 79 previously recorded sites and 2 Aboriginal Places within a 5-kilometre radius of the study area. None of these registered sites are located within the study area. The two Aboriginal Places within the search Radius are Bellambi Point and Sandon Point, both of which are not within or directly near the study area.



During the site inspection a culturally modified scar tree, outside of the scope of the works was recorded in the study area (AHIMS #52-2-4988). This scarred tree was registered as an Aboriginal site as per the request of the Representative Aboriginal Parties (RAPs) present during the investigations. The findings suggest it is unlikely there are further culturally modified trees, grinding grooves, rock shelters or art sites in the study area, due to the lack of suitable rock outcrops. It is recommended any future works should avoid the culturally modified scarred tree and the areas of moderate archaeological potential in the south of the study area. Archaeological research in the form of an ACHA with archaeological test excavation and consultation with the Aboriginal community is recommended if these areas are to be impacted. The proposed works are to occur only in areas in which buildings have already been developed. Multiple buildings are to be demolished under a previously accepted Development Application (DA). The development includes the construction of 85 to 95 independent living units, as well as a basement level, social and wellness centre, and a clubhouse. Other buildings within the study area will be retained and refurbished.

Flood planning (Clause 5.21)

The subject site is identified as being affected by flooding. There are two key flow paths traversing the site including:

- Collins Creek, a perennial 3rd order (Strahler) urban watercourse, traverses the southern portion of the study area. The watercourse length within the study area is approximately 200 metres, flowing west to east towards the south-east corner of the study area. The channel is well defined for large portions of the reach length, with an existing creek bed and steep banks (particularly the northern bank).
- Stormwater line, map
- ped by Wollongong City Council, is situated in the northern section of the study area and is approximately 70 metres in length. Three stormwater outlets were recorded within the channel. The stormwater line flows from west to east.

It is noted that the stormwater line in the north has not been mapped on the Hydro Line Spatial Data Map (DPIE, 2018) and is therefore not defined as a riparian corridor.

Catchment Simulation Solutions were engaged by ACOR Consultants to undertake flood model simulations for existing and proposed development conditions at the site. To mitigate the loss of flood storage due to proposed Building E, excavation of the open stormwater line in the northern portion of the site is proposed to reinstate the flood storage volume. A spillway at the downstream end of the open stormwater line and overland flow diversion channel on the northern side of proposed Building E is proposed. These flood mitigation measures are demonstrated in flood model simulations to successfully manage overland flow through the site such that changes to flood levels are nominal and no actionable nuisance is caused.



Proposed buildings are demonstrated to provide floor levels that meet the required Flood Planning Levels, providing 0.5 m freeboard above the Probable Maximum Flood level. The proposed development does not involve changes within the floodplain of the Collins Creek flow path in the southern portion of the site. Results of the flood impact assessment demonstrate no material change or actionable nuisance to flood characteristics in the Collins Creek flow path for the range of simulated flood events.

In consultation with the flood management and flood design controls implemented throughout the development, a civil engineering strategy for the site has been developed which provides a best fit solution within the constraints of the existing landform, structures and pavements, and the proposed architectural layout. A Stormwater Concept design has been prepared by ACOR in accordance with WDCP 2009 Chapter E13 and Chapter E14 (attached to the application).

Further to this, WSUD measures will be incorporated into the stormwater management plan for the site is prepared by ACOR. A stormwater treatment train and MUSIC modelling has been undertaken which involves the capture of stormwater run-off from hard surfaces such as roads, paving and roof areas within the site, and the filtration of this water through water quality initiatives such as rain gardens, swales and rainwater tanks, prior to discharge into the Collins creek outlet to the south.

A Flood Emergency Response Plan (FERP) has been prepared by Water Technology for the proposed redevelopment and details the most appropriate flood emergency management strategy for the site utilising data from site specific modelling undertaken by Catchment Simulation Solutions (2025).

This report was prepared with reference to the following flood data:

- Site-specific flood modelling prepared by Catchment Simulation Solutions (2025)
- Collins Creek Flood Study (Catchment Simulation Solutions, 2019).

The FERP recognises that protection of life is of critical and primary importance. Consistent with any emergency protocol, the protection of all lives is the priority, the comfort of residents, staff and visitors is second, and protection of site property is third.

There are 2 main types of responses to a flood emergency. These are to either:

- Evacuate off-site away from the building/s to an area above the reach of floodwaters in the PMF. This is the NSWSES preferred response, provided that the risks of evacuating are deemed acceptable; or
- Take Shelter in Place (SIP), which is to evacuate vertically within the site to higher floor levels and wait until floodwaters have receded and the emergency has passed. SIP may be considered an alternative to evacuation only when the



risks of evacuating are higher than the risks of SIP. SIP requires suitable access to a suitable shelter above the PMF level. The shelter must be protected from the weather, be structurally stable in a PMF and have sufficient floor area for all people likely to be on site at any one time. Additional requirements to increase the comfort of the people taking shelter may be needed depending on the specific circumstances.

Given that the site can be isolated by floodwaters within 15 minutes of the start of rainfall with no warning, the primary flood emergency response strategy is for site occupants to take shelter in either their home/room if floodwaters are observed on the site's driveway or across the Princes Hwy next to the site. ILU residents other than Camelia Lodge residents would also be able to shelter in the Wellness Centre.

The first step to developing a flood emergency response strategy is to assess whether a safe evacuation of the site can be obtained under all circumstances. Namely, evacuation to a location outside the floodplain must be possible in the worst-case scenario of a flood rising as fast as the PMF, when the site is at full capacity. If evacuation is possible in the worst-case scenario, it is possible in all scenarios. This is the reason why the PMF is adopted as the industry-standard event when considering risk to life and flood emergency response.

For occupants of the proposed retirement village to evacuate off site by vehicle they would need to use the site's only driveway which connects directly to Popes Road. There is likely to be less than 15 minutes of lead warning time before the driveway becomes flooded and less than 25 minutes before surrounding local roads are cut, resulting in site isolation.

It is important to note that during a PMF event floodwaters would isolate this section of Woonona and site occupants would not be able to access any appropriate off-site flood-free evacuation destination with capacity for the site occupants.

Shelter in Place (SIP) is a flood emergency response strategy that may be adopted when there is an appropriate refuge on site above the PMF level. The NSW Department of Planning, Housing and Infrastructure (DPHI) has released a shelter-in-place guideline (2025), which suggests that SIP can be the most appropriate flood emergency response strategy when off-site evacuation cannot be achieved and where flooding can occur with little notice. The FERP prepared by Water Technology has assessed the proposed development against the SIP guidelines adopted guidelines.

The guideline recommends that SIP can be used for redevelopment where flooding can start within 6 hours of the commencement of rainfall and the duration of flood inundation is less than 12 hours from the commencement of rainfall. The main site can be isolated within 15 minutes and the existing Camelia Lodge can also be isolated within 25 minutes of the commencement of rainfall in a fast-rising event and the site could be isolated for up to approximately 2 hours from the commencement of



rainfall in a 90-minute duration PMF, which is consistent with the guideline. In addition, the evacuation capability assessment in sections 4.2.1 and 4.2.2 of the FERF indicates that evacuation off-site is not achievable. Therefore, sheltering in place may be considered an appropriate flood emergency response strategy for the proposed redevelopment.

The FERF includes further details regarding Emergency Response Trigger and Actions as well as a checklist for use before, during and after an actual flood emergency.

Public Utility Infrastructure (Clause 7.1)

The objective of this Clause is to ensure that sufficient infrastructure is available to service development. The site is situated within an existing residential area and accordingly, the development will be connected to the existing public utility infrastructure available (i.e., power, water, gas, telecommunications, and the like). It is understood there is sufficient capacity to accommodate the needs of the proposal subject to appropriate augmentation works.

Natural resource sensitivity – biodiversity (Clause 7.2)

This objective of this clause is to protect, maintain or improve the diversity and condition of the native vegetation and habitat. Biodiversity is indicated throughout the eastern boundary of the site. The proposed development will not result in the removal of any native vegetation within the riparian land.

The Biodiversity Development Assessment Report (BDAR) has been prepared by Ecoplanning (Appendix I) in accordance with Biodiversity Assessment Methodology (2020) to assess the impacts to biodiversity values, including vegetation communities and species habitats, associated with the proposed development application for the redevelopment of the existing seniors housing.

The BDAR has identified the landscape context of the subject land and a 1,500 m buffer around the subject land, in accordance with the BAM. The native vegetation within the subject land has been assessed resulting in the identification of one PCT in two condition classes. The vegetation condition of this PCT has been mapped into vegetation zones, and vegetation integrity scores have been assigned to each of these vegetation zones.

Impacts have been avoided and minimised, though the proposal would result in some unavoidable impacts to biodiversity. The proposal will remove 0.03 ha of PCT 3153 in a 'Moderate' condition (see Image 25). The biodiversity offset requirement for residual impacts of the proposed development has been calculated and presented in accordance with Section 10 of the BAM. The Credit Payment Report generated from the BAM Calculator is included in this report. A total of one ecosystem credit and one species credit is required to offset the proposed impacts.



The proposed works can be satisfied relative to Clause 7.2 of the LEP.

Riparian lands (Clause 7.4)

The objective of this clause is to ensure that development does not adversely impact upon riparian lands. The proposed development area occurs adjacent to riparian land as outlined within the Wollongong LEP. The impact of the proposed development on the land must be considered, including any opportunities for rehabilitation of aquatic and riparian vegetation and habitat on that land.

The proposal involves development within the riparian corridor of Collins Creek (3rd order stream). Under the Water Management Act 2000 (VM Act), the development will trigger the need for a Controlled Activity Approval for works proposed on “waterfront land”.

The Natural Resources Access Regulator (NRAR) guidelines (NRAR 2022) require a Vegetated Riparian Zone (VRZ) either side of mapped watercourses. The width of the VRZ is predetermined and standardised for watercourses based on the Strahler order. Given Collins Creek is a 3rd order stream, a 30 m buffer is required on either side of the channel. Open lawn areas, on-site detention basins with plantings, pickleball courts, BBQ area and a community garden are proposed within the outer 50% of the riparian corridor.

The NRAR guideline provides an averaging rule, allowing encroachment into the outer 50% of the VRZ, so long as the average width of the VRZ may be used for non-riparian uses, including asset protection zones, recreational areas, roads, development lots and infrastructure. However, an equivalent area connected to the riparian corridor must be added to the VRZ, and the inner 50% of the VRZ must be fully protected and vegetated with native endemic riparian plant species (NRAR 2022).

The VRZ and prescribed management has been addressed in the BDAR and the Landscape Design Report (Arcadia 2025).

The consent authority can be satisfied with regard to the provisions of Clause 7.4 of the LEP.

Earthworks (Clause 7.6)

The objectives of this clause are to ensure that any earthworks will not have a detrimental impact on environmental functions and processes, neighbouring uses or heritage items and features surrounding land.

The development proposes earthworks associated with the provision of foundations, basement construction and associated infrastructure, which can be undertaken using standard engineering practices.



The consent authority can be satisfied that all relevant matters have been addressed in the assessments undertaken and mitigation measures can be conditioned.

Wollongong Development Control Plan 2009

It is noted that development control plans are not a matter for consideration in the assessment of SSDAs by virtue of Clause 2.10 of the Planning Systems SEPP, which states that:

(1) Development control plans (whether made before or after the commencement of this Chapter) do not apply to—

(a) State significant development, or

(b) development for which a relevant council is the consent authority under section 4.37 of the Act.

As the proposal is for the purposes of seniors housing and is SSD, the Wollongong DCP provisions have not been addressed, however the development has been designed consistent with the general development controls in Wollongong DCP 2009 where relevant including flooding, stormwater management and building setbacks in conjunction with ADG requirements.

Stakeholder Engagement

IRT brought AMC Architecture on board to assist in the initial master planning of the site and the proposed development in early 2023 (Image 45). This important early work helped to establish design and development parameters for the site and to enable early consultation with Council and other external agencies.

Consultation with Council

Council was formally consulted in relation to the initial master planning work in August 2023. Key urban design issues raised by the Council included:

- A Desire to manage streetscape heights to achieve compatibility with the Woonona township
- Key heritage visual relationships between the Woonona township, the former church on the site and the distant views to the escarpment beyond
- Advice that access via Princes Highway would not be supported
- Manage riparian and flooding issues
- Manage interfaces to the adjacent dwellings in the R2 zone.

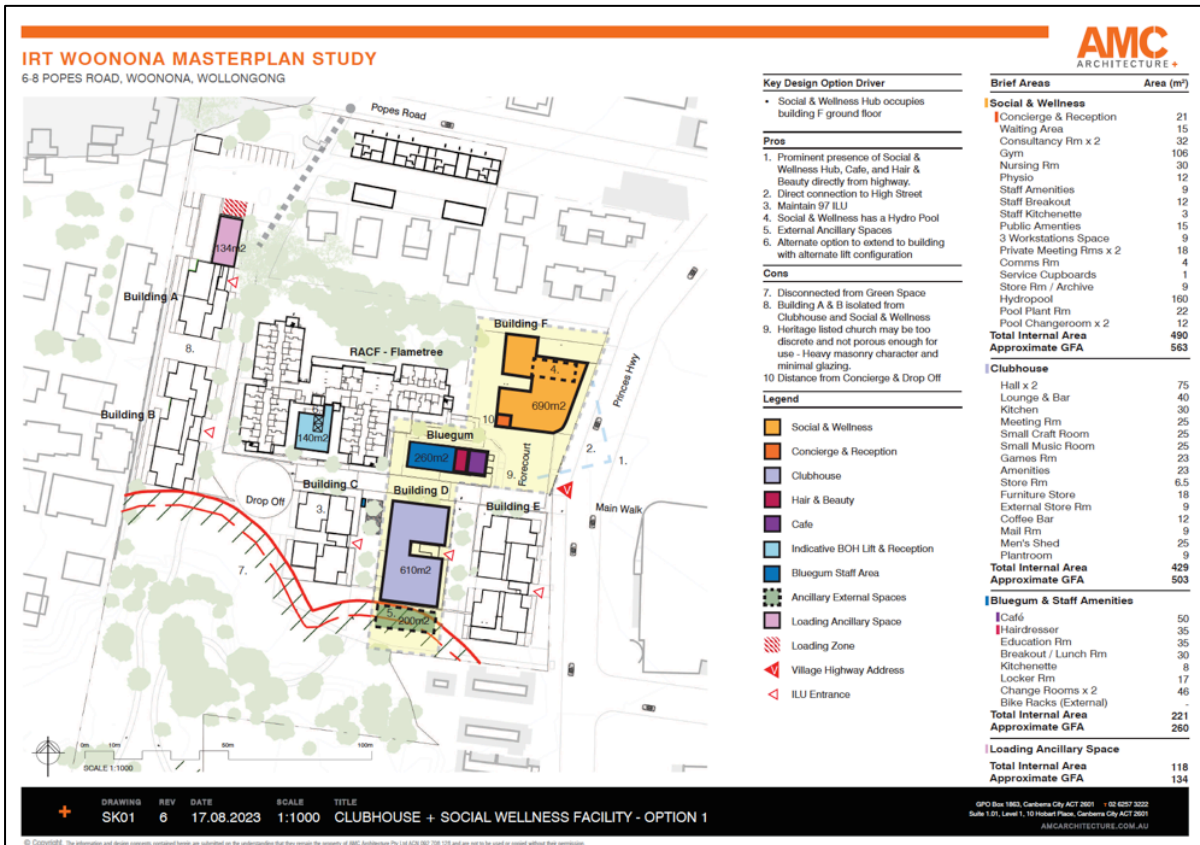


IMAGE 49 – AMC MASTERPLAN AUGUST 2023

Urban Design

Urbanac was brought into the project team in late 2023 to further refine the urban design aspects of the design, to help in the design selection process and to advise on urban design matters as the design was developed.

Competitive Design Selection

As part of its tendering process, IRT selected its architectural consultant based on a competitive design selection process. Three architectural firms were asked to present a design conceptual approach for the proposal as part of the tender response. The three firms were:

- AMC Architecture
- Gardner Wetherill and Associates (GW)
- Edmiston Jones Pty Ltd

Presentations by tendering architects took place by video between 1 and 16 November 2023.

Edmiston Jones was selected to undertake the remainder of the architectural design for the proposal based on their design conceptual approach. Further detailed design undertaken by Edmiston Jones (Images 45 and 46) and presented to the State Design Review Panel (SDRP). Calderflower Architects were engaged to prepare the architectural plans for the amendments to the Residential Care Facility given their specific expertise in seniors housing projects and were appointed as the project Architects for the whole site to finalise the architectural concept and detailed design.

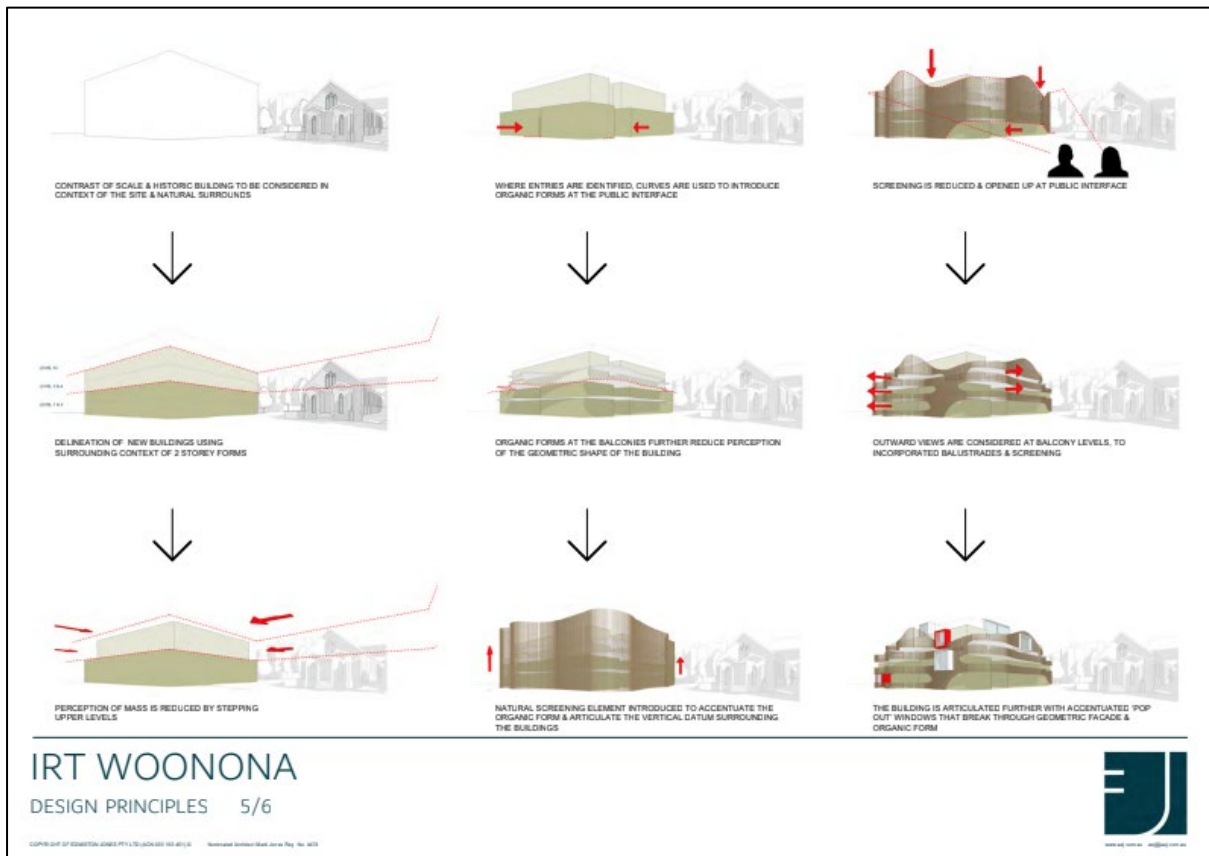


IMAGE 50 – EDMISTON JONES DESIGN PRINCIPLES AND APPROACH DRAWINGS



IMAGE 51 – EDMISTON JONES DESIGN PRINCIPLES AND APPROACH DRAWINGS



Council Design Review Panel

IRT, MMJ Planning, Edmiston Jones and Urbanac presented an updated pre-lodgement design to the Wollongong Design Review Panel in January 2024.

Key issues raised by the DRP include, but not limited to:

- Support for the central pedestrian spine
- Support for a forecourt for the former church
- Support for the extended riparian zone to Collins Creek and opportunities to allow occupants to interact and view this high-quality landscape
- A recommendation to undertake a view analysis given the issues around heritage visual relationships between the Woonona township and the site's heritage item (this work was subsequently completed in early 2024 and will form part of the SSD DA)
- Further design work to develop a variety of high-quality communal spaces in and around buildings to supplement the more formal linear spaces
- Manage potential flooding issues for the site
- Consider opportunities to link to and connect to public open space of Gahans Park at the south of the site.

Brooks Community Engagement

BROOKS Community Engagement (BROOKS) has been engaged by IRT Group to provide comprehensive community engagement services for the proposal and to provide a Community Engagement Report.

Impacts of construction, and the overall public perception of the development, are the key focus areas for the proposal. As such, engagement will align with IAP2 best practices by utilising the Spectrum of Engagement to effectively inform and consult the community throughout the course of the development.

The strategy prioritises transparency by sharing information, actively listening to the community, delivering clear communication, and engaging proactively with the Woonona community. The goal is to keep the community well-informed throughout the development process and ensure awareness of the social and wellness centre that will be provided to the broader community.

BROOKS aims to effectively connect with both neighbouring residents and the wider Woonona community in the project. This will be achieved with the following engagement methods: strategic communications, one on one consultations, creation and distribution of a community information letter, hosting community Drop-In Information Sessions, and providing a platform for open dialogue between the engagement team and the community.

The facilitators will work closely with the community through face to face engagement. BROOKS will create opportunities for stakeholders to provide their



feedback, seek out information, and proactively address and rectify any misconceptions surrounding the redevelopment of the Seniors Living Community. With regular, accurate, and transparent communication, BROOKS will play an important role in building and maintaining the community's trust for the project.

External Agency Consultation

Agency and Council consultation was undertaken to seek feedback from relevant agencies prior to the lodgement of the SSDA.

This section describes consultation undertaken and feedback received prior to the lodgement of the EIS for the proposal, and engagement to be carried out following lodgement of the EIS.

A number of stakeholders were identified for consultation, including:

- Department of Planning, Housing and Infrastructure (DPHI) – State Assessment Team
- Transport NSW
- Sydney Water - Growth and Development, Water and Environment Services
- NSW DCCEEW - Biodiversity
- NSW SES
- Local Aboriginal Land Council(s).
- DCCEEW - Water Group
- Endeavour Energy
- Heritage NSW
- Illawarra Local Aboriginal Land Council

Responses were not received from Heritage NSW, Local Aboriginal Land Councils or Illawarra Local Aboriginal Land Council. It is noted that the Local Aboriginal Land Councils were consulted during the consultation phases of the Aboriginal Cultural Heritage Assessment Report.

This approach follows the Undertaking Engagement Guidelines for State Significant Projects (2021) by:

- Engaging with relevant NSW Government agencies, service providers, Council, surrounding neighbours and community groups who are most likely impacted or interested in the proposal;
- Informing the surrounding community to the site about the proposal and providing opportunities to provide feedback;
- Explaining how community feedback will be considered and documented;
- Providing relevant information in plain English so that potential impacts and implications can be readily understood; and
- Providing channels of communication to gather feedback.

The submitted SSDA package includes various changes made in response to the feedback received during the consultation process from agencies, Council,



Wollongong Design Review Panel, State Design Review Panel and the community engagement undertaken by Brookes.

A summary of the agency feedback received is outlined below in Table 12.

TABLE 11 – SUMMARY OF AGENCY CONSULTATION AND FEEDBACK

Agency	Summary of consultation	Response
Department of Planning, Housing and Infrastructure (DPHI) – State Assessment Team	<p>Stephen Dobbs requested brief summary of any changes from the 2nd DRP.</p> <ul style="list-style-type: none"> • Consider providing more detail on the shadow impact to the private open space of 460 Princes Highway if the project would reduce its access to solar to less than 3 hours on June 21. This could include alternative time periods. • Include any proposed front boundary fencing in visualisations • We encourage continued community engagement • Please try to include a discussion on any displaced residents as part of the social impact assessment 	<p>Additional changes have been made to the Architects Design Report to clarify the changes made.</p> <p>Additional shadow analysis showing impacts on 460 Princes Highway has been provided.</p> <p>No front fencing is proposed.</p> <p>Community consultation has occurred through Brookes Community Engagement and will continue throughout the process.</p> <p>Impacts related to the resident displacement have been assessed as Low. Eight (8) current residential aged care residents are required to move, however they have been relocated within the site.</p>
Transport NSW	<p>In order for TfNSW to assess the proposal, TfNSW would require the Transport and Accessibility Impact Assessment to consider:</p> <ul style="list-style-type: none"> • Traffic generated by the development and its impact, if any, to the state road network and its connections. • Any impacts identified should include appropriate mitigations. <p>The study should also consider:</p> <ul style="list-style-type: none"> • Traffic generated by the development and its impact, if any, to the local road network along with identified mitigations. • Pedestrian connectivity to existing pedestrian and shared user paths. • Accessibility to public transport. • Internal car parking arrangements for residents, staff and visitors. 	<p>The Traffic Impact Assessment assesses the traffic generated by the development and its impact to both the state and local network, mitigation measures for impacts identified, pedestrian connectivity to existing pedestrian and shared user paths, accessibility to public transport, and internal car parking arrangements for residents, staff and visitors.</p>
Sydney Water - Growth and Development, Water and	<p>Recommend that you lodge a feasibility application through a Water Servicing Coordinator, to receive advice on our current capacity to service</p>	<p>We note the recommendation to lodge a feasibility application through a Water Servicing</p>



Environment Services	your proposed development, and any potential servicing requirements.	<p>Coordinator; however, this was not undertaken as part of the current application, given the site's urban context and ability to connect to existing infrastructure.</p> <p>The application will be made at a later date.</p>
NSW SES	<p>In summary, we:</p> <ul style="list-style-type: none"> • Note that the proposal is for redevelopment of an <i>existing</i> seniors housing and residential care facility complex, which is impacted by flooding as frequently as 20% AEP events. • Recommend that the Environmental Assessment includes a comprehensive Flood Impact and Risk Assessment, to be prepared in accordance with the Flood Risk Management Guideline LU01, and include: <ul style="list-style-type: none"> ○ consideration of the full range of flooding events, up to and including the Probable Maximum Flood (PMF) event; ○ flood risk from at the site and access/egress roads (including internal roads and the broader road network) and any risk of isolation; the impact of flooding on the roadways should go beyond immediately adjacent to the site to fully understand the isolation risks and any evacuation constraints. We emphasise that evacuation must not require people to drive or walk through flood water. ○ impacts of the development on flood behaviour at the site, neighbouring and downstream properties (pre- and post-development conditions); ○ time to onset, duration of inundation, depth, velocity and hydraulic hazard of any flooding; ○ climate change impacts should also be considered, in line with NSW Government guidelines. • Recommend considering site design that avoids placing residents at risk of flooding or isolation, particularly as the site is considered for sensitive uses. Hospitals, nursing homes and aged care facilities (inter alia) should be situated above the 	<p>A Flood Assessment and Flood Emergency Response Plan (FERP) have been prepared in accordance with the Flood Risk Management Guideline LU01. This assessment has:</p> <p>Considered the full range of flooding events, up to and including the Probable Maximum Flood (PMF);</p> <p>Assessed flood risk at the site and along access/egress routes, including internal roads and connections to the broader network, with specific consideration of isolation risks and evacuation constraints;</p> <p>Evaluated the development's impact on flood behaviour at the site, adjacent, and downstream properties under both pre- and post-development conditions;</p> <p>Included analysis of onset time, flood duration, depth, velocity, and hydraulic hazard; and</p> <p>Incorporated climate change impacts in accordance with NSW Government guidelines.</p> <p>The project team reviewed site design options to reduce risk to future residents and ensured that sensitive uses, including residential care facilities, were sited above the PMF</p>



	<p>PMF level. Therefore, we recommend that, following a robust flood risk assessment, the location of the proposed buildings (for example A and E) are not placed at significant flood risks, and stormwater management improvements to mitigate the risk of flooding at the site will benefit the existing and future community.</p> <ul style="list-style-type: none"> • Recommend seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour at the site, downstream areas and neighbouring properties. • Recommend considering basement carpark design that provides passive protection to the Probable Maximum Flood (PMF), or reconsidering basement carparking if this is not feasible. 	<p>level where feasible. The locations of Buildings A and E were specifically reviewed in this context. Refer to FERP which includes details of the proposed Shelter in Place Strategy.</p> <p>We sought and obtained advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) regarding the impact of the proposed development on flood behaviour at the site, as well as on downstream and neighbouring areas.</p> <p>The basement carpark design was developed to provide passive protection up to the PMF level. Where full passive protection was not feasible, alternative mitigation measures were incorporated to ensure compliance and safety.</p>
<p>DCCEEW Water Group -</p>	<p>Floodplain Risk Management</p> <p>The subject site is subject to high hazard flooding in the 1% Annual Exceedance Probability (AEP) and Probable Maximum Flood (PMF) Events. High hazard flooding occurs during the 1% AEP and PMF at multiple locations on the Princes Highway on the north and south approach to the site which prevents emergency services access. The risks associated with internal and overall flood access should be assessed as part of the overall Flood Impact and Risk Assessment (FIRA) process. In addition to the project SEARs and additional assessment requirements, as per DPHI's letter dated 5/8/24, we recommend that the FIRA also addresses the following:</p> <ol style="list-style-type: none"> 1. Propose and assess the effectiveness of management measures required to minimise the impacts and risks of flooding to the development and its users and existing community. 2. Provide documented evidence of consultation with Wollongong City Council on the best available flood risk information and consistency with development 	<p>The site's exposure to high hazard flooding during the 1% AEP and PMF events, including on the north and south approaches to the Princes Highway, was acknowledged. We addressed the associated access and isolation risks through the preparation of a comprehensive Flood Assessment report (ACOR).</p> <p>As part of the FIRA process, we: Assessed and proposed flood management measures to minimise the risks to future residents, staff, and the broader community. Where placing buildings entirely outside of the flood-affected area was not possible, design and operational measures were implemented to mitigate potential impacts and ensure safety.</p> <p>Consulted with Wollongong City Council to confirm the use of the best available flood risk information and to ensure</p>



	<p>controls for seniors living development on floodplains, particularly those that address public safety risk for vulnerable populations for the full range of flood events up to and including the PMF.</p> <p>3. Provide documented evidence of consultation with NSW SES on the emergency management issues and the Flood Impact and Risk Assessment (FIRA) should reflect the outcomes of this consultation.</p> <p>Biodiversity Based on the State Vegetation Type Map release C2.0.M2.1, we note that there is native vegetation mapped within the subject land, along Collins Creek. This native vegetation is identified as two different Plant Community Types (PCT) being PCT 3153 - Illawarra Escarpment Bangalay x Blue Gum Wet Forest; and PCT 3327 - Illawarra Lowland Red Gum Grassy Forest.</p> <p>PCT 3327 is associated with Illawarra Lowlands Grassy Woodland in the Sydney Basin Bioregion, listed as an Endangered Ecological Community under schedule 2 of the <i>Biodiversity Conservation Act 2016</i> (BC Act) and identified as an entity at risk of Serious and Irreversible Impacts (SAIL).</p> <p>In addition, this native vegetation could also be habitat (roosting, foraging or breeding) for protected native animals, for example Grey-headed Flying-fox. According to the National Flying-fox monitoring viewer, there are Flying-fox camps monitored within the broader area, and this species is known to camp close to water, in vegetation with a dense canopy.</p> <p>We would like to better understand potential biodiversity impacts, in addition to the proposed landscaping and vegetation management in the riparian corridor, as currently these details are not available. The EIS should provide these details. We note that Wollongong City Council has already approved DA-2023/808 for staged demolition works including tree removal. EIS/BDAR, and particularly any BDAR waiver application, should clearly delineate which works and removal of trees/vegetation are already approved against what is proposed.</p> <p>The EIS should identify measures taken to avoid, minimise and mitigate impacts to biodiversity, in accordance with the “avoid, minimise, offset” framework of the BC Act. The EIS should also</p>	<p>alignment with relevant controls for seniors housing on flood-affected land. This included specific consideration of public safety risks for vulnerable populations across the full spectrum of flood events up to the PMF.</p> <p>Engaged with NSW SES to discuss emergency management implications. The FIRA reflects the outcomes of this consultation, including agreed assumptions around access, egress, and shelter-in-place strategies where necessary.</p> <p>The presence of native vegetation along Collins Creek, including PCT 3153 (Illawarra Escarpment Bangalay x Blue Gum Wet Forest) and PCT 3327 (Illawarra Lowland Red Gum Grassy Forest), was recognised and documented during site investigations. As noted, PCT 3327 forms part of an Endangered Ecological Community (EEC) under the Biodiversity Conservation Act 2016 and has been treated accordingly in the assessment.</p> <p>The potential habitat for native fauna, including the Grey-headed Flying-fox, was also investigated. The BDAR:</p> <ul style="list-style-type: none"> • Provided detailed assessment of biodiversity values, including species habitat, vegetation condition, and the location and status of any known fauna camps; • Included a Biodiversity Development Assessment Report (BDAR), which detailed the extent of impacts, proposed mitigation, and application of the avoid, minimise, offset
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	<p>demonstrate how the proposal will protect the environment, including the conservation of threatened and other species of native animals and plants, ecological communities and their habitats. These details may be assessed through a Biodiversity Development Assessment Report (BDAR). The proponent may wish to utilise the BDAR Template and guidance document. Alternatively, the proponent may wish to apply for a BDAR waiver.</p> <p>We note the Industry Specific SEARs has a Trees and Landscaping criteria. The EIS should include a Landscape Plan which incorporates locally indigenous species (no cultivars). For further guidance on suitable native species, see the profile for the Plant Community Type PCT 3153 – Illawarra Escarpment Bangalay x Blue Gum Wet Forest; and PCT 3327 – Illawarra Lowland Red Gum Grassy Forest; and Table 3 of Wollongong DCP 2009 – E6 Landscaping.</p>	<p>framework under the BC Act;</p> <p>The project included a Landscape Plan that incorporated locally indigenous species consistent with PCT 3153 and PCT 3327, and aligned with Table 3 of the Wollongong DCP 2009 – E6 Landscaping.</p>
Endeavour Energy	Advice given was general in nature. No items require a response at this stage.	
Heritage NSW	No response received.	
Illawarra Local Aboriginal Land Council	No response received.	
Local Aboriginal Land Council(s).	No response received.	

Assessment of Impacts

This section of the EIS describes how the key issues identified in the SEARS has been addressed in this report.

The potential environmental impacts of the proposed seniors housing development have been thoroughly investigated through a series of specialist technical studies. This section of the Environmental Impact Statement (EIS) summarises the findings of these assessments and outlines the recommended measures to mitigate and manage any identified effects to ensure a sustainable outcome.

To support this analysis and demonstrate a comprehensive response to regulatory and community considerations, the following detailed information is appended:

- **Appendix C:** A compliance table addressing the Secretary's Environmental Assessment Requirements (SEARs).
- **Appendix O:** A report on the community engagement process and the responses to issues raised.



The specialist consultant reports and plans that form the basis of this assessment are individually referenced in the sections below that follow and are available in the appendices for detailed review.

Assessment of Key Impacts

The key issues identified may have a significant impact on the site and locality of Woonona. An assessment of those relevant issues and the mitigation measures required to avoid, mitigate and/or offset the impacts of the project are summarised below.

Design Quality and Built Form

An architectural Design Report has been prepared by Calderflower and Urban Design Report prepared by Urbanac. The Urban Design analysis of the proposed redevelopment is submitted with this development application. The report was developed in collaboration with IRT, MMJ Planning and the various project architects including GW, AEJ and Calderlower Architects. The analysis examines how the site context, character and conditions of the site were considered to determine the desired future character based on the planning controls for the proposed seniors housing development. It aims to guide good urban design outcomes for built form on the site that achieves a harmonious fit with the context.

Urbanac has provided urban design input on the project through the State Design Review Panel and development of the concept through to detailed design. A detailed analysis of the landscape design and connecting to country opportunities was undertaken by Arcadia.

Potential Impacts

The proposed development is considered to have an overall positive impact in response to design quality and built form.

- **Physical Constraints**

A thorough analysis of the existing site context and locality required detailed consideration given the site constraints such as riparian corridors, overland flow paths and flooding to provide a considered design relative to its context. A contextual response to the site constraints was required.

- **Landscape**

The site has three major landscape areas:

- Dense riparian vegetation to the south of the site associated with Collins Creek (proposed demolitions will allow for reinstatement of the riparian zone)
- Planted trees along the internal northern side boundary
- An area of landscaped space at the east of the site along the Princes Rd frontage.
- Removal and replacement of the non-indigenous fig north of the heritage



item to better open views and to provide for building envelopes.

The redevelopment of the site provides positive impacts to maintain and enhance the riparian vegetation to the south of the site and retain existing trees where possibly.

- **Heritage**

The site contains Heritage item #61007 “Former Woonona Uniting Church” located in Nos. 4-6 Popes Road, Woonona. There are also several heritage items in the vicinity:

- Heritage item #6195 “Woonona Post Office”
- Heritage item #6194 “Woonona Industrial Co-operative Society”
- Heritage item #6502 “Woonona Bulli School of Arts”
- Heritage item #6199 Pendlebury Rest Park.

Redevelopment of the site creates potential impacts to the existing views of the former church from the Princes Highway north of the site looking towards the former church with the escarpment and the riparian zone vegetation behind.

State Design Review Panel

The SEARs required considerations of the proposed development by the State Design Review Panel (SDRP). Two SDRP meetings were attended and the recommendations of the SDRP have been sufficiently addressed through this SSDA as detailed in the SDRP Response Report by Calderflower.

Mitigation Measures

The potential for an undesirable built form or urban design outcome has been effectively addressed through the design process. The key principles guiding this successful result are detailed below:

Built form, building height and scale

- The proposed development provides richly articulated forms to new buildings fronting the Princes Highway to respond to the existing scale of the streetscape, break down the scale of larger footprint buildings, and provide a suitable setting for the former church.
- Manage building design along the west of the site to respond to the existing scale of adjacent properties and the overall R2 zone.

Building setbacks

The development:

- Provides a front setback to the Princes Highway consistent with DCP minimums and as a transition to properties to the south.
- Maintains side boundary setbacks consistent with DCP and ADG minimums
- Maintains a 12m minimum width ‘setback’ zone along the view from the Princes Highway north of the site looking towards the former church heritage item with the escarpment visible above.



- Maintains a 12m setback zone south of existing buildings and the church for use as a formal hard and soft landscaped pedestrian spine.
- Minimises encroachment on the riparian vegetation zone.

Landscape

- Maintain and enhance the riparian vegetation to the south of the site.
- Maintain a landscaped area east of the heritage item connecting to a more formal hard and soft landscaped pedestrian ground plane and access.
- Ensure plantings complement heritage curtilages and views and remove the non-indigenous fig north of the heritage item to better open views and provide for new envelopes.
- Provide for individually designed communal open spaces in the spaces between new buildings in addition to the major spaces of the pedestrian spine and the heritage lawns.

Heritage

- Conserve and adaptively reuse the former church building.
- Conserve the curtilage of the former church by maintaining a landscaped open space between it and the Princes Highway.
- Maintain the view from the Princes Highway north of the site looking towards the former church heritage item with the escarpment visible above the former church and the riparian zone vegetation behind.
- Maintain the primary formal pedestrian entrance from Princes Highway adjacent to the former church.
- Consider a strong base to new buildings adjacent to the heritage item with upper levels reading as more recessive to respond to the scale of the heritage item.
- Allow for contemporary additions to the heritage item to facilitate its adaptive reuse while maximising its retention of significant fabric.

Views

- The positioning of the development north of the former church back from the street frontage preserves the view of the church from the north, with an angled setback from the Princes Highway.
- Existing views to vegetation/riparian area behind the former church have been maintained with an open space or lower rise buildings beyond the church along this view.
- The non-native fig tree north of the former church has been removed to open the view (with replacement of this tree with new tree plantings in more appropriate locations).

Streetscape

- The development provides richly articulated forms to new buildings fronting the Princes Highway to respond to the existing scale of the streetscape.



breaking down the scale of larger footprint buildings, and provide a suitable setting for the former church.

Connecting with Country

- The design seeks to bring people into the space and create spaces that connects back to land and honour other elements of Dharawal Country.
- The Landscape Architects have demonstrated the connectedness to Country, celebrated through materials, planting and landscape design moves that allows Country to exist, and us to exist with Country.
- Create landscape spaces for contemplation and reflection, and for residents to appreciate the spectacular natural environment that surrounds the site.

Crime Prevention Through Environmental Design (CPTED) Principles

- To ensure a safe and secure environment, a CPTED review has informed the project's design. The report's practical recommendations directly address potential safety concerns, effectively reducing opportunities for crime and anti-social behaviour through tangible design interventions.

Building Code of Australia (BCA) / National Construction Code (NCC) & Accessibility

A key feature of the proposed development is to provide equitable access and travel paths throughout so that all residents can easily access communal spaces and other dwellings to maximise community engagement and sense of place. A Statement of Compliance/Access Report has been prepared by Accessible Building Solutions to address compliance is required with the following:

- The Access provisions of the BCA 2022
- The Access To Premises Standard
- AS1428 suite of Standards
- AS2890.6 for car parking
- AS1735.12 for lifts
- AS4299 Adaptable Housing
- SEPP Housing 2021 Chapter 3 Part 5
- Council's DCP relating to Access for People with a Disability

The Access Report concludes that based on the basis of the assessment, the proposal can achieve compliance with the access provisions of the BCA, the Access to Premises Standard and Housing SEPP.

The BCA Compliance report confirms that the development can comply with the BCA/NCA.

Design Principles for Seniors' Housing & Apartment Design Guide

The proposed development is consistent with the design principles for Seniors' Housing and Apartment Design Guide – refer to Appendix L(1) and L(2) ADG and Senior's Design Guide conformance reports.



Flooding and Water Management

There are two key flow paths traversing the site. The following descriptions are generally as described in Biosis (2023):

- Collins Creek, a perennial 3rd (Strahler) order urban watercourse, traverses the southern portion of the study area. The watercourse length within the study area is approximately 200 metres, flowing west to east towards the south-east corner of the study area. The channel is well defined for large portions of the reach length, with an existing creek bed and steep banks (particularly the northern bank).
- Stormwater line, mapped by Wollongong LEP, is situated in the northern section of the study area and is approximately 70 metres in length. Three stormwater outlets were recorded within the channel. The stormwater line flows from west to east.

It is noted that the stormwater line in the north has not been mapped on the Hydro Line Spatial Data Map (DPIE, 2018) and is therefore not defined as a riparian corridor.

Potential Impacts

The proposed development in the southern portion of the site is described in the Flood Impact Assessment:

- Proposed Buildings B, C and D and the vehicle turning loop are to be located on the northern side of Collins Creek and set further back from Collins Creek than the existing Blueberry Ash Apartments. Proposed Buildings B, C and D will be positioned outside the extent of the outer riparian zone of Collins Creek. Proposed building structures are outside the extents of the Probable Maximum event in Collins Creek.

The proposed development in the northern portion of the site is described in the Flood Impact Assessment:

- The existing Ribbonwood Lodge building at the north-west corner of the site is to be demolished. Proposed Building A is to be located here. The northern end of Building A is located adjacent to the existing overland flow path (stormwater line) described in section 2.2. Building B is located south of Building A. Building B is proposed to have a basement with the top of the basement ramp located at the northern side corner of the building. Refer to section 4.3 for assessment of proposed floor level and basement crest level against proposed development conditions Flood Planning Levels.
- Proposed Building E is to be located at the north-east corner of the site (east of the existing Flametree building and north-east of the existing Blue Gum Sanctuary building). The position of proposed Building E is in the existing overland flow path of the stormwater line. Refer to section 4.2 for description of proposed flood mitigation measures for proposed Building E.

Mitigation Measures

- Collins Creek (southern portion of the site):**
 The proposed civil design surface at the southern portion of the site in the vicinity of Collins Creek was embedded into the TUFLOW model for proposed development conditions simulations. It is noted that the area of works (earthworks and building structures) is outside the extents of the Probable Maximum Flood event in Collins Creek.
- Stormwater line (northern portion of the site):**
 The proposed civil design surface incorporating the existing floor level of Flametree building, proposed floor level of Buildings A and B, and internal road were embedded into the TUFLOW model for proposed development conditions simulations.

The proposed site design intends to compensate for the loss of flood storage caused by proposed Building E by increasing the flood storage volume within the existing open stormwater line (described in section 2.2 of the FIA) by excavation. A retaining wall along the southern bank of the open stormwater line is required due to the excavation.

A concrete overflow spillway at the downstream (eastern) end of the open stormwater line is proposed with crest level 24.53 m AHD. An overland flow diversion channel from the spillway will be provided to convey overland flow beyond the spillway around proposed Building E to the site boundary at Princes Highway. The proposed civil design surface incorporating the proposed floor level of Building E, excavation of the existing open stormwater line, spillway and overland flow diversion channel around Building E was embedded into the TUFLOW model for proposed development conditions simulations. The figure below illustrates these proposed features (Image 48).



IMAGE 52 – PROPOSED AREA OF EXCAVATION AND SPILLWAY AT THE STORMWATER LINE AND OVERLAND FLOW DIVERSION CHANNEL AROUND BUILDING E (ACOR CONSULTANTS)



The Wollongong Development Control Plan 2009 requires that all proposed floor levels must at least be set to the Probable Maximum Flood level plus 0.5 metres freeboard.

The Flood Planning Level (FPL) is equivalent to the Probable Maximum Flood level plus 0.5 metres freeboard, which is the minimum floor level required for proposed buildings part of a residential care facility. All proposed buildings meet the requirement for minimum floor level.

Further mitigation measures to water and flood management on site are included in the Flood Emergency Response Plan, Shelter in Place Strategy and Water Management Plan, see below summary:

Document	Author	Potential Impacts and Mitigation Measures
Appendix Q - Flood Emergency Response Plan	Watertech	IRT to be responsible for: <ul style="list-style-type: none"> • A flood sensor will be located on the western side of the driveway • Wellness Centre can be accessed from all buildings via paths and internal roads above the PMF level • A number of staff and residents are to be nominated as Flood Wardens (min 2 at all times) • Flood wardens to be subscribed to BOM weather app • At least 2 flood wardens on site at all times • Flood wardens must be able to open the wellness centre for site occupants • Flood warden to have access at all times to device with 4-5g internet access and 24hr capacity • Audible PA system throughout site • Backup generator located above PMF level to wellness centre and RAC with 8hr power supply. • Recommended for dwellings as well to assist approval of SSDA • All buildings to be used for Shelter in Place to be certified by a structural engineer to withstand floodwater forces of PMF • Non-perishable food and drink stored in wellness centre and RAC, encourage residents to do the same • First Aid kit in each building • Keep contact list with primary contact details for RAC residents • Hard copy of FERP to be kept in each building



		<ul style="list-style-type: none"> • FERP is reviewed and updated every 5 years, or following a flood • As part of the sales process all new residents are made aware of flood risks • Post-flood site clean-up and recovery • Ensure there are sufficient financial, human and other resources to maintain and implement the FERP • FERP <p>All Wardens to become familiar with the FERP</p>
Appendix AA - Shelter in Place (Flood Emergency Response) Strategy	Watertech	<ul style="list-style-type: none"> • Evacuation is not appropriate for this site as the site can become isolated with little warning and insufficient time to evacuate • Flood wardens to be subscribed to BOM weather app • At least 2 flood wardens on site at all times • Flood wardens must be able to open the wellness centre for site occupants • Flood warden to have access at all times to device with 4-5g internet access and 24hr capacity • Signage and audible PA system throughout site • Backup generator located above PMF level to wellness centre and RAC with 8hr power supply. • Recommended for dwellings as well to assist approval of SSSA • All buildings to be used for Shelter in Place to be certified by a structural engineer to withstand floodwater forces of PMF • Non-perishable food and drink stored in wellness centre and RAC, encourage residents to do the same • First Aid kit in each building.
Appendix KK - Water Management Plan	ACOR	<ul style="list-style-type: none"> • Report covers the main initiatives, including providing efficient fittings and fixtures to reduce potable water demand, provide rainwater tank for rainwater harvesting and reuse, and introducing multiple WSUD measures to the system to improve the stormwater quality. • The mentioned water management strategies are expected to be further developed and detailed by suitable consultants at a later stage.



Biodiversity and Vegetation Management

Potential Impacts

- Potential habitat for Large-eared Pied Bat within subject land, a species polygon has been created to offset the impacts to the species.
- The majority of the property is made up of infrastructure associated with the seniors home, which includes apartment buildings, offices, driveways and carparks. The property also includes a large portion of highly modified landscaped areas such as mown grass, exotic planted trees and shrubs and landscaped garden beds. Some planted native species are located within the property. These include non-local species such as Alexandra Palm (*Archontophoenix alexandrae*) and Weeping Bottlebrush (*Callistemon viminalis*).
- Native plantings also include local native plants such as Cheese Tree (*Glochidion ferdinandi*), Sandpaper Fog (*Ficus coronata*), Lilly Pilly (*Syzygium australe*), Cabbage Palm (*Livistona australis*), *Cyathea australis* (Rough Tree Fern), Bangalow Palm (*Archontophoenix cunninghamiana*) and Illawarra Flame Tree (*Brachychiton acerifolius*). A number of other planted native species were located within the property.
- The property contains large areas of native vegetation particularly along the riparian corridor located along Collins Creek and along the unnamed stormwater line (Image 49). The vegetation along Collins Creek was highly disturbed due to the presence of exotic trees and shrubs, as such this was assigned a condition of 'Native-exotic matrix'. The canopy largely consists of Coral Trees (*Erythrina x sykesii*) and Jacaranda (*Jacaranda mimosifolia*) and a small number of native trees such as Bangalay (*Eucalyptus saligna x botryoides*). This area was assigned to PCT 3153 in a 'Native-exotic matrix'. No impacts are proposed within this area and therefore no further assessment of this vegetation has been undertaken.
- Given the proximity of the subject land to the Illawarra Escarpment (>2 km), some records of the species within the LGA (NSW DCCEEW 2025c) and the presence of some native vegetation the Large-eared Pied Bat (*Chalinolobus dwyeri*) has been assumed present within the subject land, with PCT 3153 in a 'Moderate' condition class.
- Based on the habitat constraints, absence of microhabitats and substantially degraded nature of the subject land, all other species have been excluded from further assessment (considered unlikely to use the subject land in accordance with Section 5.2.3 of the BAM). As such, targeted species searches were not required. Justification is provided in Section 4.3 of the BDAR).

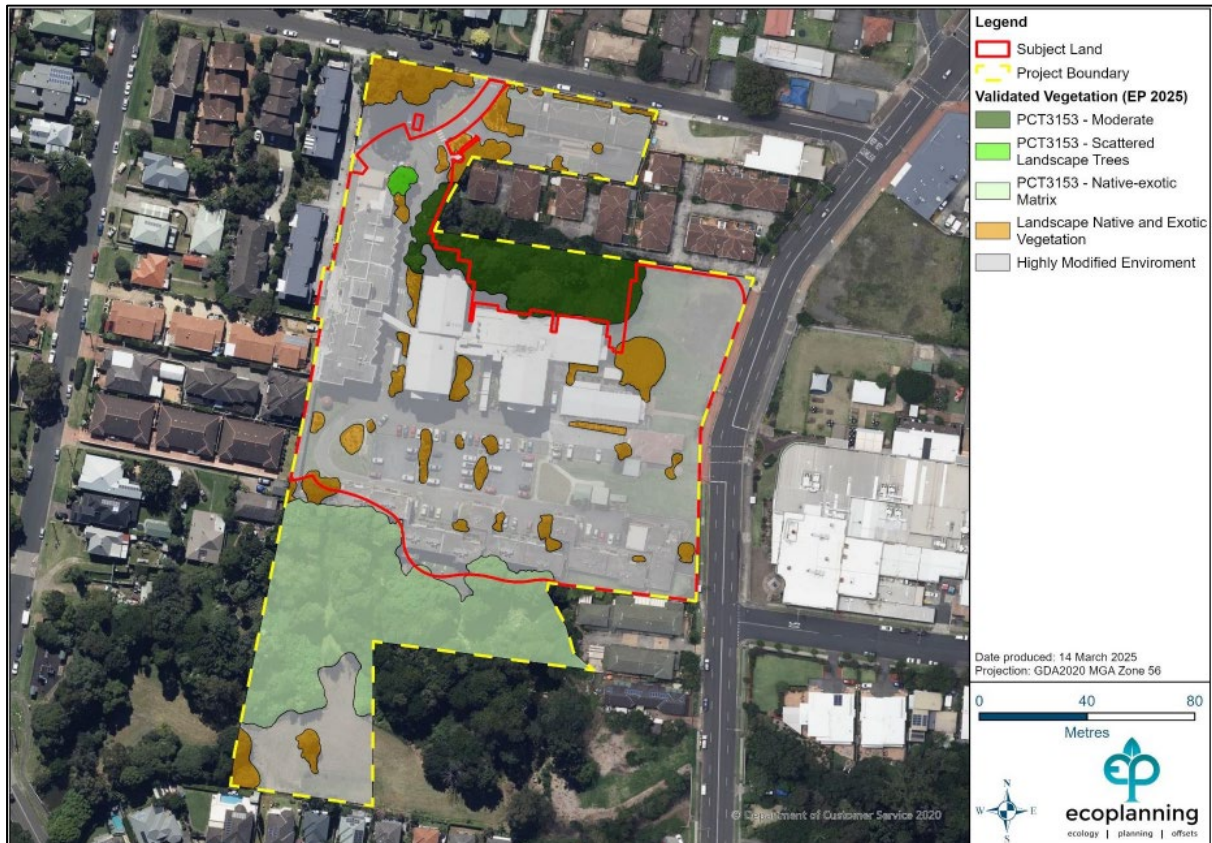


IMAGE 53 – FIELD VALIDATED MAPPING WITHIN THE SUBJECT LAND (ECOPLANNING)

The development requires the consideration of one hundred and eighteen (118 trees on and adjacent to site which prescribe to the definition of a tree and are protected by local council guidelines. An Arboricultural Impact Assessment Report has been prepared by Allied Trees. The aims and objectives of this report are to detail species identification, dimensions and condition, useful life-expectancies (ULE ratings²), tree retention values (IACA STARS ratings), tree protection zones (TPZ as per AS4970), impact upon all trees within the vicinity of proposal, design changes, construction techniques, etc. and tree protection methodologies & recommendations. The above-mentioned recommendations are acknowledged and acceptable from a tree removal and protection perspective, and it is anticipated these can be incorporated as conditions of any forthcoming consent accordingly.

A total of 35 existing trees will be retained and 83 trees removed as identified in the Arborist Report (Appendix E). An additional 71 trees will be planted as detailed in the planting schedule in the Landscape Concept Plan (Appendix U). The existing canopy coverage is 6,480m² approximately 22.2% of the site area and the proposed canopy coverage is 10,981m² approximately 37% - see Image 33 below and Appendix U.

Mitigation Measures

Considering the proposed vegetation removal, strong emphasis has been placed on achieving an optimal landscape vision for the proposed development in order to re-establish a natural localised character for future residents and the community. To

assist in this vision a Landscape Plan (Image 50) has been prepared by Arcadia, who understand the importance of creating a community landscape which promotes healthy living and well-being. A central focus of their landscape strategy has been to provide a strong indoor-outdoor connection to increase the exposure of residents to green spaces and create communal spaces that are flexible to support a variety of uses.

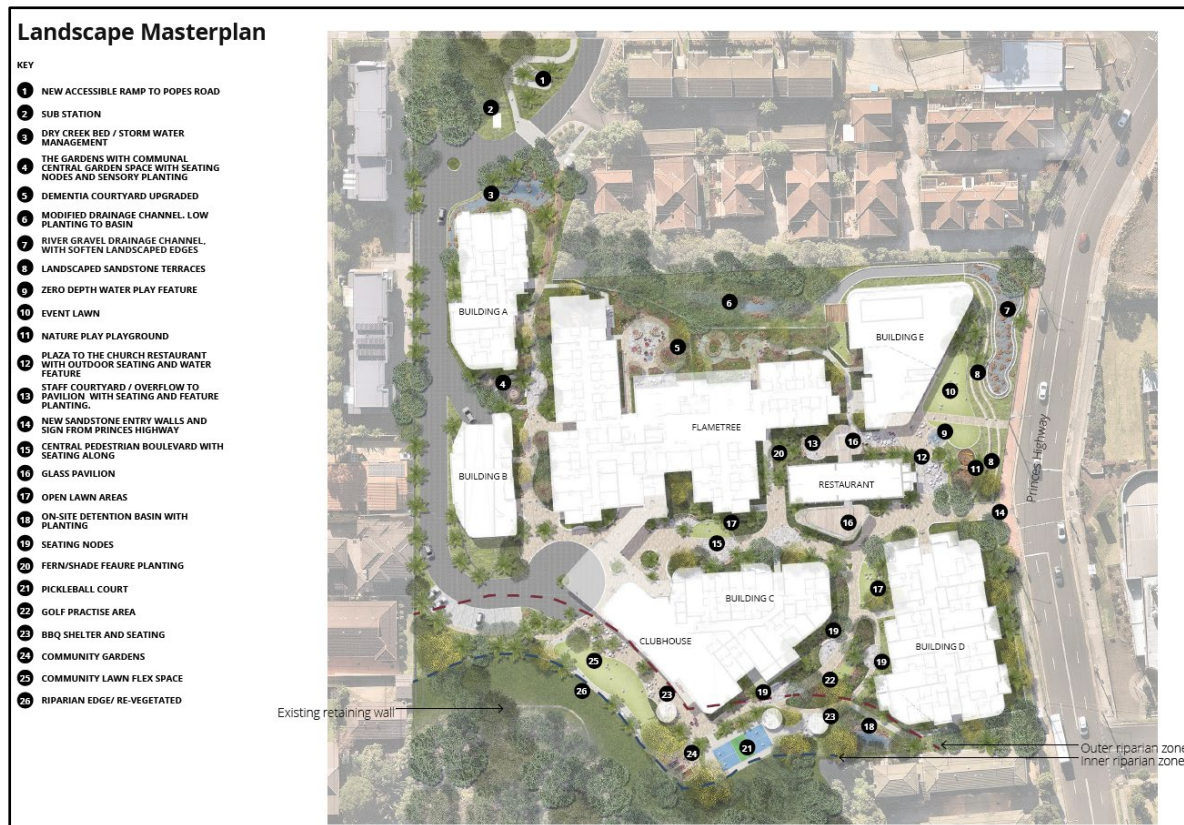


IMAGE 54 – EXCERPT OF LANDSCAPE MASTERPLAN (ARCADIA)

In response to the potential biodiversity impacts, under the BDAR, Biodiversity Offsets are required. The Credit Payment Report generated from the BAM Calculator is included in the BDAR report. A total of one ecosystem credit and one species credit is required to offset the proposed impacts.

A Vegetation Management Plans (VMP) will also be required to provide for future vegetation management.

As detailed in the Arboricultural Impact Assessment, Identified Trees No. 1-13, 17, 21, 24-31, 48-63, 69, 71-94, 96, 98-102 and 104-109 will be adversely affected and a total of 83 trees will be removed. Trees to remain with potential for minor impacts have recommended mitigation measures.



Visual Impact

Potential Impacts

As detailed in the Urban Design Analysis and suggested by Council and SDRP, the view from the Princes Highway north of the site looking towards the former church heritage item with the escarpment visible above the former church and the riparian zone vegetation behind should be retained.

A Visual Impact Assessment was undertaken by Urbaine Design provides an objective approach to the likely visual impact on the surrounding areas from the seniors housing proposal at the site. The Visual Impact Assessment reviewed the proposal, within its future setting and concludes that, although there are locations within the neighbouring properties that are impacted by the new development, the relevant views, as selected within the report, are public viewpoints, within a contained 3km radius of the site.

The assessment of view loss experienced by observers varies from Nil to Moderate-to-Severe. This is largely due to the topographical undulations of the area, relative to the high-value views - to the ocean in the east and the Illawarra Escarpment in the west. The visual impact is, inevitably, greater, at close proximity, without the landscape screening of the buildings, particularly at their upper levels. However, when seen within the context of the variety and scale of existing buildings within the town centre, the overall visual impact can be deemed acceptable.

Mitigation Measures

- The proposed development north of the former church set back from the street frontage to preserve this view, with an angled setback from the Princes Highway.
- Consider maintaining existing views to vegetation behind the former church frontage by retaining an open space or lower rise buildings beyond the church along this view.
- Remove the fig tree north of the former church to open up the view (replace this tree with new tree plantings in more appropriate locations)
- The proposal is largely compliant with Visual Impact requirements and satisfies the Council's guidelines for view sharing between neighbouring properties and from public viewpoints.
- Based on Urbaine Design's 3D analysis, photography, and site visit, Urbaine Design have recommended that the State Significant Development Application be approved on the grounds of an acceptable amount of visual impact and view loss, when assessed against the permissible building envelope for the site.



Transport and Accessibility

Potential Impacts

The potential impacts of the proposed development on transport and accessibility have been considered by Stantec in the Transport and Accessibility Impact Statement and the Urban Design Analysis by Urbanac.

- **Access**

The site has two street frontages – Popes Road to the north and the Princes Highway to the east. The major pedestrian access through the site is from the Princes Highway, running east west through the site south of the heritage building.

The existing vehicle access is from Popes Road, via an internal private road within the site connecting to the range of existing buildings. Given the accessibility of the site to the Princes Highway and the Woonona Town Centre, open thoroughfare through the site and an inviting entry provides a positive impact to the site context which is currently fenced with restricted access from the Princes Highway frontage.

Temporary construction vehicle access is proposed on the Princes Highway which is currently in place and approved for the Council approved demolition works.

Mitigation Measures

- Proposed development will generate net additional 28 trips in AM peak period and 42 trips in PM peak period. The max increase in queue on Popes Rd/ Princes Hwy will be 3m with 3 second delay, which is considered negligible with no adverse impact to road network
- Works will be carried out during the approved workhours
- Construction vehicle access will be provided via a temporary access proposed on Princes Highway, left-in-left-out access that can accommodate up to a 12.5 meter HRV vehicle.

Noise and Vibration

Potential Impacts

A Noise Impact Assessment was prepared by Acoustic Logic to consider the potential noise impacts associated with the following:

- Traffic noise impacts from nearby busy roads.
- Mechanical plant (in principle) and loading dock noise emissions.
- Demolition construction noise and vibration impacts.

It is expected that the most impactful typical construction activities for the development will be from demolition works, occurring on the south and west border. The sites demolition and construction vibration management plans should be consulted for these works.



Mitigation Measures

The Noise Impact Assessment includes recommended mitigation measures for construction including:

- Minimum glazing for windows and doors with acoustic seals
- Thicker entry doors
- External roof and ceiling construction
- External wall construction
- Natural ventilation requirements

The assessment includes recommendations for mitigation measures for ongoing noise emissions including:

- Mechanical plant noise emissions
- Loading dock
- Construction noise and vibration

Acoustic Logic prepared a Demolition Noise and Vibration Management Plan for the proposed development for demolition and construction noise generation including:

- Hours of work
- Quiet work methods
- Monitoring
- Perimeter fencing
- Community consultation
- Powered hand tools
- Vehicle noise
- Materials handling/vehicles
- Complaints handling
- Site induction
- Contingency plans.

Social Impact

Potential Impacts

An assessment of the likely social impacts of the project has been undertaken in the Social Impact Assessment, prepared in accordance with the Social Impact Assessment Guidelines 2021. The purpose of the SIA is to analyse the potential social impacts that may arise from the development, during the construction and operational phases.

After a review of the proposal and a desk top review of the area immediately surrounding the site, a scoping study was undertaken by GYDE Consulting to identify the potential impacts likely to occur because of the proposal.

The preparation of the scoping study involved:

- site / neighbourhood visit
- review of planning documents



- review of state and City of Wollongong policy and planning drivers
- demographic and population reporting

The initial impacts identified through the scoping study included:

- Impacts related to the provision of ILUs, particularly as part of residential aged care, and the general need for additional housing in Wollongong
- Impacts related to the proximity of goods and services, transport and social infrastructure proximal to the site
- Impacts related to the displacement of any residents
- Impacts related to traffic and parking - provide appropriate cycle spaces; prepare a Construction Traffic Management Plan
- Impacts related to construction noise and vibration particular in an aged care context
- Impacts related to local amenity through the construction and operational phases

The following key impacts and their assessment are summarised from the SIA as follows:

- Impacts to relocated residents - assessed as low
- Impacts to provision of seniors housing - assessed as very high positive
- Impacts related to location - assessed as very high positive
- Impacts to traffic and parking - assessed as low
- Impacts to community structure and social connections - assessed as high positive
- Impacts related to construction activity - assessed as low negative
- Impacts to local amenity - assessed as low

Mitigation Measures

This Social Impact Assessment concludes that the Proposal is suitable and warrants approval subject to the implementation of the following mitigation measures:

- Maintain ongoing communication with relocate-affected residents (through newsletters etc.) and keep them up to date with general information about centre events and activities
- Continue to engage with the Green Travel Plan
- Monitor the Green Travel Plan / prepare a travel questionnaire for all residents and staff to provide a baseline for travel planning programs
- Subsequent survey results should be reported
- Introduce activities that provide opportunities for new residents to meet others including those in residential aged care where appropriate.
- Consider employing a local First Nations artist to implement public art or Connecting with Country initiatives
- Ensure the public art continues to engage with Coomaditchie United Aboriginal Corporation and Aboriginal Elders
- Implement the recommendations and the mitigations measures listed in the Demolition Noise and Vibration Management Plan
- Implement the recommendations and mitigation measures listed in the Construction Vehicle Management Plan to Construction Certificate stage



- Develop a process to ensure community consultation is conducted prior to and throughout the demolition and construction stages, and specifically for high impact noise and vibration and traffic activities
- Continue to engage with surrounding residents, staff and others connected to the site during the construction stages to inform of any significant changes to the architectural or landscape design.

Adaptive Reuse of Heritage Church

Potential Impacts

The proposal includes the adaptive reuse of the Heritage Item – former Church located on site as a café and kiosk as an ancillary use to the overall seniors housing development. The heritage item is a redundant church building no longer used for the purpose it was built. The church is currently used by IRT as part of the overall seniors housing development being approved for a change of use to a dementia day care centre in 2008.

The Heritage Impact Assessment prepared by Weir Phillips Heritage notes that the proposed works will have an acceptable impact on the 'Former Woonona Uniting Church' for the following reasons:

- The proposed buildings are consistent with the setting of the item which already includes contemporary buildings.
- The proposed buildings have been sensitively sited to reduce their impact on significant view corridors.
- Buildings A, B and C will be located to the rear to the heritage item and will not impact on views towards the heritage item.
- Building E will have a similar front setback to the heritage item. The impact of this has been skilfully mitigated in the form of the building which tapers in width to preserve existing views from the north.
- Building D will forward of the heritage item and will reduce views on approach from the south on Princes Highway. These views have historically been limited due to the existing 'Former Shop and Dwelling' and are of less significance than those from the east and north.

Mitigation Measures

The use of the heritage church as a café/kiosk provides an adaptive reuse of the church that will facilitate heritage conservation initiatives that provides a positive impact on the heritage item and allows residents and visitors to interact with this heritage item.

The proposed adaptive re-use will help to conserve the heritage significance of the 'Former Woonona Uniting Church' by giving it a viable use that will raise the necessary funds for its long-term maintenance. The proposed restaurant use requires minor alterations that are confined to areas that have already undergone change or are not readily visible. The fit-out will be minimally fixed into stud walls and will be easily reversible. Significant fabric including tiled floors and timber lined ceilings will be



retained. The new kiosk and pavilion will present as visually subordinate in scale and materiality to the retained heritage item.

The Heritage Impact Assessment provides the following summary of mitigation measures in respect of the proposed development in the context of the heritage values on site:

- The proposed buildings are well-designed and will have highly articulated elevations of a coordinated and contemporary aesthetic that will sit comfortably in the setting of the item.
- The proposed buildings will be constructed of high-quality materials including sandstone cladding, brick and timber. The varying materials will help to break up the massing of the buildings.
- The visual impact of the four-storey height to the buildings has been successfully reduced by the introduction of deep setbacks, which allows a sufficient curtilage for the heritage item to continue to be appreciated in the round.
- The proposed alterations and additions to the existing 'Flametree RCF' are minor, located to the rear of the heritage item, and will not result in a substantial increase to the massing and scale of the existing 'Flametree RCF'.
- The basement car parking will replace intrusive surface car parking. It will be set well back from the boundaries of the item, which is sufficient to ensure there is physical or visual impact on the item.
- The proposed works will, overall, have an acceptable impact on the ability of the public to understand and appreciate the heritage significance of the 'Former Woonona Uniting Church' as a Federation period redundant church building.

Environmental Impacts and Mitigation Measures

This EIS is supported by Architectural Plans prepared by Calderflower and technical supporting documents. Other potential impacts and mitigation measures of the proposal are summarised in Appendix MM and the table below. Please refer to the supporting documents for detailed environmental assessment.

Document	Author	Potential Impacts and Mitigation Measures
Appendix X - Preliminary Hazard Analysis/ Resilience and Hazards Assessment	Riskcon	<ul style="list-style-type: none"> • Dangerous Goods stored onsite and transported do not exceed the threshold quantities outline in SEPP 33 • Any dangerous good to be stored in accordance with relevant Australian Standards and Safety Data Sheet • Assessment of high pressure gas pipeline located outside of the site, there is negligible risk associated with proximity to gas line
Appendix EE - Surface and	Soilsrock	<ul style="list-style-type: none"> • Engineer recommends secant piled wall for basement construction to manage ground



Groundwater Impact Assessment		water Recommends using a WSUD Report (provided by ACOR).
Appendix N - Ecologically Sustainable Development Report	Credwell	<ul style="list-style-type: none"> ESD initiatives include; Biodiversity, Riparian Management, Arboricultural Management, Hazardous Materials, Climate Change Adaption, Aboriginal Heritage, BASIX Commitments etc.
Appendix S - Geotechnical Report/ Hydrogeological Report	Soilsrock	<p>Geotech:</p> <ul style="list-style-type: none"> Recommended during the excavation, techniques be adopted without causing more than 5mm/sec vibrations limit (Peak Particle Velocity) to the existing and neighbouring residential buildings Vibration monitoring plan must be carefully planned by the builder. Dilapidation surveys for adjoining West, North and South buildings, and road at Princess Highway It is expected to experience medium to high flows of groundwater seepage during excavation. Temporary and/or permanent shoring support is required along all sides of the basement excavation due to non self-supporting soil condition A significant Coal layer of 4.05m thickness was encountered within the Borehole BH12 Hydro Report Hydro report provides stormwater engineers with information on groundwater volume for assessing, recommending and designing appropriate basement drainage Secant piling wall for basement is recommended and assumed for estimate groundwater inflow Groundwater inflow is relatively high and may require a Water Access License by Water NSW if a drained basement solution is adopted
Appendix T - Hazardous Material Survey	Reditus	<ul style="list-style-type: none"> Hazmat identified and to be removed by suitably licensed contractor prior to demolition include; Lead paint, asbestos containing material, PCB containing material , synthetic mineral fibre
Appendix W - Pedestrian Wind Environment Assessment	SLR	<ul style="list-style-type: none"> Incorporate setbacks and awnings at entry points Include horizontal wind breaks (shade cloth) over seated areas Incorporate landscaping/ trees throughout landscape, maintain tall trees along North and



		West sides of seated areas to serve as vertical windbreaks
Appendix J - CPTED	MMJ	<ul style="list-style-type: none"> • Install CCTV to perimeter, pedestrian and vehicle entrances • Lighting at entry/ exit points, points of unlawful access, sufficient night lighting • Temp onsite rooms for construction to be locked and alarmed at night, area to be well lit • Designated personnel only to have key/swipe/ code access • Effective signage during construction stages • Effective signage during operation, identify commercial spaces and hours of operation • Remove graffiti asap
Appendix O - Engagement Report	Brookes	<ul style="list-style-type: none"> • Key Feedback includes; development details, new facilities, heritage character of church, flooding, construction impacts, resident safety, traffic, job security, fig tree removal, care needs, accessibility through site, contamination, mobile reception, community support during construction, higher density living, car parking
Appendix Y - Preliminary Site Investigation	Douglas Partners	<ul style="list-style-type: none"> • Low likelihood for gross widespread contamination, moderate potential for localised contamination. Recommended further groundwater testing is conducted. • Recommended that an intrusive soil investigation of the site is conducted to target areas of fill. • Any soils requiring off-site disposal during the development are to be appropriately classified prior to removal from site.
Appendix M - Detailed Site Investigation	Soilsrock	<ul style="list-style-type: none"> • Potential contaminants from historical land use are deemed low to medium. • Site can be made suitable for proposed residential development subject to; Construction Management Plan, Waste classification and validation, Hazardous building materials assessment, Unexpected Finds Protocol, further topsoil sampling within footprint of demolished buildings, dewatering works may be required therefore carryout groundwater contamination screen testing prior to excavation, assessment of any imported material.



<p>Appendix C - Aboriginal Cultural Heritage Assessment Report</p>	<p>Austral</p>	<ul style="list-style-type: none"> No further assessment or works are required to be undertaken within the current footprint for the proposed works in regard to Aboriginal cultural material. IRT continues to inform the Aboriginal stakeholders about the management of Aboriginal cultural heritage within the study area throughout the completion of the project
<p>Appendix D - Access Report / Statement</p>	<p>ABS</p>	<ul style="list-style-type: none"> Proposal can achieve compliance with the access provisions of the BCA, the Access to Premises Standard and Housing SEPP
<p>Appendix Z - Services Availability Review</p>	<p>JN</p>	<ul style="list-style-type: none"> The existing substation and main switchboard have capacity to supply the entire new proposed masterplan works The existing communication racks and equipment in Flametree are relatively new, in good condition, well maintained and could be retained Recommend replacement of Nurse call system and security system in Flametree Recommend replacement of FIP in Flametree Maintain existing incoming domestic cold water services to serve the new developments domestic cold water requirements. Coldwater provision at Southern end of site near Blueberry Ash building will become redundant It is expected that the works will include possible sewer main diversions, encasements and building over or adjacent to existing sewer main design, applications and approvals The existing sewer main is expected to have suitable capacity to serve the proposed development pending Sydney Water Notice of Requirements Letter Sewer main connections to the existing Blueberry Ash and Rectory buildings will become redundant The fire hydrant and fire sprinkler boosters are quad inlet and outlet types with a 150mm inlet and outlet. This service extends down the main entry road in a north south direction with branches off the services to each of the buildings. Capped provisional services have been included for the future development of the site and would be utilised for the new development.



		<ul style="list-style-type: none">It is expected that the existing fire services boosters and primary inground piping infrastructure will be suitable to serve the future development.
Appendix KK - Water Sensitive Urban Design Report	ACOR	<ul style="list-style-type: none">The overall catchment has been designed on a basis of 'no actionable nuisance', on-site detention has been proposed to ensure peak median post development discharge flows will not be exceeded with the new development. A treatment train consisting of proprietary devices to meet State Planning Policy stormwater quality requirements has been designed.
Appendix JJ - Waste Management Operational Plan	Elephant's Foot	<ul style="list-style-type: none">Wasterooms to comply with min standards as outlined in Wollongong DCP

Project Justification

The proposed development involves the delivery of a new seniors housing development, including independent living units and alterations to an existing residential care facility. There is need for such a facility due to the region's ageing population and the existing gap in suitable, accessible housing options. It has strong alignment with strategic planning policies, including the NSW Housing SEPP and relevant regional/local plans, by showcasing the chosen Woonona site's suitability due to its proximity to essential services like shops, medical practitioners, and transport. The project will provide significant socio-economic benefits, including local investment, job creation, increased housing diversity, and improved quality of life for seniors.

In considering the justification of the proposed development and in reference to Section 4.15 of the EP&A Act which specifies matters for consideration a consent authority must consider in determining a development application, the following matters have considered:

- Design of the proposed development, including actions taken to avoid or minimise the impact of the proposed development while still achieving the objectives of the project.
- Consistency with the strategic context.
- Consistency with the statutory requirements.



- The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality.
- The suitability of the site for the development; and
- The public interest.

Design of the Proposed Development

The alternatives considered and actions taken to avoid or minimise the impacts of the project have been set out in the preceding sections of this EIS. Subject to the implementation of these mitigation measures, it is considered that any potential impacts of the proposal will be minimal and acceptable.

Consistency with the Strategic Context

The strategic context for the proposal has been discussed in the preceding sections of this EIS, and the proposal is considered to be consistent with the relevant strategic context.

Consistency with the Statutory Requirements

The relevant statutory requirements have been discussed in the preceding sections of this EIS. Specifically, this EIS has addressed all the matters specified in the issued SEARs.

Consistency with the Objects of the Act

This EIS has examined and considered all possible matters affecting or that are likely to affect the environment by reason of the proposed development. The Proposal is consistent with the relevant Objects of the Act as listed under Section 1.3 of the EP&A Act and will not result in any unjust or significant environmental impact.

Principles of Ecologically Sustainable Development

Section 193 of the EP&A Regulation outlines four (4) principles of ecologically sustainable development to be considered in assessing a project. They are:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity and ecological integrity; and
- Improved valuation, pricing and incentive mechanisms.
 - An analysis of these principles is provided in the following sections.

Precautionary Principle

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



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

Intergenerational Equity

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

- Ensuring the health, diversity and productivity of the environment are maintained through the implementation of passive and active design measures that reduce operational energy and water use from the project.
- Reducing energy, water and waste to ensure that the health, diversity and productivity of the environment is maintained for the benefit of future generations.
- Implementing safeguards and management measures to protect environmental values.
- Facilitating job creation in close proximity to homes and public transport.

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

Conservation of biological diversity and ecological integrity

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

Improved valuation, pricing and incentive mechanisms

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

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



Likely Impacts of Development

Having regard to the natural environment, built environment and economic and social impacts of the proposed development, the likely impacts of development are considered acceptable as outlined in the following sections.

Built and Natural Environment

The EIS for the proposed development has demonstrated that the proposal adopts appropriate management strategies and will generate limited environmental impacts, due to the existing context of the site.

The key potential environmental impacts of the proposal are summarised below:

- **Built form and urban design** – The proposed ILU and RCF buildings adopt a modulated form through articulation of balconies and generous setbacks that respond to adjoining development. This transition along with a high quality landscaping scheme ensures that any adverse impacts of the proposed development are minimised.
- **Visual impact** – Selected viewpoints in the public domain were assessed for the visual impact that the proposal would have on them in the Visual Impact Assessment. The VIA concluded that the proposal would have no visual impacts of major or high significance, and would have moderate visual impacts on 4 viewpoints, low visual impact on 3 viewpoints and negligible visual impact on 1 viewpoint. The VIA recommends that conditions of consent are imposed in relation to the retention of boundary trees and vegetation, fencing, signage materiality and colours, to manage visual impacts.
- **Traffic, Parking and Access** – A Transport Impact Assessment has been prepared for the proposed development which has assessed the traffic generation. Furthermore, the proposed on-site car parking provision complies for all requirements, and is therefore acceptable.
- **Biodiversity** – A Biodiversity Development Assessment Report has been prepared for the proposed development, which has assessed the proposal in consideration of serious and irreversible impacts on threatened vegetation community on the Cumberland Plain Woodland in the Sydney Basin Bioregion Critically Endangered Ecological Community (CEEC). Residual impacts to native vegetation will require eight ecosystem credits and eight species credits in accordance with the Biodiversity Offsets Scheme.
- **Tree removal and Retention** – An Arboricultural Impact Assessment has been prepared for the proposal which considered 118 trees located on and adjacent to the lot and the viability of those trees based on the proposed works. Trees No. 14-16, 17.1, 18-20, 22, 23, 32-47, 47.1, 64-68, 70, 95, 97, 103, 110 and 111 are not adversely impacted by the design are proposed to be retained with tree protection measures. A total of 73 trees are proposed to be removed including



trees No. 1-13, 17, 21, 24-31, 48-63, 69, 71-94, 96, 98-102 and 104-109 are adversely impacted by the design and are unable to be retained. It was noted that to compensate for the loss of these trees, consideration should be given to replace these trees within the site.

- **Noise and Vibration** – A Noise and Vibration Impact Assessment has been prepared which assesses the impacts of the construction and operational phases of the proposal. The report concludes that the noise emissions from the project can comply with the requirements of the relevant legislation and guidance.
- **Construction Activity** – The Social Impact Assessment has assessed the potential impact to residents and neighbours relating to construction activity. Those living close to sites with high levels of activity can suffer from the annoyance of noise that can cause disturbance of sleep, cognitive impairment, decreased mental wellbeing and other health and wellbeing impacts. Children, those with complex cognitive issues, the elderly and those with underlying mental health conditions are particularly vulnerable to the impacts of noise. The SIA summarises the following:
 - Residents will remain on site during the construction period. There are also several residential properties directly surrounding the site.
 - Those in residential care are likely to be vulnerable and potentially the most impacted by construction activity, especially noise and vibration. Residents in the neighbouring properties may also be impacted by construction activities.
 - A Demolition Noise and Vibration Management Plan (DNVMP) has been prepared for the construction stage which introduces mitigation measures to limit the impacts.
 - This Assessment lists the DNVMP mitigation measures given their importance in the context of construction taking place near to the Residential Care Facility.
 - To limit the impact of construction traffic a Construction Traffic Management Plan (CTMP) has been prepared as part of the Traffic Impact Assessment.
 - This Assessment lists the CTMP mitigation measures given their importance in the context of construction taking place near to the Residential Care Facility.
 - Provided DNVMP and CTMP recommendations are followed, management controls and procedures outlined are implemented in addition to those outlined in Section 11. of this Assessment, these impacts can be minimised. the residual impacts related to construction activity are assessed as Low Negative.

Recommendations for noise mitigation measures are made.



- Construction impacts – A Preliminary Construction Management Plan has been prepared to manage effects during the construction phase of the development.

Social and Economic

An assessment of the likely social impacts of the project has been undertaken in the Social Impact Assessment, prepared in accordance with the Social Impact Assessment Guidelines 2021. The purpose of the SIA is to analyse the potential social impacts that may arise from the development, during the construction and operational phases.

The SIA notes the following most positive social benefits of the proposal:

- Impacts related to resident displacement - Low
- Impacts related to the provision of seniors housing – Very High Positive
- Impacts related to location – Very High Positive
- Impacts related to traffic and parking – Low
- Impacts related to community structure and social connections – High Positive
- Impacts related to Connecting with Country – High Positive
- Impacts related to construction activity - Low Negative.
- Impacts related to local amenity – Low

Overall, the redevelopment of the site for the proposed seniors housing development will ensure positive social outcomes and economic benefits for the broader community.

Suitability of the Site

Having regard to the characteristics of the site and its immediate surrounding context, the proposed development is suitable for the site for the following reasons:

- The site can appropriately accommodate the proposed development while balancing environmental and design consideration and preserving the amenity of neighbouring properties;
- It will cater for the ageing population and provide capacity for existing residents in the local community to age in place and provide an increased supply and diversity of housing that meets the needs of seniors in Woonona;
- It will provide a built form that has been architecturally design commensurate with the surrounding environment.
- The architectural design will deliver a high quality and modern seniors housing development, which will support a safe and secured seniors living environment;
- Residents will have adequate access to services and facilities by public transport, with bus stops.
- The site will provide important infrastructure to service the local and regional area.



Public Interest

It is considered that the proposed development is in the public interest for the following reasons:

- It will contribute to meeting the strategic need for additional housing diversity including the provision of seniors housing in an accessible location;
- It will provide a contemporary, high amenity village, with support services and facilities to provide ILUs and RCFs that meets modern day standards, which provides opportunities for residents to age in place and accommodate a continuum of care;
- Provide significant investment in the seniors housing sector within the Wollongong LGA that will provide both construction and operational employment opportunities.



Conclusion

This Environmental Impact Statement has been prepared by MMJ Town Planning on behalf of our clients to accompany a SSDA for a proposed redevelopment of existing Seniors Housing development including the construction of five (5) apartment buildings containing independent living units, adaptive reuse of existing church, alterations/additions to existing Residential Care Facility, wellness hub, landscaping and car parking on Lot 2 at Lot 71 DP 1160947, 4-6 Popes Road, Woonona (subject site).

At present, the subject site contains multiple buildings and internal roadways associated with seniors housing development “IRT Woonona” including: Flametree Residential Care Facility (RCF), Ribbonwood RCF, Blue Gum Sanctuary (Heritage Listed Church), Rectory, Camelia Lodge Units, and Blueberry Ash Apartments.

The proposal is detailed further in the Architectural Drawings prepared by Calderflower. The proposal is generally compliant with relevant legislative requirements and Environmental Planning Instruments and a variation has been sought for a building height breach.

The proposed land use is permissible, and the proposal is consistent with the objectives for the Zone and is compliant with the relevant LEP clauses, SEPP's and DCP requirements, with non-compliances adequately addressed. Appropriate justification has been provided for this variation, and this is capable of being supported on planning grounds.

The proposed building is of a contemporary building design employing high-quality materials, attractive landscape features, and appropriate setbacks which complement the streetscape.

The proposal includes appropriate stormwater and traffic management, designed to complement the surrounding environment, and minimises potential impacts on neighbouring properties.

This EIS has addressed the potential impacts arising from the proposal on surrounding properties, including environmental and social and economic impacts. Where necessary, mitigation measures are proposed to minimise these potential impacts and reduce the potential risk associated with the development.

Given the merit of the design and the absence of any significant adverse environmental impacts or planning issues, the DA is considered to be in the public's interest and worthy of Council's support.